



AGORA S.A. AND THE AGORA GROUP

Non-financial report
Agora S.A. Group
for **the year 2023**

March 19, 2024

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AGORA GROUP NON-FINANCIAL STATEMENT FOR THE YEAR 2023

I. GENERAL INFORMATION

ESRS 2 GENERAL DISCLOSURE

BP-1 GENERAL BASIS FOR PREPERATION OF SUSTAINABILITY STATEMENTS

This non-financial report of the Agora S.A. Group (also referred to as the *ESG Report for 2023. Agora Group and Agora S.A.*) includes information and consolidated non-financial data of the Agora Group and its parent company Agora S.A. for the period from January 1 to December 31, 2023. The scope of consolidation of this report is the same as the scope of consolidation of the Agora Group's financial statements for the 2023 balance sheet period.

The information and data in this report marked "Agora Group" refer to the following companies: AMS Serwis sp. z o.o., Agora Finanse sp. z o.o., Agora S.A., Agora TC sp. z o.o., AMS S.A., Doradztwo Mediowe Sp. z o.o., Goldenline Sp. z o.o., Grupa Radiowa Agory Sp. z o.o., Helios S.A., Helios Media Sp. z o.o., HRlink Sp. z o.o., IM 40 Sp. z o.o., Inforadio Sp. z o.o., Next Film Sp. z o.o., Optimizers Sp. z o.o., Video OOH sp. z o.o., Plan A Sp. z o.o., Plan D Sp. z o.o., Step Inside Sp. z o.o., Yieldbird Sp. z o.o., Plan G Sp. z o.o., Eurozet Sp. z o.o., Eurozet Radio Sp. z o.o., Eurozet Consulting Sp. z o.o., Radio Plus Polska Centrum Sp. z o.o., Radio Plus Polska Sp. z o.o., Radio Plus Polska-Zachód Sp. z o.o., Spółka Producentcka Plus Polska Sp. z o.o.

The companies Eurozet sp. z o.o., Eurozet Radio sp. z o.o., Eurozet Consulting sp. z o.o., Radio Plus Polska Centrum sp. z o.o., Radio Plus Polska sp. z o.o., Radio Plus Polska-Zachód sp. z o.o., Spółka Producentcka Plus Polska sp. z o.o. became part of the Agora capital group on February 27, 2023 were not part of the capital group for the entire financial year.

Companies established in 2023: Agora Książka i Muzyka Sp. z o.o., Czerska 8/10 Sp. z o.o., Gazeta.pl Sp. z o.o., Wyborcza Sp. z o.o., have not been separated in this report, as they were not operating until the end of last year.

The publication implements the requirements of the amended Accounting Act of 15 December 2016¹ regarding the disclosure of non-financial information resulting from the transposition of *Directive*

¹ Act of 15 December 2016 amending the Accounting Act

95/2014/EU² and the Ministry of Finance Regulation of 25 May 2016 regarding information on diversity³ and complies with the requirement of the EU CSRD⁴.

In addition to the obligatory legal standards, the content of this report takes into account principles and recommendations relating to compliance with due diligence and other documents involving respect for Agora's underlying values.

The numerical and qualitative data presented in the report are derived from internal management information systems covering the Agora Group, including Agora S.A., which comprise the reporting and data validation process with external experts.

None of the subsidiaries included in the consolidation have been exempted from individual or consolidated sustainability reporting pursuant to Article 19a(9) or Article 29a(8) of *Directive 2013/34/EU* and the disclosure of information on expected events or matters under negotiation pursuant to Article 19a(3) and Article 29a(3) of *Directive 2013/34/EU* does not apply to them.

BP-2 DISCLOSURE IN RESPECT OF SPECIAL CIRCUMSTANCES

The data contained in this report has been collected and described for the first time, on an optional basis, based on the EU ESRS reporting indicators⁵ (*European Sustainability Reporting Standards*). As such, most of the numerical and non-numerical indicators presented here are not comparable to data reported under the *GRI Standards* methodology and standards (including for 2021 and 2022, under *GRI Standards 2021*). No adjustments have been made to data for previous reporting periods in this report.

It should be noted that the results presented here were significantly affected by the consolidation of Agora with the Eurozet Group from February 27, 2023. Due to the previous quarterly mode of agglomeration of non-financial data of Agora Group companies, data on environmental and employee activities of Eurozet Group were included, starting from the beginning of last year. On the other hand, the taxonomic data presented in the **EU Taxonomy** section correspond to the dates specified in the financial statements of which this report is a part.

Given the administrative issues, the environmental data reported within Agora S.A. also include the companies: Agora Finanse Sp. z o.o., Agora S.A., Agora TC Sp. z o.o., AMS S.A., Doradztwo Mediowe Sp. z o.o., Helios Media Sp. z o.o., IM 40 Sp. z o.o., Inforadio Sp. z o.o., Next Film Sp. z o.o., Yeldbird Sp. z o.o., Optimizers Sp. z o.o., Video OOH Sp. z o.o., Plan A Sp. z o.o., Plan D Sp. z o.o., Plan G Sp. z o.o.. For administrative reasons, also environmental data of Eurozet Group companies: Eurozet Sp. z o.o., Eurozet Radio Sp. z o.o., Eurozet Consulting Sp. z o.o., Radio Plus Polska Centrum Sp. z o.o., Radio Plus Polska Sp. z o.o., Radio Plus Polska Zachód Sp. z o.o., Spółka Producentcka Plus Polska Sp. z o.o. - were consolidated.

Given that there is no employment at IM 40 Sp. z o.o., Plan A Sp. z o.o., Plan D Sp. z o.o., Plan G Sp. z o.o., they are not included in the reported employee data for the rest of the Group.

² *Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups*

³ *Ordinance of the Minister of Finance of 25 May 2016 amending the Ordinance on current and periodic information provided by issuers of securities and the conditions for recognising as equivalent information required by the laws of a non-member state*

⁴ *Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU with regard to corporate sustainability reporting*

⁵ *Delegated Regulation 2023/2772 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards.*

For the 2021/2022 **climate risks and opportunities analysis** Agora Group identified the following time horizons - short-term (2022-2025), medium-term (2025-2040) and long-term (2040-2050). In contrast, the following time horizons - short term (2023-2027), medium term (2028-2035) and long term (2036-2050) - were adopted for the **scenario analysis** conducted in 2022.

Agora omits ESRS E2 Pollution, ESRS E3 Water Resources and ESRS E4 Biodiversity and Ecosystems - these areas were not identified as material during the materiality study and quantitative data analysis of the Group's key companies (reported to date in *GRI Standards* and *GRI Standards 2021*).

This Agora Group 2023 report does not include disclosures relating to the anticipated financial impact of risks. The exclusions for selected disclosures, described in Appendix C of ESRS 1, will be applied in full for the first time in the Agora Group's report responding to the requirements of the CSRD.

The materiality test has indicated that **ESRS S1, S2, S3** and **S4** are material and the disclosures contained therein are reportable. The details of the testing are described within the **ESRS 1, ESRS SBM-3** and **ESRS IRO-1** disclosures.

Among other things, this report publishes the *Scope 3* indicator, which refers to the determination of the carbon footprint of emissions generated in the Agora Group's value chain, including both upstream and downstream stages. The calculation process used the expenditure method, using indirect sources for the indicators used.

Given the specific nature and complexity of the Agora Group companies and the difficulty of obtaining data from suppliers and business partners, quantitative data may involve a risk of measurement uncertainty. However, it should be emphasised that the documentation of data sources, estimation methodologies and any caveats regarding uncertainty of results are presented with due care in order to ensure that the information contained in this report describes as accurately as possible the facts of the organisation's sustainability activities to date.

GOV-1 ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Agora S.A.'s corporate bodies are: **General Meeting of Shareholders, Supervisory Board** together with advisory bodies and the **Management Board**. The scope of competencies of the respective bodies and issues related to their activities are defined by law, in particular by the *Commercial Companies Code*, supervisory recommendations of the supervisory bodies and the ***Statutes of Agora S.A.*** available at www.agora.pl/en.

In 2022, acting pursuant to para. 2.1 (*Resolution No. 13/1834/2021 of the Supervisory Board of the Warsaw Stock Exchange S.A. of March 29, 2021*), the General Meeting adopted ***Agora S.A.'s Diversity Policy with regard to the members of the Management Board and the Supervisory Board***.

It should be noted that Agora has limited influence in shaping the composition of the body overseeing its activities, but nevertheless each time it indicates to the entities entitled to propose candidates to this body all the requirements and recommendations they should meet. Despite this, the current composition of both the Management Board and the Supervisory Board in 2023 reflected most of the criteria underlying the aforementioned policy. The exception was the issue of 30% female representation on the body.

1.1 Management Board

As at December 31, 2023 the Management Board of Agora S.A comprised five members:

- ▶ **Bartosz Hojka** - President of the Management Board
- ▶ **Anna Kryńska-Godlewska** - Member of the Management Board
- ▶ **Tomasz Jagiełło** - Member of the Management Board

- ▶ **Tomasz Grabowski** - Member of the Management Board
- ▶ **Wojciech Bartkowiak** - Member of the Management Board

There is no representative(s) of employees and other persons providing labour on the board of directors; there is no such practice on the Polish market.

1.2 Supervisory Board

The Supervisory Board of the Company operates in accordance with the provisions of *the Commercial Companies Code* and ***Statutes of Agora S.A.***

As at December 31, 2023, all members of Agora's Supervisory Board met the independence criterion under the Company's Articles of Association. Three of them also met the independence requirements set out in the *Good Practices of the WSE 2021*⁶, while, in accordance with the requirement set out in the *Act on Statutory Auditors, Audit Firms and Public Supervision of May 11, 2017* the company's Supervisory Board comprised two independent members. Depending on the criteria adopted, the percentage of independent members of the entire supervisory body can therefore be defined successively as: 100%, 50% and 33%.

As at December 31, 2023 the **Supervisory Board** comprised six members.

- ▶ **Andrzej Szlęzak** - Chairman of the Supervisory Board, member of the Personnel and Remuneration Committee
- ▶ **Wanda Rapaczynski** - Member of the Supervisory Board
- ▶ **Dariusz Formela** - Member of the Supervisory Board, Chairman of the Audit Committee
- ▶ **Tomasz Sielicki** - Member of the Supervisory Board, Member of the Audit Committee
- ▶ **Maciej Wisniewski** - Member of the Supervisory Board, Member of the Audit Committee, Chairman of the Personnel and Remuneration Committee
- ▶ **Tomasz Karusewicz** - Member of the Supervisory Board, Member of the Personnel and Remuneration Committee

Within the Supervisory Board there are: **Audit Committee** and **Human Resources and Remuneration Commission**, which have advisory functions. The powers and procedures of the Audit Committee and the Human Resources and Remuneration Commission are set out in the bylaws of these bodies adopted by resolutions of the Supervisory Board broadly described in the *Management Discussion and Analysis for the year 2023 to the consolidated financial statements*.

The curricula vitae of the individual members of the management and supervisory boards, describing their experience in relation to the company's sectors, products and geographical location, can be found on the Agora Group website: www.agora.pl/en/corporate-management.

The specific competences of the administrative, management and supervisory bodies include sustainability issues in addition to those provided for by law and the *Statutes of Agora S.A.* The supervisory authority continuously deepens its knowledge in both economic, social and environmental aspects on the basis of, i.a. factual material from the plenipotentiaries managing ESG issues at the operational level, as well as by participating in internal thematic training courses, conferences or by consulting external experts.

⁶ <https://www.gpw.pl/best-practice2021>

Setting strategic direction, overseeing risks and meeting targets:

The tasks of setting the strategic directions of the Agora Group's development and monitoring the status of the implementation of the set activities were assigned to the Group's management and supervisory bodies:

- ▶ **Management Board** - within the Agora Group, the Management Board is responsible for defining the strategic directions and creating the conditions and structures to ensure the effective functioning of the risk management process, verifies the completeness of the monitored risks, determines the acceptable level for each risk and accepts responses to risks to ensure the achievement of the Group's objectives.
- ▶ **Audit Committee of the Board** - oversees the effectiveness of the risk management system to ensure that key risks are properly identified, managed and disclosed.

The Agora Group's strategic objectives, including sustainability issues, are defined by the Management Board and consulted with the Supervisory Board. The Supervisory Board oversees and supports the implementation of the company's sustainability strategy by the Management Board and oversees and is involved in the validation of the Agora S.A. Group's annual non-financial reports.

GOV-2 INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The management, aware of the impact of Agora's activities on the environment, local communities, employees and the market environment, has integrated sustainability issues into the organisation's management process. Therefore, as part of the order issued by the President of the Management Board of Agora S.A. in November 2022. September 7, 2022 an ESG Department was created in the Agora Group.

The head of the department reports at least once a week directly on the effects and status of projects to the member of the Management Board responsible for managing ESG issues within the Agora Group. In order to obtain additional knowledge and support in the area of sustainability, he or she makes use of subject-matter training and the services of external advisors, whose findings and recommendations are presented to the administrative and supervisory bodies. In doing so, it ensures that administrative, management and supervisory bodies are regularly informed of i.a. legislative developments and good practices in the area of building an ESG management process for the entire organisation.

Sustainability issues are regularly raised at meetings of the board of directors, supervisory boards or other decision-making bodies to ensure continuity and consideration of these topics in business and management processes, taking into account actions to achieve the stated goals of Agenda 2030 and the objectives of the Paris Agreement.

GOV-3 INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

The overarching internal regulation regarding the remuneration of the members of the Management and Supervisory Boards of Agora is the **Remuneration Policy for members of the Management and Supervisory Boards** (referred to as the *Remuneration Policy* in this report).

As mentioned in the *Remuneration Policy*, when determining and verifying the remuneration of the members of the Management Board, the Supervisory Board should take into account the experience, the workload required for the proper performance of the function of a member of the Management Board, the scope of duties and responsibilities related to the performance of the function of a member of the Management Board and the level of remuneration for a similar position offered by other entities operating on the market. The level of remuneration of the members of the Management Board is subject to verification by the Human Resources and Remuneration Commission.

The *Remuneration Policy* is constructed on the basis of the Company's financial objectives, taking into account corporate social responsibility (ESG) objectives.

In 2023 Agora has developed its first ever ***Agora Group ESG Strategy for 2023-2027***, which sets out a concrete action plan for achieving sustainability goals across all business segments led by the head of the ESG department. A designated member of Agora's Management Board is directly responsible for overseeing its work and making strategic decisions.

In doing so, the Board aims to ensure compliance with the highest standards of corporate governance, to minimise risks related to social and environmental aspects and to build a positive image as a responsible market participant.

The value of annual bonuses paid to members of the Executive Board in 2023 was not directly linked to the achievement of corporate social responsibility (ESG) activities.

GOV-4 STATEMENT ON DUE DILIGENCE

At the Agora Group, due diligence is understood as a continuous and proactive process aimed at identifying negative influences in the ESG and information area and making decisions within the Group that will eliminate or reduce their occurrence.

Table 1.1 The elements of the due diligence process are described in the individual sections of the statement.

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	S1-1, S2-1, S4-1
b) Engaging with affected stakeholders in all key steps of the due diligence	S1-2, S2-2, S4-2
c) Identifying and assessing adverse impacts	IRO-1, SBM-3
d) Taking actions to address those adverse impacts	S1-3, S2-3, S4-3
e) Tracking the effectiveness of these efforts and communicating	S1-5, S2-5

GOV-5 RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

As part of the risk management process, business area managers at least annually, in accordance with the guidelines of the Management Board, identify in their areas or within several segments the risks that are material to the Agora Group, assess their magnitude and likelihood and the factors to hedge against a given risk. The final product of the risk analysis, i.e. the risk surveys collected, is the **Risk Register** and the **Risk Map**. Each year, the Management Board assesses the completeness of the risks presented, corrects the assessments of the risks and their hedging, and supplements the Risk Register with a strategic risk perspective.

The Audit Committee evaluates the risk management process and the Risk Map, which documents the outcome of this process. For each key risk, the Board of Directors determines whether the risk is sufficiently mitigated and the remaining risk is acceptable to the Agora Group. In other cases, where mitigating actions or controls are judged by the Board to be insufficient, the optimum level of a given risk acceptable to the Board is defined, as well as the path to reach this optimum level: whether by minimising potential losses or by reducing the likelihood of the risk materialising. The materiality level for risks is calculated and approved once a year by the Board of Directors, prior to the start of the risk analysis.

The document describing the principles and framework of the risk management process is the *Risk Management Policy*. Responsibilities are described for positions such as the Board of Directors, risk owners, business area directors, the Director of Internal Audit and Risk Management, employees, the Audit Committee of the Supervisory Board. Roles are described in the *Risk Management Policy*.

- ▶ **Management Board** - within the Agora Group, the Management Board is responsible for defining the strategic directions and creating the conditions and structures to ensure the effective functioning of the risk management process, verifies the completeness of the monitored risks, determines the acceptable level for each risk and accepts responses to risks to ensure the achievement of the Group's objectives.
- ▶ **Business area directors** - identify risks in the areas they manage, assess the magnitude and likelihood of each risk, and determine the means and degree of protection against each identified risk. If they do not own the risks in their business area, they support the effective management and ongoing oversight of these risks.
- ▶ **Risk owners** - are responsible for the day-to-day management of risks, including actions to reduce risks to a level acceptable to the Board. Risk owners are generally the directors responsible for business or functional areas within the Agora Group, or persons designated by them.

Those who do not own the risks in their business area support the effective management and ongoing oversight of these risks.

- ▶ **Audit Committee of the Supervisory Board** - oversees the effectiveness of the risk management system to ensure that key risks are properly identified, managed and disclosed. Approves the internal audit plan based on the Risk Map and monitors management's response to audit findings and recommendations.
- ▶ **Head of Internal Audit and Risk Management:**
 - Coordinates the process of identifying and assessing risks and mitigating factors.
 - Based on the data collected on the risks identified and assessed, it draws up a Risk Map.
 - Based on the map in accordance with the Audit Regulations, it prepares a plan of internal audit tasks.
 - Carries out internal audits in accordance with the audit plan and the Internal Audit Regulations.

Once a year, a risk appetite approach is set, discussed at the Board of Management and then presented to the Audit Committee of the Supervisory Board, for final approval. Once a year, a risk appetite approach is established, discussed at a Board meeting and then presented to the Audit Committee of the Supervisory Board for final approval. Significant risks are entered on the internal audit task list.

As part of the risk analysis, those with roles in the process also identify ESG-related risks. In 2024, the *Risk Management Policy* is planned to be updated to respond to the requirements under the CSRD and take into account ESG factors.

SBM-1 STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Agora S.A. has been listed on the Warsaw Stock Exchange since 1999 and has been operating in the media market for over 30 years. It began its operations in 1989 with the publication of the first issue of the national daily *Gazeta Wyborcza*, which remains one of the most popular daily newspapers in the country to this day.

Today, Agora S.A. and its successively expanding group of subsidiaries is one of the largest media groups in Poland.

The company offers a variety of products and services in areas such as radio, cinema, outdoor advertising, printed press and digital multimedia editions, portals and Internet projects, book and music publishing, film production and distribution, printing activities and catering. As a publisher of independent media, simultaneously running business projects in many areas, Agora provides reliable information and opinions and ensures high quality of entertainment and cultural offer.

In April 2023, it announced the **Agora Group Strategic plans for 2023-2026**, which are based on the organisation's strongest points - the high quality of the content and services offered, an attractive audience, a broad media reach and the advantages associated with the development of digital and subscription solutions to date. Agora Group's aspiration is to further increase the reach and development of its current portfolio of media businesses and to rise to the top three of the largest Polish media companies over the next four years. This development will be based in particular on the Group's strong brands such as Gazeta Wyborcza and Wyborcza.pl, Gazeta.pl, Radio TOK FM, Radio ZET, Helios and AMS. At the same time, the Group's team is constantly ensuring that its media and brands are the first choice for advertising clients in Poland by reaching the most attractive target groups. This is facilitated by a broad commercial offer of media with significant reach - the Agora Group's media reach up to 30 million recipients per month, making their offer extremely competitive for advertisers.

Agora's Management Board intends to maintain and strengthen the operational autonomy of the individual businesses. To this end, it intends to ensure the diversity of the projects they undertake and to be more open to cooperation with other entities, including investors and external partners, in order to realise unique development ideas and to increase the value and popularity of the Agora Group's brands and media. The results and outcomes regarding benefits for customers, investors and stakeholders can be found in the *Agora Group's 2023 financial statements*.

In setting the business directions of all segments, the company's management has set its sights on the growth of the entire Agora Group conducted in a sustainable, socially responsible manner. Therefore, in May 2023, Agora has developed the first sustainability strategy in its history, namely the **Agora Group ESG Strategy for 2023-2027**.

The document takes into account principles and recommendations relating to, among other things, action towards the goals set, compliance with existing standards, as well as the implementation of the UN Agenda 2030 and the demands set out in the Paris Agreement.



Agora integrates sustainability into its business model through activities such as investing in pro-environmental projects, engaging in social issues and promoting innovation and responsible business practices in all areas of its operations.

As part of its environmental activities, Agora is taking intensified measures to reduce its negative impact on the climate by mitigating greenhouse gas emissions into the atmosphere as much as possible. In addition, Agora implements practices from the area of the circular economy (circular transformation), in those business segments where this is applicable [described in detail under the **environmental information** disclosures **E1-E5**].

As an employer, Agora is committed to team development and employee support, providing appropriate working conditions, training and incentive programmes. The Agora Group employs more than 5,000 employees and associates at various levels and locations in Poland. In the coming years, Agora's Management Board plans to implement a new management operating model to ensure that the key competencies of the Agora Group team are effectively utilised and that the entire organisation benefits from the solutions developed [described under **S1-S4** disclosure on **social issues**].

Integrating sustainability issues into its business model, Agora focuses in particular on social and labour aspects by, inter alia, promoting popular science, information and cultural content that builds public awareness of ESG issues, engages in social and philanthropic initiatives with projects for, inter alia, media education, freedom of speech and media pluralism. In addition, it promotes issues of diversity and inclusiveness both in society and in the workplace, and continuously takes action for, among other things, gender equality and the reduction of social inequalities. In its relations with the environment, it focuses on practising ethical standards in its relationships with customers and business partners [described in detail under **ESRS** disclosure **S1-S4 on information on social issues** and **ESRS** disclosure **G1 under information related to corporate governance**]. The basis for setting Agora's strategic objectives in the area of sustainability was the analysis of the elements of the value chains of the various operating segments during the **climate risks and opportunities study**, and the **scenario analysis** performed during the **materiality study** [this process is described within the **ESRS** disclosure **IRO-1**].

An integral part of the ***Agora Group ESG Strategy for 2023-2027*** is the ***AMS Environmental Strategy 2023-2027*** - the first document of its kind in the Polish OOH industry. As part of it, the company plans to intensify

its existing efforts to reduce its carbon footprint across the value chain, develop green urban infrastructure and implement circular economy solutions for advertising materials.

AMS is a pioneer in the application of ecological solutions in the OOH industry. The mission of the organisation is not only to create effective and engaging advertising campaigns, but also to develop a business that is socially responsible, conducive to the rational management of natural resources and thus contributes to the achievement of zero-emission in urban space and supports the creation of smart cities in line with ecological and social values. The company's offer consists of the EKO system of shelters with sedum roofs in 9 cities, EKO Premium Citylight - pro-environmental advertising combined with tree planting, EKO poles - Poland's largest network of solar-powered poles, EKO Busback - urban in-motion advertising on zero- and low-emission public transport vehicles and EKO Backlight - a set of pro-environmental solutions including, among others, the reduction of light smog. AMS's activities in the area of sustainable development are described within the requirements of **ESRS S4-4** and **ESRS E4-E5** disclosures.

Agora Group ESG Strategy for 2023-2027 also covers issues relating to suppliers, business partners and customers, among others, in order to eliminate risks related to human rights violations and the Group's decarbonisation process throughout the value chain.

Graphics: Agora Group value chain

media group
AGORA^{SA}

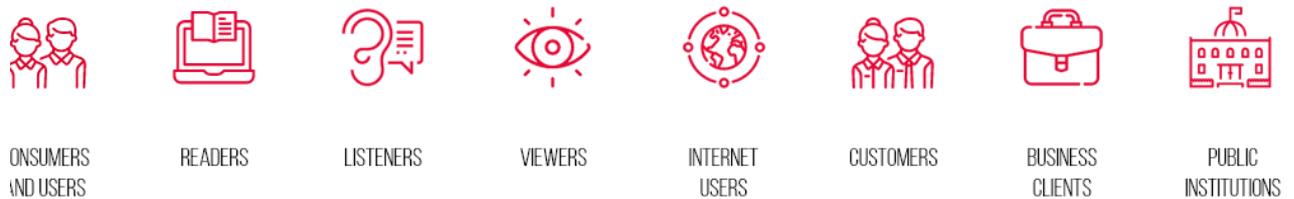
Suppliers of products and services



Key business partners



Clients / customers



Among the entities which cooperate with the Agora Group, there are both business entities and individuals. The largest recipients of products and services provided by the Group's activities are press distributors and Google.

Key suppliers are film copy distributors and paper suppliers. The Group buys paper for its printing operations and the printing of its own titles from several suppliers.

None of the companies in the Agora Group are active in the fossil fuel, chemical production, controversial weapons production or tobacco cultivation and production sectors.

As, at the date of publication of the report, the European Commission has not adopted a delegated act specifying the list of ESRS sectors, this report does not provide the information referred to in paragraphs 40(b) and 40(c) of ESRS 2 of *Commission Regulation (EU) 2023/2772*⁷.

SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

In defining the material ESG issues for the Agora Group for the period 2023-2027, a materiality screening process was carried out in the fourth quarter of 2021, using an extended questionnaire method for the company's various stakeholder groups with a double materiality principle.

The materiality study resulted in a list of material stakeholders, material issues broken down into environmental and climate change issues, social issues including labour issues, corporate governance issues, and a list of material non-financial risks.

The opinions expressed by stakeholders through the established communication channels as during the materiality study, initiated the Agora Group's sustainability management processes.

Table 1.2. Agora Group key stakeholders - purpose and methods of communication

Stakeholder category	Method of engagement	Purpose and topics covered
Users, readers, subscribers, listeners, viewers and individual customers	Mailing. Direct meetings and cultural events. Surveys and opinion polls.	Access to information. Valuable and independent content, promotion of local creators and authors.
Business partners, including corporate clients	Direct meetings.	Business plans, performance indicators.
Suppliers and subcontractors	Ongoing contact and cooperation throughout the year.	Terms of business and timeliness of payment.
Employees and associates	Agora Group's internal communication system.	Working conditions and professional development.

⁷ *Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards - Official Journal of the European Union of 22 December 2023 No. L 2023/2772*

	<p>Internal meetings and special events.</p> <p>Intranet, newsletter and Teams app.</p> <p>Participation in the ESG materiality study and the climate risk study.</p>	
Trade unions	Contact and cooperation on an ongoing basis throughout the year.	Staff issues.
Regulator	Corporate website, Current and periodic reports.	Timeliness and quality of corporate documents reported.
Shareholders and investors	<p>Corporate website.</p> <p>Face-to-face meetings and teleconferences.</p> <p>Outcome conferences. Annual General Meeting of Shareholders.</p>	<p>Agora Group's business strategy, including ESG strategy.</p> <p>Financial performance.</p>
Financial institutions	<p>Corporate website.</p> <p>Face-to-face meetings and teleconferences.</p> <p>Outcome conferences.</p>	<p>Agora Group's business strategy, including ESG strategy and compliance with the EU taxonomy.</p> <p>Financial performance.</p>
Local communities	<p>Mass media and social media.</p> <p>Local events and/or for selected local communities.</p> <p>Activities carried out in collaboration with partners.</p>	<p>Identification of social problems.</p> <p>Creating business value for society.</p>
Intermediaries and dealers	Ongoing contact and cooperation throughout the year.	Terms of business and timeliness of payment.

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

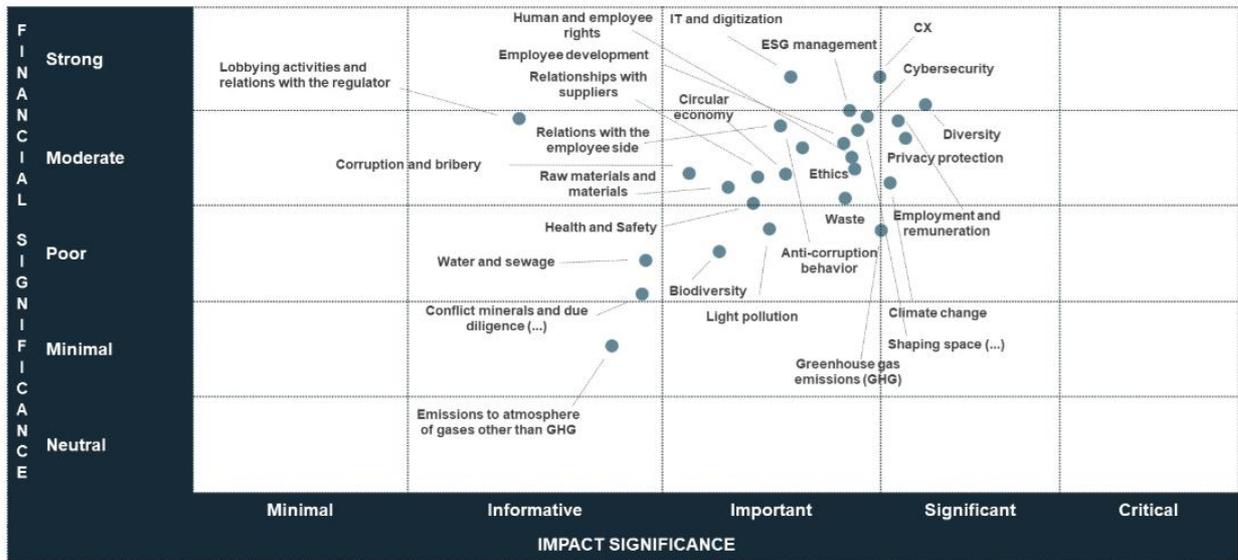
Materiality test: significant impacts

The Agora Group materiality survey was first conducted in 2021 using an extended questionnaire method for different stakeholder groups [a list of identified key stakeholders of the Agora Group is presented as part of the **ESRS** requirement **SBM-2**]. In October 2023, the survey was updated and aligned with the requirements imposed by the EU reporting indicator as required by the EU CSRD.

The study identified 23 relevant ESG themes on the basis of a **dual materiality analysis**. In order to rank all relevant topics, they were divided into 3 groups - **highest, medium** and **standard** prioritisation:

Material ESG issues

Internal and expert perspective



Their layout translates into the scope of disclosures to be reported.

Table 1.3 Significant ESG issues for the Agora Group

ESG issue in ESRS	Issues identified in the materiality test	Impact description	Site The emergence of impacts
CLIMATE CHANGE	Climate change, including greenhouse gas emissions	The Agora Group, like any organisation, affects the climate through greenhouse gas emissions from direct activities such as the burning of fuels in facilities or cars, the use of electricity in offices, the generation of waste and the production of newspapers, books and advertising, among others.	Own operations, Upstream, Downstream
Adaptation to climate change			
Tackling climate change (mitigation)			
Energy			

ESG issue in ESRS	Issues identified in the materiality test	Impact description	Site The emergence of impacts
<p>CIRCULAR ECONOMY</p> <p>Resources brought into the organisation and their use</p> <p>Resources drained from the organisation related to its products and services</p> <p>Waste</p>	<p>Circular economy, including raw materials, materials and waste</p>	<p>The companies comprising the Agora Group represent diverse business models. This brings different challenges and opportunities in the area of implementing circular transformation solutions.</p> <p>Individual units of the Agora Group purchase materials and products used in production processes. The individual companies carry out localised activities in the field of closed-loop economy. An example of this is the action plan in this area, which was created in the subsidiary AMS.</p>	<p>Own operations, Upstream, Downstream</p>
<p>PERSONS WORKING FOR THE COMPANY</p> <p>Working conditions</p> <p>Equal treatment and equal opportunities</p> <p>Other employment rights</p>	<p>Diversity management</p> <p>Employment and wage levels</p> <p>Staff development and education</p> <p>Relations with the labour side and freedom of association</p> <p>Human and workers' rights</p> <p>Health and safety</p>	<p>The Agora Group has a significant impact in terms of equality and diversity in the workplace through relevant internal regulations such as the Code of Ethics.</p> <p>The Agora Group engages in dialogue with its employees. The Group's actions affecting its own employees are implemented in terms of ensuring appropriate employment standards, including ensuring adequate salaries and bridging the wage gap.</p> <p>The Agora Group creates learning opportunities for its team members and provides access to knowledge development and various forms of training.</p>	<p>Own operations</p>
<p>WORKERS IN THE VALUE CHAIN</p> <p>Working conditions of female employees in the value chain</p> <p>Equal treatment and equal opportunities for employees in the value chain</p> <p>Other labour rights of</p>	<p>Relationships with suppliers and subcontractors</p> <p>Conflict minerals and due diligence in the supply chain</p>	<p>The Agora Group conducts its relations with suppliers in a way that aims to prevent negative impacts on employees in the value chain. Agora has a <i>Set of Principles of Conduct for Agora's Suppliers and Subcontractors</i>, which brings together the most important principles of cooperation for suppliers and subcontractors.</p>	<p>Own operations, Upstream</p>

ESG issue in ESRS	Issues identified in the materiality test	Impact description	Site The emergence of impacts
employees in the value chain			
SOCIETIES LOCAL („Affected communities“)	Shaping the information and cultural space	Influence in terms of local communities is realised through engagement in diverse actions to make a positive impact.	Own operations
Economic, social and cultural rights of community members			
Civil and political rights of the community			
Rights of indigenous peoples			
CONSUMERS AND END-USERS	Customer Experience (CX), including IT and digitalisation Shaping the information and cultural space	Consumers and end-users are important stakeholders of the Agora Group. The impact on users is realised through the consumption of content as well as the use of services and goods of Agora Group companies. The Agora Group acts with due diligence in the area of consumer impact, ensuring appropriate standards of service and quality of goods and services offered.	Own operations, Downstream
Impact of information on consumers and end-users			
Personal safety of consumers and/or end-users			
Social inclusion of consumers and/or end-users			
BUSINESS CONDUCT	ESG management Data and information security, including intellectual property (copyright) Tackling corruption and bribery Lobbying activities and relations with the regulator Ethics	Agora is shaping a unique values-based corporate structure. Influence in this regard is realised by ensuring adequate internal policies and procedures and building a management structure capable of proactively managing relevant issues, including ESG issues. Agora actively shapes the environment in which it operates on a daily basis, including through active participation in organisations bringing together specialists in industries relevant to its business.	Own operations, Upstream
Corporate culture			
Protection of whistleblowers			
Political engagement and lobbying			
Supplier relationship management, including			

ESG issue in ESRS	Issues identified in the materiality test	Impact description	Site The emergence of impacts
payment practices			
Corruption and bribery			

Materiality test: significant risks and opportunities

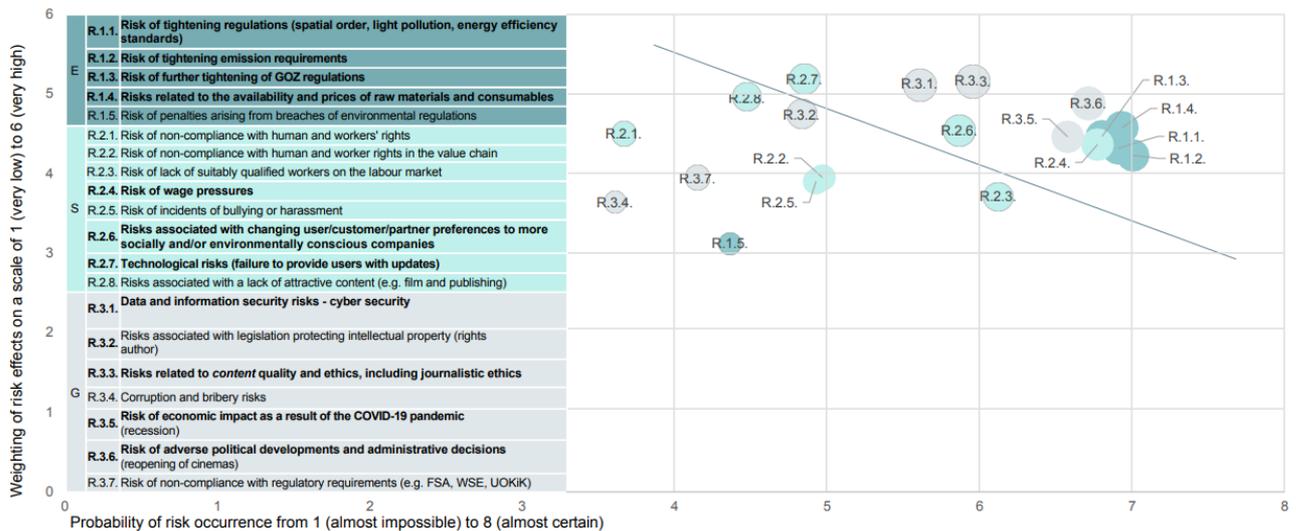
In carrying out the materiality test in the formula applied to ESG risks in 2021, terminology in line with the methodology adopted in the ISO 31000 family of risk management standards was used.

- **Risk factor/trend:** the cause of a risk that can cause it to occur. Risk factors are trends and phenomena external to the organisation and it has no control over their occurrence.
- **Risk:** the effect of uncertainty on an organisation. Risk is a situation in which there is uncertainty about the effect of a certain process and, as such, is neutral for the organisation. Risks can have different effects: they can be positive (opportunities) or negative (threats) - the same risk can also have both positive and negative effects. Risks are measured in two dimensions: their severity (strength of potential effects) and their probability.

The following risks were identified as a result of the materiality test carried out:

Significant ESG risks

Risks whose product of severity and probability exceeded a mean of 24.55 were considered significant.



The results of the estimated risk levels in the materiality study as at 31 December 2023 have not been fully implemented into the internal risk assessment and management system. Instead, the results from the materiality study were taken into account in the process of developing **Agora Group ESG Strategy for 2023-2027**, which is an integral part of the **Agora Group Strategic plans for 2023-2026**.

The Agora Group has developed responses to individual risks in such a way that the impact and probability are reduced to levels acceptable to the company.

The Agora Group conducted a business model resilience analysis under two extreme climate change scenarios. Its results are published in the chapter containing thematic disclosures on climate change. In addition, it conducted an identification and analysis of climate risks and the resulting risks and opportunities in 2022. As a result of this process, risks to the company's development, performance and situation resulting from climate change were defined. The defined risks and resulting opportunities relate to physical and transformational areas, including technology and markets.

A description of the processes to identify and assess material impacts, risks and opportunities is described within the **ESRS** disclosure **IRO-1**.

Internal control and risk management system:

The Agora Group has an internal control system and a risk management system in place.

The main elements of the internal control system are components of the Agora Group's business processes and include:

- ▶ **procedures and rules of procedure concerning**, i.a. delegation of authority and authorisation of decisions, evaluation of business projects, rules for incurring expenses (budgets and acceptance thresholds), recording and processing of business transactions, processes for reporting and controlling transactions and the results of individual business areas;
- ▶ **controls in IT systems** to support the execution of business processes and to monitor the performance of the systems themselves.

The Agora Group has an internal audit function, established and operating in accordance with international standards of professional internal audit practice. Internal audit is an independent and objective activity aimed at adding value and improving the organisation's operational activities. It was established by the Supervisory Board, the Audit Committee and the Management Board to help the organisation achieve its objectives by providing a systematic and structured assessment of the following processes: risk management, control and organisational governance.

The document that governs the work of internal audit is the **Internal Audit Regulations**. It ensures appropriate independence and objectivity and specifies the principles and rights of access to information. At the same time, it establishes rules for the communication of the results of the work and for communication with the Audit Committee, which oversees the internal audit function.

The work is performed in accordance with the plan approved by the Audit Committee, developed on the basis of the Risk Analysis, which is also analysed by the Management Board and serves to assess the situation of the Agora Group. The reports and recommendations issued by internal audit are adopted for implementation by the Management Board and their implementation is monitored. The Audit Committee operating within the Supervisory Board holds regular meetings with the Company's Internal Audit Manager to discuss audit reports and actions taken to mitigate identified risks. The execution of the annual internal audit plan is also monitored on this basis.

Main elements of the risk management system

The primary internal document governing the area of risk management at the Agora Group is the **Risk Management Policy**. Its purpose is to define the principles and framework of the risk management process, to establish the responsibilities of the participants in the process and to define basic risk concepts. An element of the risk management system is a cyclically (once a year) updated **risk register** and a **risk map**, which is the basis for creating annual internal audit plans. The Head of Internal Audit coordinates the process of identifying and assessing risks and risk mitigating actions (safeguards). However, risk management at the Agora Group is

not limited to monitoring the risks marked in the map. The identification, analysis and assessment of risks is carried out on an ongoing basis by the management of the individual business areas and Agora's Management Board.

The risk management system described above refers to risks identified as key risks, primarily those related to the Group's operational activities. Additionally, the Agora Group identifies and considers ESG (*Environmental, Social, Governance*) risks, i.e. those relating to social, employee, environmental, ethical and governance issues. The risks belonging to this group are managed by the substantive units responsible for the respective area.

All identified risks are subject to regular analysis and monitoring, as well as management actions such as following industry standards and guidelines, implementing appropriate internal policies and procedures. This ensures that identified risks are minimised or eliminated and that the organisation is managed effectively. In the individual sections of the report dedicated to the management approach, the procedures and policies that serve to eliminate non-financial risks are identified.

Management of ESG risks, including those related to climate change, is the responsibility of the Company's CEO together with the Board member responsible for ESG issues.

Table 1.4 Main risks identified in 2023

Area	Main risks in the area
ECONOMIC AND LEGAL	<p>The main risks in this area are:</p> <ul style="list-style-type: none"> - Macroeconomic risks related to the economic situation and the demand for products and services (Agora, Agora Group) - Decline in advertising and cinema revenues due to seasonality or administrative decisions (Agora, Agora Group) - Global trends in media consumption (Agora Group) - Changes in consumer and advertiser preferences (Agora, Agora Group) - Risks associated with operating a concessionary business (Agora Group) - Risk of legal changes and regulations concerning users' privacy and data (Agora, Agora Group) - Risk of acting in breach of the law and internal regulations (Agora, Agora Group) - Risk of sudden legislative changes (Agora, Agora Group)
WORKPLACE	<p>Employee issues are one of the most important areas of responsibility, which is why the Agora Group is working to minimise the following risks:</p> <ul style="list-style-type: none"> - Risk of losing key employees and important competences (Agora, Agora Group) - Risk of high staff turnover (costs of recruiting new staff) (Agora, Agora Group) - Risk of unequal treatment of employees (in terms of remuneration, access to training, promotion, etc.) (Agora, Agora Group) - Risk of industrial disputes with employees and employer-employee conflicts (Agora, Agora Group) - Risk of increased wage pressure due to high inflation (Agora, Agora Group)

Area	Main risks in the area
HUMAN RIGHTS	<p>Identified risks regarding human rights issues in the Agora Group:</p> <ul style="list-style-type: none"> - Undesirable behaviour related to the workplace (discrimination, mobbing) (Agora, Agora Group) - breaches of freedom of association and collective bargaining (Agora, Agora Group) - Gross violation of human rights by suppliers (Agora, Agora Group)
ENVIRONMENTAL, INCLUDING CLIMATE RISKS⁸	<p>With regard to the environmental issue, the Agora Group takes into account the risks associated with its operations, primarily in its printing, cinema, catering, outdoor advertising and administrative activities. The main risks are:</p> <ul style="list-style-type: none"> - Operational risks associated with day-to-day operations and negative environmental impacts (Agora, Agora Group) - higher operating costs due to increased prices of raw materials (Agora, Agora Group) - Regulatory risk, related to the adaptation of the business to regulations aimed at tackling global climate change (Agora, Agora Group)
SOCIAL ACTIVITIES	<p>The impact on local communities in all locations of the Agora Group's operations and the involvement in social, cultural, sporting and charitable projects are key issues in the area of corporate social responsibility. Due to the intensity of community involvement, the following risks are possible:</p> <ul style="list-style-type: none"> - Risk of lack of transparency in the allocation of funds (Agora, Agora Group) - Violations of law and human rights as a result of a lack of due diligence in the selection of a social partner (Agora, Agora Group) - Risk of conflict of interest (Agora, Agora Group) - Risk of obtaining results disproportionate to the resources spent (Agora, Agora Group) - Risk of reputational damage as a result of cooperating with a business partner who is detrimental to society/environment (Agora, Agora Group)
SUPPLY CHAIN AND CUSTOMER RELATIONS	<p>The main areas of product liability in the Agora Group relate to marketing communication issues, complaints procedures, and the protection of customers' privacy and personal data. The most significant risks are:</p> <ul style="list-style-type: none"> - Risk of violation of laws or regulations, e.g. data leakage or unauthorised use of data and content. This carries reputational and financial risks (fines, penalties) (Agora, Agora Group) - Supplier credibility risk (Agora, Agora Group) - Liability risks throughout the supply chain (Agora, Agora Group) - Risks related to inadequate protection of recipients' personal data (Agora, Agora Group) - Dependence on a small group of suppliers (Agora, Agora Group)

⁸ The detailed identification and analysis of climate risks is described within the **ESRS E1 Environmental Information** requirement of this report, where the identification and analysis of climate risks and the resulting risks and opportunities are presented in accordance with the **AXIS** (Amplification, eXclusion, Intensification, Seizure) methodology that the Agora Group carried out in 2021/2022.

Area	Main risks in the area
<p>COMBATING CORRUPTION AND FRAUD</p>	<p>The main risks in this area are:</p> <ul style="list-style-type: none"> - Risk of conflict of interest (Agora, Agora Group) - Risk of abuse in relations with business partners and suppliers (Agora, Agora Group) - Risk of corrupt behaviour (also among suppliers and business partners) (Agora, Agora Group)
<p>MEDIA ACTIVITIES</p>	<p>In the modern world, the media play a key role in informing and influencing opinion. All social and economic changes are accompanied by the transformation of mass media and the dynamic development of social media.</p> <p>Challenges of the media industry:</p> <ul style="list-style-type: none"> - reliability of sources (Agora, Agora Group) - independence (Agora, Agora Group) - transparency (Agora, Agora Group) - reliability (Agora, Agora Group) - fact-checking and the fight against disinformation (Agora, Agora Group) <p>Risks associated with media activities:</p> <ul style="list-style-type: none"> - Risk of inadequate information management, public disclosure of contradictory/incorrect/unverified information (Agora, Agora Group) - Lack of transparency (Agora, Agora Group) - loss of public trust (Agora, Agora Group) <p>Risks associated with concessionary activities:</p> <ul style="list-style-type: none"> - loss of concession (Agora Group) - imposition of a penalty (Agora, Agora Group) - Decisions of the Office of Competition and Consumer Protection (UOKiK) declaring the company's practices as limiting competition or violating Polish regulations on competition and consumer protection (Agora, Agora Group) - unfavourable decisions in administrative or judicial proceedings (Agora, Agora Group)
<p>IT RISKS</p>	<p>The main ICT infrastructure risks include:</p> <ul style="list-style-type: none"> - IT business continuity systems capacity (Agora, Agora Group) - Cyber security and data security risks (Agora, Agora Group) - Technology debt risk (Agora, Agora Group)

No new factors emerged during the reporting period covered by the report that would require an update and information on the risks affecting the Agora Group's operational and financial performance can be found in the financial statements, available on www.agora.pl/en/investor-relations.

IRO-1 DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

During the definition of material ESG issues for the Agora Group for 2023-2027 between 2021/2022, a **materiality assesment process** was conducted for the first time, as required by the EU CSRD. In October 2023,

through a process with management, the survey was updated and fully aligned with the requirements imposed by the EU ESRS reporting indicator.

The study was originally conducted using the extended questionnaire method for the company's various stakeholder groups. ESG issues were examined in terms of five parameters in two perspectives (**double materiality principle**): four parameters of impact - the strength of impact, the extent of impact, the likelihood of impact and the possibility of remedying the impact, and one parameter of financial materiality, i.e. the impact of the ESG issue on the development, performance and business situation of the Agora Group. In addition, a study of the materiality of ESG issues from the perspective of the company's external stakeholders (financial institutions, representatives of Agora S.A.'s shareholders and external experts in the ESG area) was carried out, with whom in-depth and structured interviews were also conducted [key stakeholders of the Agora Group are detailed within the **ESRS** disclosure **SBM-2**].

The study considered **financial materiality**, i.e. analysed the impact and risk posed to the Agora Group, and **impact materiality**, i.e. analysed the impact Agora has on environmental and social issues. The results of the various stages of the study were presented to representatives of the Agora Group's Management Board and senior management during a validation workshop and were subsequently consolidated.

The study considered, among other sources of information, the following:

Analysis of source data

- ▶ Comprehensive questionnaire survey conducted on a group of 25 representatives of the board of directors and senior management of the company and the group and a group of 4 external experts
- ▶ Structured interviews with 7 representatives of external stakeholders from the Company's business environment
- ▶ Benchmarking 16 companies in the industry⁹

Matrix analysis of results

The study included components of analysis of area-related risks as well as multidimensional impacts within the areas mentioned. The materiality study was accompanied by a process to develop the organisation's value chain, and the impacts and risks analysed were then related to the processes carried out in the area.

The parameters of **Impact materiality** were assessed in terms of four parameters:

Four parameters of impact materiality			
Power of influence	Scope of influence	Likelihood of impact	The possibility of remedying the effects of
very strong	global/total	current	irreversible
strong	wide	likely	very difficult or very time-consuming
average	average	possible	difficult or time-consuming
weak	concentrated/local	unlikely	repairable, but requiring time and budget
minimum	limited	far	fairly simple to fix and in a short period of time
lack of impact	lack of scope	impossible	

⁹ The peer group study included entities comparable to the Agora Group in terms of location, business model and exposure to risks and opportunities.

- ▶ **The strength of the impact** determines how severe the effects of the impact can be. For environmental issues, it is about environmental damage. For social issues, it is about the negative effects on individuals or groups of individuals.
- ▶ **The scope of the impact** defines how widely the effects of the impact can reach. For environmental issues, this will be the geographical area. For social issues, scope can be understood as the number or percentage of people affected.
- ▶ **The likelihood of an impact occurring** determines whether the impact is currently occurring or is likely to occur in the future.
- ▶ Remediability determines whether it is possible to remedy the impact of the Agora Group's impact on an issue and, if so, how complex, time-consuming or resource-intensive it is.

Financial materiality in relation to the issues under study was assessed on the following scales:

▶ **Impact of the issue on the Agora Group**

While the three parameters of materiality of impact examined how the Agora Group directly or indirectly influences an issue, this case examines how the issue affects today and may in the future affect the operations of Agora's business segments. This impact may relate to, among other things, the present or future value of the company's assets or liabilities (e.g. to an extent that is not recorded in the financial statements).

It can also concern how financial flows will develop; whether the issue will cause the company to record more or less positive or negative financial flows in the future. Finally, it may concern types of capital that the company uses but that are not recorded in the financial statements (e.g. natural, human, intellectual, social or relational capital).

ESG topics for which impact materiality or financial materiality reached a level of important or higher were considered material. The survey and interviews with external stakeholders confirmed the overall results of the materiality assessment and brought additional insight into some ESG topics.

Instead, the results of the materiality study conducted were taken into account in the process of developing the **Agora Group ESG Strategy for 2023-2027**, which forms an integral part of the **Agora Group Strategic plans for 2023-2026**.

Identification and assessment of negative impacts

During the comprehensive materiality study of sustainability issues, it was considered that the most significant negative impact could be caused by the Agora Group in relation to the issues with the highest risk (hazard) in the materiality study carried out.

Issues have been addressed under the requirements of **ESRS E1 SBM-3, ESRS S1 SBM - 3, ESRS S2 SBM-3, S3 SBM-3, ESRS S4 SBM-3:**

Environmental area	Social area	Corporate Governance area
Greenhouse gas emissions	Human and labour rights - Diversity management	Cyber security
Spatial order, light pollution and increased energy efficiency	User and customer preferences and customers, including technological risks (e.g. non-delivery of updates)	Shaping the information and cultural space
Closed-loop economy, including raw materials waste	Relationships with suppliers and subcontractors	Ethics, including journalistic ethics

ESG risks (ESG-related issues that could have a negative impact) were identified as part of the annual risk analysis and entered into the risk register.

IRO-2 DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT

Table: ESRS compliance table

Disclosure no.	Name of disclosure	Chapter in the report
ESRS 2 General disclosures		
BP-1	General basis for preparation of sustainability statements	General information
BP-2	Disclosure in relation to special circumstances	General information
GOV-1	The role of the administrative, management and supervisory bodies	General information
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	General information
GOV-3	Integration of sustainability-related performance in incentive schemes	General information
GOV-4	Statement on due diligence	General information
GOV-5	Risk management and internal controls over sustainability reporting	General information
SBM-1	Strategy, business model and value chain	General information
SBM-2	Interests and views of stakeholders	General information
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General information
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	General information
ESRS E1 Climate change		
GOV-3	Integration of sustainability-related performance in incentive schemes	General information, Environmental information
E1-1	Transition plan for climate change mitigation	Environmental information
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information, Environmental information
E1-2	Policies related to climate change mitigation and adaptation	Environmental information
E1-3	Actions and resources in relation to climate change policies	Environmental information
E1-4	Targets related to climate change mitigation and adaptation	Environmental information
E1-5	Energy consumption and mix	Environmental information
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Environmental information
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Environmental information
E1-8	Internal carbon pricing	Environmental information

Disclosure no.	Name of disclosure	Chapter in the report
ESRS E5 Resource use and circular economy		
E5-1	Policies related to resource use and circular economy	Environmental information
E5-2	Actions and resources related to resource use and circular economy	Environmental information
E5-3	Targets related to resource use and circular economy	Environmental information
E5-4	Resource inflows	Environmental information
E5-5	Resource outflows	Environmental information
ESRS S1 Own workforce		
SBM-2	Interests and views of stakeholders	Information on social issues
SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model	Information on social issues
S1-1	Policies related to own workforce	Information on social issues
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Information on social issues
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Information on social issues
S1-4	Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches	Information on social issues
S1-5	Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities	Information on social issues
S1-6	Characteristics of the Undertaking's Employees	Information on social issues
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Information on social issues
S1-8	Collective bargaining coverage and social dialogue	Information on social issues
S1-9	Diversity metrics	Information on social issues
S1-10	Adequate wages	Information on social issues
S1-11	Social protection	Information on social issues
S1-12	Persons with disabilities	Information on social issues
S1-13	Training and skills development metrics	Information on social issues
S1-14	Health and safety metrics	Information on social issues
S1-15	Work-life balance	Information on social issues
S1-16	Remuneration metrics (pay gap and total remuneration)	Information on social issues
S1-17	Incidents, complaints and severe human rights impacts	Information on social issues
ESRS S2 Workers in value chain		
SBM-2	Interests and views of stakeholders	Information on social issues

Disclosure no.	Name of disclosure	Chapter in the report
SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model	Information on social issues
S2-1	Policies related to value chain workers	Information on social issues
S2-2	Processes for engaging with value chain workers about impacts	Information on social issues
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Information on social issues
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	Information on social issues
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Information on social issues
ESRS S3 Local communities („Affected communities“)		
SBM-2	Interests and views of stakeholders	Information on social issues
SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model	Information on social issues
S3-1	Policies related to affected communities	Information on social issues
S3-2	Processes for engaging with affected communities about impacts	Information on social issues
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Information on social issues
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Information on social issues
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Information on social issues
ESRS S4 Consumers and end-users		
SBM-2	Interests and views of stakeholders	Information on social issues
SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model	Information on social issues
S4-1	Policies related to consumers and end-users	Information on social issues
S4-2	Processes for engaging with consumers and end-users about impacts	Information on social issues
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Information on social issues
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing	Information on social issues

Disclosure no.	Name of disclosure	Chapter in the report
	material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Information on social issues
ESRS G1 Business conduct		
GOV-1	The role of the administrative, supervisory and management bodies	General information
G1-1	Corporate culture and Business conduct policies and corporate culture	Information related to governance
G1-2	Management of relationships with suppliers	Information related to governance
G1-3	Prevention and detection of corruption and bribery	Information related to governance
G1-4	Confirmed incidents of corruption or bribery	Information related to governance
G1-5	Political influence and lobbying activities	Information related to governance
G1-6	Payment practices	Information related to governance

Table: List of data points included in the cross-cutting standards and thematic standards that stem from other EU legislation:

Disclosure requirement and associated data point	Reference to the regulation on disclosure of information relating to sustainable development in the financial services sector (no. p.)
ESRS 2 GOV-1 Gender diversity of board members paragraph 21(d)	p. 7
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21(e)	Not applicable
ESRS 2 GOV-4 Due diligence statement paragraph 30	p. 10
ESRS 2 SBM-1 Participation in fossil fuel activities paragraph 40(d)(i)	Not applicable
ESRS 2 SBM-1 Participation in chemical production activities paragraph 40(d)(ii)	Not applicable
ESRS 2 SBM-1 Participation in controversial weapons activities paragraph 40(d)(iii)	Not applicable
ESRS 2 SBM-1 Participation in tobacco cultivation and production activities paragraph 40(d)(iv)	Not applicable
ESRS E1-1 Transformation plan to achieve climate neutrality by 2050 point 14	p. 39
ESRS E1-1 Units excluded from the scope of the Paris Agreement-adapted benchmarks paragraph 16(g).	Not applicable
ESRS E1-4 Greenhouse gas emission reduction targets point 34	p. 45

ESRS E1-5 Fossil energy consumption disaggregated by source (only for sectors with significant climate impacts) para 38	p. 50
ESRS E1-5 Energy consumption and energy mix point 37	p. 51
ESRS E1-5 Energy intensity linked to activities undertaken in sectors with significant climate impacts paragraphs 40-43	Not applicable
ESRS E1-6 Scope 1, 2, 3 gross greenhouse gas emissions and total greenhouse gas emissions p. 44	p. 34
ESRS E1-6 Gross greenhouse gas intensity paragraphs 53-55	p. 45
ESRS E5-5 Non-recycled waste point 37(d)	p. 53
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	p. 54
ESRS 2 SBM-3-S1 Risk of incidents of forced labour point 14(f)	p. 71
ESRS 2 SBM-3-S1 Risk of child labour cases paragraph 14(g)	p. 71
ESRS S1-1 Commitments on respect for human rights policy paragraph 20	p. 71
ESRS S1-1 Due diligence strategies for issues covered by the ILO Core Conventions 1-8, para. 21	p. 71
ESRS S1-1 Procedures and measures to prevent trafficking in human beings paragraph 22	p. 94
ESRS S1-1 Policy or management system for the prevention of accidents at work paragraph 23	p. 74
ESRS S1-3 Complaint mechanisms point 32(c)	p. 94
ESRS S1-14 Number of work-related deaths and number and rate of work-related accidents paragraph 88(b) and (c)	p. 85
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities or illnesses paragraph 88(e)	p. 88
ESRS S1-16 Unadjusted gender pay gap paragraph 97(a)	p. 85
ESRS S1-16 Excessive level of remuneration of the chief executive officer section 97(b)	Not applicable
ESRS S1-17 Cases of discrimination 103(a)	p. 88
ESRS S1-17 Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guiding Principles paragraph 104(a)	p. 94
ESRS 2 SBM-3-S2	p. 94

Significant risk of child or forced labour in the value chain paragraph 11(b)	
ESRS S2-1 Commitments on respect for human rights policy paragraph 17	p. 95
ESRS S2-1 Policies related to employees in the value chain point 18	p. 95
ESRS S2-1 Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines paragraph 19	p. 95
ESRS S2-1 Due diligence strategies for issues covered by the ILO Core Conventions 1-8, para 19	Not applicable
ESRS S2-4 Human rights issues and incidents related to upstream and downstream value chain paragraph 36	p. 93
ESRS S3-1 Human rights policy commitments, paragraph 16	p. 93
ESRS S3-1 Failure to comply with UN Guiding Principles on Business and Human Rights, ILO Principles or OECD Guidelines paragraph 17	p. 94
ESRS S3-4 Human rights issues and incidents paragraph 36	p. 94
ESRS S4-1 Policy relating to consumers and end-users paragraph 16	p. 93
ESRS S4-1 Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines paragraph 17	p. 94
ESRS S4-4 Human rights issues and incidents paragraph 35	p. 95
ESRS G1-1 United Nations Convention against Corruption paragraph 10(b)	p. 94
SRS G1-1 Protection of whistleblowers point 10(d)	p. 99
ESRS G1-4 Fines for breaches of anti-corruption and anti-bribery legislation paragraph 24(a)	p. 99
ESRS G1-4 Standards on anti-corruption and bribery paragraph 24(b)	p. 99

II. ENVIRONMENTAL INFORMATION

E1 CLIMATE CHANGE

GOV-3 INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

In 2023, annual bonuses paid to company bodies under the provisions of the *Remuneration Policy* were not directly linked to the achievement of sustainability targets.

E1-1 TRANSFORMATION PLAN FOR CLIMATE CHANGE MITIGATION

Agora's Climate Change Mitigation Transformation Plan includes a series of actions focused on mitigating negative environmental and climate impacts and promoting pro-environmental behaviour both within the organisation, in society and in the business environment. It takes into account the transition to a sustainable

economy and limiting global warming to 1.5°C in line with the Paris Agreement and the goal of achieving climate neutrality by 2050.

In 2023, in order to assess its knowledge of Agora's climate impact and verify its existing knowledge in this area, it embarked for the first time on a CDP study [result]. The preparation of the CDP report helps to monitor and measure its progress, but also to position it against the industry concerned, both in Poland, Europe and globally.

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The Agora Group impacts on the climate through greenhouse gas emissions from its direct activities, including the burning of fuels in its facilities or cars, the use of electricity in its offices, the generation of waste and the production of newspapers, books or advertising.

Primary areas of direct impact:

- ▶ non-renewable energy consumption;
- ▶ water consumption and wastewater generation;
- ▶ wastewater and waste production;
- ▶ waste and secondary raw materials management;
- ▶ consumption of natural resources for production purposes.

The actions we are taking to reduce our climate and environmental impact are:

- ▶ investment in renewable energy sources (RES);
- ▶ reducing wastewater and waste production;
- ▶ reducing water consumption;
- ▶ building public awareness of climate change and pro-environmental attitudes.

Specific negative climate and environmental impacts identified in the supply chain:

- ▶ CO₂ emissions from fuel combustion (vehicles);
- ▶ water consumption;
- ▶ energy consumption;
- ▶ waste, lack of full waste segregation;
- ▶ recycle and recover the waste generated by the Agora Group in the production and consumption process.

As a publisher of newspapers, books, films, Internet services and radio programmes or as the owner of one of the largest cinema chains and outdoor advertising companies in Poland, Agora faces various challenges in the area of climate change.

Analysis of climate risks

The study of climate change risks, threats and opportunities was carried out with an external expert company, according to the proprietary AXIS® methodology, which is a variant of the consultant's MAX® (Materiality Assessment Matrix) methodology, adapted to a two- and three-criteria risk study. The analysis of climate risks is carried out in three stages: analysis in the comparison group, questionnaire survey of the expert group, calculation and categorisation of results.

The research methodology assigns values to each opportunity and threat in three dimensions: the probability of their occurrence, the severity, i.e. the weight of potential negative or positive effects should they materialise, and the time horizon. Classification follows, inter alia, the TCFD guidelines.

Threats and opportunities were classified into four categories depending on whether their assessment exceeded the probability and severity boundary values, respectively. As a result of the analysis, they were classified:

- ▶ Group A (Amplification) - high probability and low severity.
- ▶ Group X (eXclusion) - low probability and low severity.
- ▶ Group I (Intensification) - high weighting and low probability.
- ▶ Group S (Seizure) - high probability and high severity.

Risks	Threat / opportunity	Time horizon	Governance
Long-term physical risks			
Epidemic Risks	The threat of an increase in the frequency of epidemics and pandemics.	Short-medium	Maintain the crisis management procedures and business continuity plan and build on the experience of the COVID-19 pandemic period in 2020 and 2021.
Transformational risks			
Risks	Threat / Opportunity	Time horizon	Governance
Technological risks			
Digitisation risks	An opportunity to use advanced analytics and artificial intelligence in product and service development. Opportunity to increase revenue due to changes in demand for online promotion.	Short-medium	Continuing to work in the area of digital innovation, developing Big Data services and continuing to use artificial intelligence in the services and products offered. Development of activities that will increase revenues from the Agora Group's online activities.
Risk of Emissions from Energy Sources	The threat of Poland's continuing high-carbon electricity mix.	Short-medium	Development of measures to optimise electricity consumption and focus on improving energy efficiency. Analysis of investment opportunities in own renewable energy sources.
Market risks			
Risk of Increase in Prices of Raw Materials and Services	The threat of increased costs for raw materials, materials and services caused by other climate risks.	Short-medium	Optimising the use of raw materials and launching projects in the area of the circular economy. Developing long-term relationships with suppliers of key raw materials, materials and services and working closely together to reduce the use of virgin raw materials.

<p>Risk of making access to finance contingent on addressing the climate crisis</p>	<p>Risk of lack of or reduced access to finance if banks or investment funds or insurers do not meet their expectations in addressing the climate crisis.</p>	<p>Medium</p>	<p>Aligning the Agora Group with the expectations of financial institutions in reporting on climate change issues and implementing GHG emissions monitoring. Begin work on Agora Group's ESG strategy and climate policy and preparatory work to establish relationships with rating agencies and ESG data providers.</p>
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Scenario analysis

For the purpose of identifying and assessing climate-related risks and opportunities in 2022. Agora conducted a scenario analysis to examine the resilience of the Agora Group's business model to climate change under two different climate change scenarios (Paris-aligned and Paris-missed¹⁰) in the short (2023-2027), medium (2026-2035) and long (2036-2050) time horizons.

SCENARIO 1: PARIS-ALIGNED	SCENARIO 2: PARIS-MISSED
<p>The scenario assumes the implementation of the <u>Paris Agreement</u> (reducing GHG emissions at a rate that allows the earth's average temperatures to remain within 2 °C), which means that climate change will be contained at a relatively safe level.</p> <p>This scenario is the result of a merger of the IPCC SSP1-1.9 scenario and the IEA Net Zero Emissions by 2050 Scenario (NZE).</p>	<p>This scenario predicts that the pace of GHG emission reductions will be inconsistent with current UN member state declarations (including failing to meet the <u>Paris Agreement</u> targets) and, as a result, climate change will reach the levels predicted by science in the mid-21st century.</p> <p>This scenario is the result of a merger of the IPCC SSP5-8.5 scenario and the IEA's The Stated Policies Scenario (STEPS).</p>
Main conclusions of the scenario analysis for the Agora Group	
<ul style="list-style-type: none"> ▶ Relatively safe level of resilience in the short term ▶ Relatively safe level of resilience in the medium term, provided appropriate adaptation measures are taken ▶ Medium level of resilience over the long term (greatest challenges in the areas of raw materials and materials and waste management) 	<ul style="list-style-type: none"> ▶ Relatively safe level of resilience in the short term ▶ Relatively secure level of resilience in the medium term, with dynamically increasing challenges (primarily in the areas of logistics) ▶ Medium level of resilience in the long term, with critical challenges in several areas (logistics, lack of raw materials or decline in demand for catering-type services)

¹⁰ The two climate change scenarios adopted were developed on the basis of the IPCC's Climate Change 2021 report and the 2022 World Energy Outlook (IEA)

S1: Paris-aligned	S2: Paris-missed
fuzja scenariusza IPCC SSP1-1.9 i scenariusza IEA Net Zero Emissions by 2050 Scenario (NZE)	fuzja scenariusza IPCC SSP5-8.5 i scenariusza IEA The Stated Policies Scenario (STEPS)
► Scenariusz przewiduje, że zrealizowane zostanie Porozumienie Paryskie, czyli zmiany klimatu zostaną powstrzymane na poziomie relatywnie bezpiecznym dla ludzkości	► Scenariusz przewiduje, że tempo redukcji emisji GHG będzie niezgodne z obecnymi deklaracjami państw członkowskich ONZ, w efekcie czego zmiany klimatu osiągną w połowie XXI w. poziom przewidywany przez naukę

W obu przypadkach scenariusze IEA zostały wykorzystane do przewidywania wprowadzanych polityk i regulacji oraz rozpowszechnienia rozwiązań technologicznych, natomiast scenariusze IPCC zostały wykorzystane do projekcji skutków zmian klimatu dla planety, biosfery i ludzkości.



Thanks to the Scenario Analysis, Agora's Management Board has knowledge of possible scenarios for the course of events and changes, which it will use in making strategic decisions.

The impacts on people that may arise from the transition to a climate-neutral economy are addressed in the disclosures **ESRS S1 Owned Workers**, **ESRS S2 Workers in the Value Chain**, **ESRS S3 Affected Communities** and **ESRS S4 Consumers and End-Users**.

E1-2 POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Agora S.A.'s Environmental Policy

Agora has an *Environmental Policy for Agora S.A.*, which is an internal document describing the organisation's existing approach to managing environmental issues. Since 2022, the policy has been revised to finally become the *Agora Group Environmental and Climate Policy* in 2024. The document is fully aligned with the Paris Agreement and follows the ***Agora Group ESG Strategy for 2023-2027*** in terms of taking action on the UN Sustainable Development Goals on climate impact (Goal 13), implementing circular transformation solutions (Goal 12) and on building sustainable cities and communities (Goal 11).

Quality management system policy

The Agora Group owns an offset printing plant in Warsaw, which executes printing orders of the company's press titles and orders from external customers. An exponent of the effectiveness of work in the printing house is the functioning internal Quality Management System is based on implemented procedures for quality control and handling complaints (internal and external non-conformities). In 2018, Agora S.A. has developed a *Quality Management System Policy* and applies principles defining the approach to environmental impact management. A revision of this document took place in July 2020.

Agora Group ESG Strategy for 2023-2027

As part of its environmental efforts, Agora is taking intensified action to reduce its negative impact on the climate, in particular by mitigating greenhouse gas emissions into the atmosphere as much as possible. In this way, it wants to contribute to the decarbonisation of the Group across the value chain. In addition, Agora plans to implement practices from the area of the circular economy (circular transformation) in those business segments where this is applicable. The basis for setting strategic directions in the area of sustainability, including climate action for the Agora Group for 2023-2027 was the UN's 2030 Agenda, in particular Sustainable Consumption and Production (Goal 12) and Climate Action (Goal 13)

AMS Environmental Strategy 2023-2027

Within its framework, AMS is focusing on three key areas, as defined by the UN's 2030 Agenda. These include the development of green urban infrastructure and the implementation of smart cities (Goal 11), the implementation of closed-loop economy solutions (Goal 12), and the creation of low-carbon advertising solutions (Goal 13). These goals include: offering advertising based on energy from low- and zero-emission sources; investing in energy-efficient lighting of advertising media and emission offset projects, including green energy sources; developing green urban infrastructure by, inter alia, developing the largest EKO AMS shelter system in Central and Eastern Europe.

E1-3 ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

The Agora Group's climate action focuses on the objectives set out in the ***Agora Group ESG Strategy for 2023-2027*** and the *AMS Environmental Strategy 2023-2027*, as described in the **ESRS E1 SBM-1 disclosure on strategy, business model and supply chain**.

In response to climate change, media and brands owned by the Agora Group have implemented dozens of environmental initiatives in 2023, including social campaigns, new business initiatives and partnerships undertaken. In addition, the company invests in activities aimed at optimising energy consumption, developing its own sources of renewable energy and purchasing green energy with a guarantee of origin. An example of such activities is AMS's participation in Tauron's EKO Premium programme, where the company uses electricity from 100% renewable sources.

At the 4th Carbon Footprint Summit 2023, AMS was awarded for its long-standing commitment to environmental issues and its support of the Carbon Footprint Foundation's work. In addition, AMS's ECO shelters were awarded the Carbon Footprint Approved certificate.

AMS' ECO shelters are a strategic direction for the organisation's ESG activities. It is implemented in the spirit of nature-based solutions that provide rainwater retention, improve the city's microclimate, reduce CO₂, and are bird and insect friendly.

In addition, AMS was awarded the title of Energy Transformation Leader 2023 for its network of photovoltaic, autonomous poles. The company was recognised for building a nationwide network of super EKO, modern, climate-neutral and energy self-sufficient advertising poles that blend in with the city's space and do not interfere with its underground infrastructure.

E1-4 TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

The strategic objectives set by the Agora Group team for 2023 were presented in the 2022 ESG Report. The implementation of each of these objectives was undertaken during the planned period. Some have been completed, but due to the complexity of the processes, some will continue in 2024.

Specific environmental targets of individual Agora Group businesses implemented in 2023 and targets for 2024.

ADMINISTRATION DEPARTMENT OF AGORA S.A.

TARGETS IN 2023 AND 2024:

OBJECTIVE 1: Analysis of the cost-effectiveness of CHP energy production.

The cogeneration study was put on hold due to high gas price volatility in 2022. The project was suspended in 2023 due to legal and technical risks.

OBJECTIVE 2: Upgrading the installation of control and measurement apparatus and automation, as well as building a new building management system (BMS).
Target in progress.

OBJECTIVE 3: Installation of the first controllers for pumps and fans and installation of control panels.

The project is a multi-phase project and requires investment, but in the near future (up to two years) it will allow further optimisation of the amount of energy consumed. The new system will adapt the installation parameters - such as the temperature and flow rate of the cooling or heating medium, the amount of supply air, etc. - to the current demand of the building, taking into account changing weather conditions and the number of people in the building. As a result, in 2023, Agora reduced its electricity consumption by 10% and its heat consumption by 17%.

These projects will continue into 2024.

HELIOS GROUP:

Helios S.A.

2023 TARGETS:

OBJECTIVE 1: To analyse a long-term option for the purchase of energy with 100 % guarantee of origin from renewable sources (from wind and solar installations) for 30 cinemas of the Helios cinema chain with their own electricity connections.

The objective has been met.

OBJECTIVE 2: Build an optimisation model for cinemas in terms of energy intake and consumption.

The objective has been met.

OBJECTIVE 3: Complete the replacement of the car fleet with hybrids.

The Helios fleet is 40 passenger vehicles of which 35 vehicles are hybrids (versions 4.0 will be successively replaced, 5.0) - 5 vehicles remain to be replaced in 2024.

OBJECTIVE 4: Installation of further network analysers on the specified electrical circuits, which will allow to "see" in real time anomalies in the operation of consumers (appliances) and, consequently, to react quickly to potential high electricity consumption

In 2023, a further five cinemas (Olsztyn, Metropolia Gdańsk, Piła, Rzeszów Galeria, Legnica) were equipped with network analysers. At this point, 40 out of 54 cinemas are metered in detail. The target is further met in 2024.

2024 TARGETS:

OBJECTIVE 1: To include in the control system of the CNWK equipment (air handling/exhaust air handling units) the parameter of the expected price of energy from the DAM (day-ahead market) in an hourly interval. This will achieve symmetry between the generation of green energy and the energy consumption of Helios cinemas, which in turn will result in lower electricity consumption in the cinema network.

OBJECTIVE 2: Initiate a project to acquire electricity storage facilities.

The plan is to recruit a business partner (ReStorage, a company specified with Respect Energy) to install energy storage facilities at three designated locations (large cinemas consuming large amounts of energy - Blue City Warsaw, Gdańsk Forum, Łódź Sukcesja).

OBJECTIVE 3: Installation of a 50KWp PV installation on the façade of the Helios Radom cinema (on a barter basis), which will provide an additional 12% self-consumption energy for this cinema and reduce the electricity bill by PLN 30,000 per year.

OBJECTIVE 4: Compensate reactive inductive and capacitive energy occurring at several locations by installing compensating batteries to increase energy efficiency.

OBJECTIVE 5: Due to the current "plastic" directive, which leads to the elimination of single-use packaging, the cinemas of the Helios chain are switching to the use of reusable or bio-based packaging materials. To find alternative packaging for the aforementioned single-use products and to introduce according to the law from 1 July 2024.

OBJECTIVE 6: Thermomodernisation of the Helios Kielce cinema (the cinema with the highest electricity consumption). Three walls of the cinema building block are gable walls. At the time of handover in 2002, the building met the thermal insulation standard, at present it does not meet the current standard.

OBJECTIVE 7: Equip more cinemas with network analysers.

Pasibus

2023 TARGETS:

OBJECTIVE 1: Ensure partial recycling of waste.

This objective was met by:

- elimination of the paper trays on which meals were served
- elimination of paper that was issued in trays
- withdrawal of additional packaging in the form of a burger box
- limiting the amount of takeaway packaging.

Activities continuing to meet this objective in full will also be carried out in 2024.

We will also focus on changing our packaging policy - introducing predominantly reusable packaging and eliminating plastic packaging.

OBJECTIVE 2: Public campaigns on the environment.

Pasibus continued its collaboration with Zero Waste and Ecocycle.

OBJECTIVE 3: Public campaigns on zero waste activities and non-waste of food.

2023. Pasibus has partnered with Foodsi, whose aim is to combat food waste by providing apps that provide an overview of shops and restaurants in a specific location that have surplus food. Thanks to these partnerships in 2023. Pasibus saved 2915 meals from going to waste.

2024 TARGETS:

Follow-up on:

- ▶ guaranteeing the recycling of packaging;
- ▶ packaging reduction and optimisation in this area;
- ▶ focus on packaging materials - no more plastic packaging

AMS GROUP**OBJECTIVES IN 2023.**

OBJECTIVE 1: Expansion of the EKO shelter network - 'celebrating' the first 100;

In June 2023, the 100th EKO bus shelter in Poland, including the 50th in Warsaw, was put into service for residents in Warsaw's Gołków district. Another pro-environmental bus stop with a green roof, created in partnership between three socially involved parties: the advertiser, the local government and the Out-of-Home advertising operator, is an example of efforts towards an emission-neutral city in the spirit of smart city. It also puts the idea of public-private partnership into practice.

The objective has been fully realised.

Objective 2: Increase to five hours the switch-off time (00:00-05:00) of advertising media during night time;

From the beginning of 2023, AMS has introduced another environmentally friendly solution - on more than 800 backlights, the lighting is switched off from midnight to 5am. This measure reduces CO₂ emissions by 77.5 tonnes, SO₂ emissions by 38.8 kg and NO emissions by 52.9 kg per year, as well as reducing the disadvantageous phenomenon of so-called 'light smog'.

The objective has been fully realised.

OBJECTIVE 3: Expand the number and types of media subject to exemptions;

In 2023, AMS has added the following media types to the pool of media switched off at night: 18 m² billboard, digital outdoor and indoor media.

The objective has been fully realised.

OBJECTIVE 4: Adopt a methodology for counting the carbon footprint of advertising campaigns;

Due to, among other things, changes in ESG reporting standards, the target was not met, particularly in the area of scope 3. The achievement of the target shifts to the following year, particularly in the area of education and cooperation with suppliers and subcontractors, in order to be able to identify scope 3 emissions.

OBJECTIVE 5: Further reductions in fluorescent and halogen lighting in favour of LED technology;

In 2023, AMS replaced the standard light sources on a further 164 media with energy-efficient LED light sources with a total output of 36.6 kW in place of the existing 131.4 kW.

Light sources were replaced in 78 backlights, 9 frontlights and 81 citylights. The above-mentioned measures made it possible to reduce power by a total of 94.8 kW.

The objective has been met.

OBJECTIVE 6: Expand the digital media network;

Digital Citylights from AMS are state-of-the-art digital media using LCD technology. In line with the idea - act advertising & educate content - they display advertising content as well as informative and educational content: urban, sports, cultural, alerts and social campaigns. In 2023, AMS expanded its offer by 49 digital media at bus stops and 201 in shopping malls.

The objective has been met.

OBJECTIVE 7: To carry out work and try to implement the results in the area of the circular economy (GOZ) with regard to increasing the proportion of recycled paper in poster printing, as well as increasing the proportion of posters that are recycled.

In 2023, implementation work was carried out on increasing the share of recycled paper in the printing of advertising posters. The printing of citylight posters with 30% recycled paper was tested. The tests were concluded with a positive evaluation of both technology and quality. The recyclability of posters used in the campaigns was also investigated.

Target met, further work is underway.

TARGETS FOR 2024:

- Expansion of the EKO shelter network - aiming for 200 shelters,
- work to reduce the night-time energy consumption of citylights integrated into bus shelters,
- work on the methodology for counting the carbon footprint of advertising campaigns, particularly for Scope 3 - 2023 target,
- further reductions in fluorescent and halogen lighting in favour of LED technology,
- expansion of the digital media network,
- carry out work and attempt to implement the results in the area of the Closed Circuit Economy with regard to increasing the proportion of recycled paper in poster printing, as well as increasing the proportion of posters that are recycled,
- increasing the volume of energy purchases from utilities originating from RES.

PRINTING ACTIVITIES

OBJECTIVES FOR 2023:

OBJECTIVE 1: Operate the photovoltaic installation and maintain a CO₂ reduction of 70Mg per year through it.

Target achieved. The installation produced 108,486 kWh which is equivalent to 75.94 Mg CO₂

OBJECTIVE 2: Gas combustion savings in the heatset printing process of -5% against a 2022* consumption of 257 201m³, equivalent to 25 Mg CO₂ (1m³ gas = 1.96kgCO₂). *

Target met. The installation was commissioned and produced 102,517 MWh during 2022, which, with an assumed emission factor of 0.7, is equivalent to 71.7 Mg CO₂ per year.

TARGETS FOR 2024:

OBJECTIVE 1: Operate the photovoltaic installation and maintain a CO₂ reduction of 70Mg per year through it.

OBJECTIVE 2: Gas combustion savings in the heatset printing process of -25% against a 2023* consumption of 228 546m³ which is equivalent to 112 Mg CO₂ (1m³ gas = 1.96kgCO₂).

2023 STRATEGIC ENVIRONMENTAL OBJECTIVES AND TARGETS FOR 2024

The key environmental target for 2023 was a 5% reduction in Scope 1 and 2 emissions across the Agora Group.

This target has been met. In the past year, Agora achieved almost 15% emission reductions relative to the base year in the Scope 1+2 market-based [details of this are described within disclosure **E1-5 Energy consumption and energy mix**].

As part of the strategic activities, it is planned to continue the strategic objectives and targets launched in 2023, in the

1. Transforming *Agora S.A.*'s existing Environmental Policy into *Agora S.A.*'s *Environmental and Climate Policy*;
2. Continue to strategically develop the implementation of circular transformation across the Agora Group;
3. Development of environmental criteria for the selection and evaluation of suppliers.

E1-5 ENERGY CONSUMPTION AND ENERGY MIX

The following table presents the energy consumption in 2023 in the Agora Group and the parent company Agora S.A.

Table 2.1 Energy consumption in 2023 in the Agora Group

Energy consumption and energy mix	unit	2022 r.	2023 r.	Y/Y change
Fuel consumption from coal and coal products	MWh	0,00	0,00	-
Fuel consumption from crude oil and petroleum products	MWh	454,32	1 654,14	+264,09%
Fuel consumption from natural gas	MWh	2 631,93	2 406,37	-8,57%
Fuel consumption from other fossil sources	MWh	0,00	0,00	-
Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources	MWh	51 862,77	46 818,42	-9,73%
Total fossil energy consumption	MWh	54 949,02	50 878,93	-7,41%
Share of fossil sources in total energy consumption	%	87,59%	98,70%	+11,11
Energy consumption from nuclear sources	MWh	0,00	0,00	-
Share of energy from nuclear sources in total energy consumption	%	0,00%	0,00%	-
Consumption of fuel from renewable sources, including biomass (also including industrial and municipal bio-waste, biogas, renewable hydrogen, etc.).	MWh	0,00	0,00	-

Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources	MWh	7 592,72	669,25	-
Consumption of self-generated renewable energy produced without fuel	MWh	191,84	0,00	-100,00%
Total energy consumption from renewable sources	MWh	7 784,56	669,25	-91,40%
Share of renewable sources in total energy consumption	%	12,41%	1,30%	-11,11
Total energy consumption	MWh	62 733,58	51 548,17	-17,83%

*In the table above, under the heading consumption of purchased or procured electricity, heat, steam and cooling from renewable sources, there was a change in the method of data presented between 2022 and 2023. The data for 2022 included the percentage of energy from renewable sources by fuel structure of energy suppliers. The data for this item for 2023 only includes renewable energy supplied with a Guarantee of Origin. For energy supplied without a relevant instrument such as: renewable energy purchase contract, standard green energy tariff, market-based instruments such as a Renewable Guarantee of Origin; total energy was classified according to the prudence approach indicated in ESRS standard E1 AR 32. (j) to the item **Total consumption of energy from fossil sources**.*

The results for 2023 show a significant decrease in total energy and fuel consumption of 17.83%. The decrease in electricity consumption observed in cinema operations and the decrease in the use of natural gas in Agora S.A.'s printing plant operations (down 8.57% on 2022) are largely responsible for this change.

Table 2.2: Energy consumption in 2023 at Agora S.A.

Energy consumption and energy mix	Unit	2022	2023	Y/Y change
Fuel consumption from coal and coal products	MWh	0,00	0,00	-
Fuel consumption from crude oil and petroleum products	MWh	89,38	78,48	-12,20%
Fuel consumption from natural gas	MWh	2 629,52	2 311,30	-12,10%
Fuel consumption from other fossil sources	MWh	0,00	0,00	-
Consumption of purchased or procured electricity, heat, steam and cooling from fossil sources	MWh	19 863,40	17 340,43	-12,70%
Total fossil energy consumption	MWh	22 582,31	19 730,21	-12,63%
Share of fossil sources in total energy consumption	%	90,45%	100,00%	+9,55
Energy consumption from nuclear sources	MWh	0,00	0,00	-
Share of energy from nuclear sources in total energy consumption	%	0,00%	0,00%	-
Consumption of fuel from renewable sources, including biomass (also including industrial and municipal bio-waste, biogas, renewable hydrogen, etc.).	MWh	0,00	0,00	-
Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources	MWh	2 194,08	0,00	-100,00%
Consumption of self-generated renewable energy produced without fuel	MWh	190,99	0,00	-100,00%
Total energy consumption from renewable sources	MWh	2 385,07	0,00	-100,00%
Share of renewable sources in total energy consumption	%	9,55%	0,00%	-9,55
Total energy consumption	MWh	24 967,38	19 730,21	-20,98%

In the table above, under the heading Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources, there was a change in the method of data presented between 2022 and 2023.

The data for 2022 included the percentage of energy from renewable sources by fuel structure of energy suppliers. **The data for this item for 2023 only includes renewable energy supplied with a Guarantee of Origin.** For energy supplied without a relevant instrument such as: renewable energy purchase contract, standard green energy tariff, market-based instruments such as a Renewable Guarantee of Origin; total energy was classified according to the prudence approach indicated in ESRS standard E1 AR 32. (j) to the item **Total consumption of energy from fossil sources.**

Agora has been using renewable sources since April 2020. The company has 4 photovoltaic installations - two on the roof of Agora's Warsaw headquarters at 8/10 Czerska Street and, from 2022, two on the premises of the printing house at 27 Daniszewska Street in Warsaw. The results of green energy production from their operation in 2023 contributed a total of 193.73 MWh (including Czerska - 85.24 MWh and the printing house - 108.49 MWh).

Table 2.3. Energy intensity for the Agora Group in 2023

Energy intensity per net revenue	Unit	2022	2023	Y/Y change (%)
Total energy consumption per net revenue	MWh/1 million PLN	56,06	36,19	-35,44%

In the energy intensity indicator, a significant decrease of 35.4% is observed with respect to 2022.

E1-6 GROSS SCOPE 1, 2 AND 3 GREENHOUSE GAS EMISSIONS AND TOTAL GHG EMISSIONS

GHG emissions are calculated in the Agora Group from 2021 and are calculated according to the standards and methodologies of *The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard Revised Edition* and *GHG Protocol Scope 2 Guidance*. The organisational boundaries include all companies within the Agora Group. The operational boundaries include *Scope 1* emissions, i.e. emissions related to the direct use of fuels in buildings, vehicles and installations owned or controlled by the Group and emissions related to refrigerant volatilisation, and *Scope 2* emissions, i.e. indirect emissions related to the Group's consumption of purchased electricity and thermal energy. Calculations for *Scope 2* were performed according to two methods: *location-based* and *market-based*. For the *location-based method*, electricity consumption was multiplied by the average emission factor for Poland in 2022⁷. On the other hand, in the calculation with the *market-based method*, the energy consumption attributed to individual sellers was multiplied by the emission factor published/reported by these energy sellers. In cases where no specific energy seller was given, energy consumption was multiplied by the average for Poland. When calculating greenhouse gas emissions for heat energy, the *market-based* method was used and an average emission factor for Poland was adopted.

Emissions are given in tonnes of carbon dioxide equivalent (Mg CO₂ e). This measure includes total greenhouse gas emissions expressed through carbon dioxide emissions having the same environmental impact according to the *Global Warming Potential* (GWP).

In 2022. The Agora Group of Companies has for the first time estimated and calculated *Scope 3* GHG emissions, i.e. all indirect emissions along the value chain.

Limits of reported emissions

- The calculation for the Agora Group includes all subsidiaries and the parent company according to operational control. The calculation excludes companies that did not have significant operational activities in 2023 that affect the material consumption of fuel and energy.

The Agora Group reports Scope 1 and Scope 2 emissions according to the GHG Protocol methodology.

- ▶ Direct emissions (Scope 1) arise from the combustion of fuels in stationary or mobile sources owned or supervised by the company, as well as from process emissions or refrigerant leaks.
- ▶ Indirect emissions (Scope 2) arise from the consumption of imported electricity, heat, process steam and cooling. We calculate Scope 2 emissions using two methods. The location-based calculation method takes into account the average energy intensity of the grid to which the energy consumer is connected. The *market-based* calculation method aims to show the informed choice of energy supplier - it presents emissions calculated according to supplier-specific intensity.

Calculation methodology and assumptions made - Scope 1 and 2

- ▶ Emissions were calculated using the tools provided by the GHG Protocol (<https://ghgprotocol.org/calculation-tools>), calculations were made for the six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆) included in the GHG Protocol, emission values are given in tonnes (Mg) of the standard carbon dioxide equivalent unit (CO₂e);
- ▶ For the calculation of Scope 2 *location-based emissions*, average emission intensity factors for electricity and heat generation provided by the National Balancing and Emissions Management Centre were used. Emissions from the generation of electricity consumed were calculated according to the *market-based* method, where for electricity (for which the seller was known), the emission factors provided by the seller were used, and for energy from RES confirmed by Guarantees of Origin, a factor of 0 kg CO₂e/kWh was adopted;
- ▶ With regard to thermal energy, indicators for the intensity of thermal energy generation were adopted in accordance with the data reported for Poland by the Energy Regulatory Office;
- ▶ The greenhouse effect coefficients (GWP, Global Warming Potential) used in the calculations are in accordance with the Fifth Assessment Report of the IPCC (AR5, The Fifth Assessment Report of the IPCC).

Table 2.4: Calculation methodology and assumptions made - Scope 3

UPSTREAM	
Purchased products and services	Category classified as material. Reported quantities of material raw materials and materials, reported data on purchased posters in the advertising segment and extracts from Agora CG's accounting systems were used for the calculations. The expenditure method and the <i>average-data method</i> were used to calculate emissions. For the expenditure method, indicators from the ADEME Full Carbon Base of indicators were used. Category calculated for 2023. WRAP's Scope 3 Protocols for Food and Drink were used to calculate for food products. For other purchased products not calculated using the expenditure method, indicators from the Ecoinvent database and Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities were used.
Investment goods	The full list of fixed assets purchased in the 2023 financial year, provided by the Agora CG, was used for the calculation. The expenditure method and indicators from the ADEME Full Carbon Base were used to calculate emissions. Category calculated for 2023.

UPSTREAM	
Fuel and energy activities (outside scope 1 and 2)	Agora Group fuel and energy consumption data from the ESG data monitoring system conducted for non-financial reporting was used for the calculations. Indicators from the DEFRA (2023) and IEA (2022) databases were used to estimate emissions from this category. Emissions from fossil fuel extraction and processing (Well-To-Tank, WTT) for direct consumption in the Group's operations and for the generation of the energy consumed, as well as energy transmission and distribution losses (direct and WTT) were included in the calculations.
Transport and distribution in the upstream	Category considered significant, data acquisition in progress. Planned to calculate emissions in next reporting cycle.
Waste generated in operations	Agora Group fuel and energy consumption data from the ESG data monitoring system conducted for non-financial reporting was used for the calculations. Emission intensity factors were derived from the DEFRA (2023) database and took into account the type of waste and how it was managed. Emissions associated with the reuse of the waste were assumed to be traceable to other management options. For emissions for both 2022 and 2023, factors were applied to differentiate between the different waste management processes, which influenced, the need to recalculate the category for 2022.
Business trips	Source data included the Agora Group and was sourced from delegation management information systems and included travel by air, rail and bus. Business car travel within the Agora Group is undertaken using company vehicles, hence the emissions associated with these were included in Scope 1. Emission factors were sourced from the DEFRA (2022) database. Emissions associated with overnight stays were estimated based on metrics from the Hotel Footprinting Tool. Due to the low contribution of this category's emissions in Scope 3 for 2022 and the lack of significant changes to the Group's employee delegation model, this category was not calculated in 2023.
Employee commuting	Data from employee surveys completed at the Agora Group were used to estimate emissions from this category. The annual emissions of each respondent were estimated based on the answers given regarding the frequency of commuting to work, taking into account remote working, distance travelled and choice of mode of transport. Emission factors from the DEFRA (2022) database were used for the calculations. The phenomenon of carpooling was taken into account. Then, based on the data from the metric, average metrics were calculated for each employee group, which were then extrapolated to all Agora Group employees. Due to the lack of significant changes that could significantly affect employees' commuting habits, the category was not calculated for 2023.
Upstream leased assets	Category considered irrelevant
DOWNSTREAM	
Downstream transport and distribution	Category considered significant, data acquisition in progress. Planned to calculate emissions in next reporting cycle.
Processing of products sold	Category deemed irrelevant.
Use of products sold	Category considered significant, data acquisition in progress. Planned to calculate emissions in next reporting cycle.
End-of-life product handling	Category considered significant, data acquisition in progress. Planned to calculate emissions in next reporting cycle.
Downstream leased assets	Category deemed irrelevant.

UPSTREAM	
Franchise	Category deemed irrelevant.
Investments	Category considered significant, data acquisition in progress. Planned to calculate emissions in next reporting cycle.

Table 2.5: Scope 1, 2 and 3 greenhouse gas emissions in the Agora Group

	Unit	Retrospective				Milestones and base year			
		Base year 2022	2022	2023	Y/Y change (%)	2025	2030	2050	Y/Y change (%)
Greenhouse gas emissions in terms of 1									
Gross greenhouse gas emissions in scope 1	MgCO ₂ e	1 859,24*	1 859,24	1 633,91	-12,12%	1 580,35	-	-	-
Share of Scope 1 greenhouse gas emissions from regulated ETS	%	-	-	-	-	-	-	-	-
Greenhouse gas emissions in terms of 2									
Gross Scope 2 greenhouse gas emissions by location-based method	MgCO ₂ e	-	34 043,92	30 471,38	-10,49%	-	-	-	-
Gross Scope 2 greenhouse gas emissions by market-based method	MgCO ₂ e	32 390,4	32 390,44	28 246,69	-12,79%	19 434,24	-	-	-
Significant emissions of calorific gases in terms of 3									
Total indirect greenhouse gas emissions (scope 3)	MgCO ₂ e	35693,93	35693,93	36858,19	3,26%	32124,537	-	-	-
1 Purchased goods and services	MgCO ₂ e	18 940,68	18 940,68	22 794,17	20,35%	-	-	-	-
[Factual subcategory: Cloud computing and data centre services	MgCO ₂ e	-	-	-	-	-	-	-	-

	Unit	Retrospective				Milestones and base year			
		Base year 2022	2022	2023	Y/Y change (%)	2025	2030	2050	Y/Y change (%)
2 Investment goods	MgCO ₂ e	5 028,99	5 028,99	4 226,23	-16,0%	-	-	-	-
3 Fuel and energy activities (not covered under 1 or 2)	MgCO ₂ e	10 160,40	10 160,40	7 791,47	-23,32%	-	-	-	-
4 Upstream transport and distribution	MgCO ₂ e	-	-	-	-	-	-	-	-
5 Waste generated by the operation	MgCO ₂ e	595,07**	595,07	1 077,53	81,08%	-	-	-	-
6 Business trips	MgCO ₂ e	48,32	48,32	48,32***	-	-	-	-	-
7 Employee commuting	MgCO ₂ e	920,47	920,47	920,47**	-	-	-	-	-
8 Leased upstream assets	MgCO ₂ e	-	-	-	-	-	-	-	-
9 Downstream transport	MgCO ₂ e	-	-	-	-	-	-	-	-
10 Processing of products sold	MgCO ₂ e	-	-	-	-	-	-	-	-
11 Use of products sold	MgCO ₂ e	-	-	-	-	-	-	-	-
12 End-of-life processing of products sold	MgCO ₂ e	-	-	-	-	-	-	-	-
13 Leased downstream assets	MgCO ₂ e	-	-	-	-	-	-	-	-
14 Franchises	MgCO ₂ e	-	-	-	-	-	-	-	-
15 Investments	MgCO ₂ e	-	-	-	-	-	-	-	-
Total greenhouse gas emissions									
Total greenhouse gas emissions (location-based)	MgCO ₂ e	0,00	35 903,16	31 351,56	-12,68%	-	-	-	-
Total greenhouse gas emissions (market-based)	MgCO ₂ e	0,00	34 249,68	29 126,87	-14,96%	-	-	-	-

*The base year in Scope 1 for emissions in the Agora Group has been corrected to include in the base year also the category of emissions related to air conditioning and refrigeration.

**A correction has been made to the indicator for Category 5 Scope 3 in terms of a change in the emission factor applied to landfilled waste and other forms of waste management.

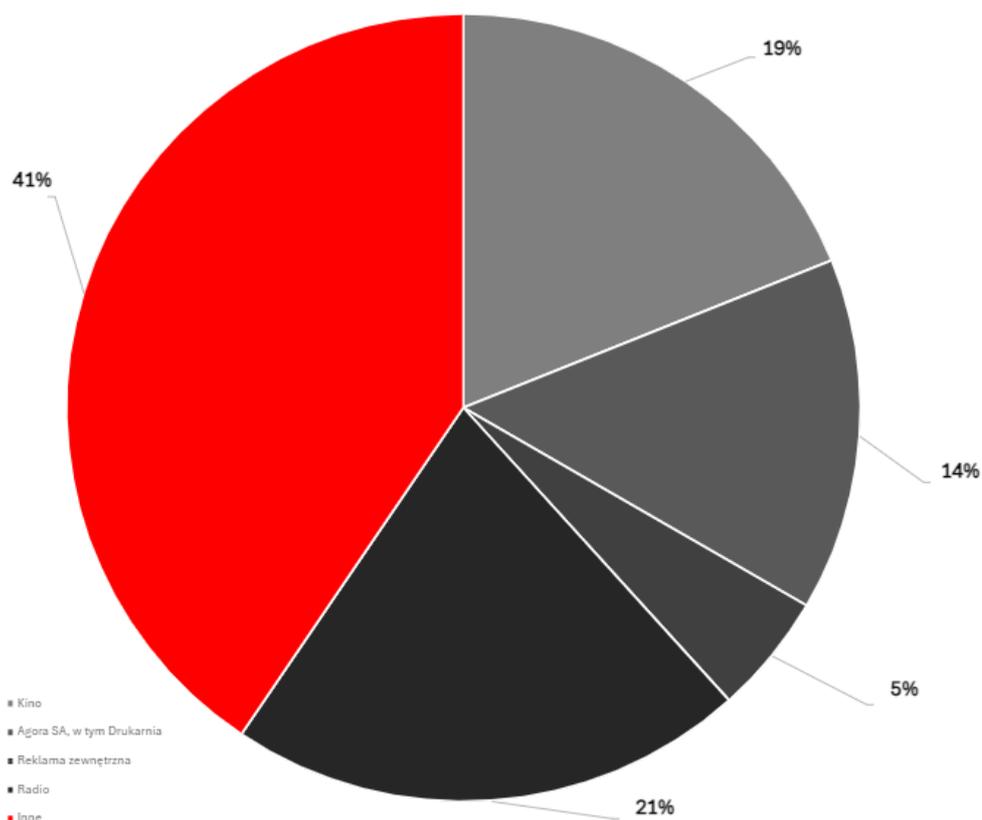
*** Categories: 6 Business travel 7 Employees' commuting were not subject to recalculation in 2023 due to the absence of material changes likely to have a significant impact on the nature of the

In the ESG Strategy 2023-2027, the Agora Group has set an emissions reduction target in Scope 1 for 2025 of -15% relative to the base year, and in Scope 2 of -40% relative to the base year. The group's long-term reduction targets relate to 2027, not designated as a milestone in the ESRS standards. In 2023, the group achieved almost 15% emission reductions relative to the base year in the Scope 1+2 market-based. The reduction was achieved through reduced demand for electricity, heat and natural gas, as well as an improved mix of delivered electricity.

Table 2.6: Scope 1 and 2 greenhouse gas emissions at Agora S.A.

	Unit	Base year 2022	2022	2023	Y/Y change (%)
Scope 1 and 2 greenhouse gas emissions					
Gross greenhouse gas emissions in scope 1	MgCO e ₂		732,11	679,38	-7,20%
Gross Scope 2 greenhouse gas emissions by location-based method	MgCO e ₂		11 849,19	10336,42	-12,77%
Gross Scope 2 greenhouse gas emissions by market-based method	MgCO e ₂		11 293,10	10083,88	-10,71%
Total greenhouse gas emissions					
Total greenhouse gas emissions (location-based)	MgCO e ₂	0,00	12 581,30	11 015,80	-12,44%
Total greenhouse gas emissions (market-based)	MgCO e ₂	0,00	12 025,21	10 763,26	-10,49%

Udział biznesów w emisjach GHG Scope 1+2 marketbased



In 2023, there is a 7.2% decrease in Scope 1's GHG emissions at Agora S.A. compared to the previous year, due to reduced natural gas consumption at the printing plant, also reported in the fuel and energy statements.

Table 2.7 Scope 1 and 2 greenhouse gas emissions in the Agora Group

GHG intensity per net revenue	Unit	2022	2023	Y/Y change (%)
Total greenhouse gas emissions (location-based) per net revenue	MgCO ₂ e/1 million PLN	32,1	22,5	-29,74%
Total greenhouse gas emissions (market-based) per net revenue	MgCO ₂ e/1 million PLN	30,6	21	-31,45%

E1-7 GHG REMOVALS AND GHG USING AND MITIGATION PROJECTS FINANCED WITH CARBON CREDITS

E1-7 Greenhouse gas avoidance and mitigation projects financed with carbon credits

E1-8 INTERNAL CARBON PRICING

Agora did not carry out greenhouse gas absorption and mitigation projects financed by carbon credits in 2023 and does not use internal carbon pricing systems.

E5 RESOURCE USE AND THE CIRCULAR ECONOMY

In contrast to the traditional - linear - model, the circular economy (circular economy, GOZ) is a production and consumption model based on sharing, borrowing, reusing, repairing, renewing and recycling existing materials and products for as long as possible - with the aim of extending their lifespan in this way.

Given the diversity of the Agora Group's activities (cinema, publishing, press, internet, outdoor, radio and catering), the project began with the creation of a GOZ roadmap for the Outdoor Advertising (AMS) segment.

E5-1 POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

The Agora Group does not have a circularity policy. Issues of the circular economy (GOZ) will be addressed in the *Agora Group's Environmental and Climate Policy* and internal procedures adapted to the specific activities of the Agora Group companies.

E5-2 ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

One of the environmental goals set for 2023 by the Agora team was to identify areas of the Agora Group's business where it is possible to start implementing a circular transformation. Following an analysis in October 2022, it is known that the Agora Group's transformation towards a circular economy is possible in and can bring a number of benefits - these include: reduced CO₂ emissions, reduced pressure on the extraction and purchase of raw materials and materials, and reduced emissions of toxic substances. In 2023, when working on the ESG Strategy, these objectives were concretised and described within **ESRS disclosure E5-3 Objectives related to resource use and the circular economy**.

E5-3 TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Agora Group ESG Strategy for 2023-2027

ESG Strategy for 2023-2027 describes an operational objective related to sustainable waste management. This objective describes actions to increase the percentage of waste sent for reuse or recycling across the Group. The percentage target is to be 65% in 2025 and 75% in 2027.

The strategy also identifies a target linked to product life extension, which consists of two measures of target achievement:

- ▶ Developing a *GOZ Roadmap* - a plan to implement and then carry out the implementation of closed-loop economy principles in possible areas of the Agora Group. The design of this process is planned for late 2024 and early 2025.
- ▶ Implementation of *GOZ Roadmap* projects in all segments of the Agora Group. In 2023, cyclical implementation of the target in the following years is planned.

AMS Environmental Strategy for 2023-2027

AMS has its own *AMS Environmental Strategy*, which covers the period 2023-2027. The objective, which also appears in the ***Agora Group ESG Strategy for 2023-2027***, is to identify and use indicators that demonstrate a real impact on the circular economy. This is to consist of:

- ▶ Development of a tool to calculate the campaign's carbon footprint. Testing and implementation of the tool into practice is planned for 2025;
- ▶ making CO₂ information available for the campaign in question. The target is to be met in 2025.
- ▶ increasing the circularity of posters by increasing the proportion of recycled paper in new posters,
- ▶ Increased recycling of paper posters in 2025.
- ▶ increasing the proportion of recycled raw materials in the production of vinyl posters
- ▶ increase recycling of vinyl posters by 2027.

Development and publication of an AMS factsheet on good practices in the circular economy to be made available to customers. An annual review of the factsheet and possible modification of the document is planned;

The biggest point of impairment for AMS in 2023 is advertising material, due to its single-use nature. This poses a major challenge to eliminate and generates large amounts of waste. AMS assumes that this problem is solved by the circularity of posterisation (life cycle extension).

AMS plans to count its own carbon footprint from 2024 in order to prove that it will be reduced all the time. At the moment, information is being collected from suppliers and subcontractors. This is a difficult process, especially as many of them are not aware of what sustainability is. For the most part, AMS is meeting with a willingness to cooperate, so the likelihood of achieving this goal is assessed as high.

E5-4 RESOURCE INFLOWS

Products that are introduced to the organisation include fluorescent tubes, air conditioners, photovoltaic panels, aluminium moulds, LED modules and LED lamps for the lighting of advertising media, poster glue, aluminium profiles for the repair of shelters, polycarbonate for the repair of advertising media, glass for the repair of bus shelters and citylights.

Table 2.8. Resource use and the circular economy in the Agora Group

Resources introduced into the organisation	Unit	2023
Total weight of products introduced into the organisation	Mg	175,14
Total weight of technical materials brought into the organisation	Mg	7 668,26
including the total weight of reused or used components, reused intermediates and secondary raw materials used in the production of the company's products and services (including packaging)	Mg	0,00
Total mass of biological materials introduced into the organisation	Mg	8 464,20

including from sustainable sources	Mg	0,00
Total mass of technical and biological materials introduced into the organisation	Mg	16 132
Total mass of products, technical and biological materials	Mg	16 308
Percentage of biological materials from sustainable sources	%	0,00
Percentage of materials reused	%	0,00

Following the analysis of the reported indicator, product and material categories have been matched as far as possible to the layout reported in previous years. Data is collected in tonnes (Mg).

For selected, reported information, the Agora Group had actual data extracted from invoices or other documents (such as product data sheets).

The Group did not identify any risks associated with double counting in the year under review.

E5-5 RESOURCE OUTFLOWS

The companies of the Agora Group, with respect to 100% of the waste they generate, have entered into agreements obliging the recipients to recycle or dispose of such waste. Each of the companies in the Agora Group maintains a waste management programme and, in accordance with legal and reporting requirements, submits information on it to the relevant authorities.

Non-hazardous waste is segregated and subject to separate collection, in accordance with the local municipal waste management system. Hazardous and non-hazardous waste is handed over to the appropriate external entities for disposal.

- production of newspapers (printing works)
- campaigning, e.g. poster-making (AMS)
- catering services (Pasibus, Heslios)
- office activities (administration of Agora's buildings)

The largest waste category 'Non-hazardous' (98.8%) consists of waste associated with the operation of cinemas (52.0%).

For selected, reported information, the Agora Group had actual data extracted from invoices or other documents (such as product data sheets).

Table 2.9 Resources moved out of the organisation and the circular economy in the Agora Group

Resources introduced into the organisation	Unit	2023
Resources drained from the organisation		
Waste destined for recovery		
Hazardous waste	Mg	25,76
Preparation for re-use	Mg	0,00
Recycling	Mg	25,72
Other recovery processes	Mg	0,04
Non-hazardous waste	Mg	1 557,79
Preparation for re-use	Mg	0,00

Recycling	Mg	1 390,91
Other recovery processes	Mg	166,88
Total amount of waste sent for recovery	Mg	1 583,55
Waste sent for disposal		
Hazardous waste	Mg	17,24
Burning	Mg	0,00
Storage	Mg	0,00
Other disposal processes	Mg	17,24
Non-hazardous waste	Mg	2 012,67
Burning	Mg	0,00
Storage	Mg	0,00
Other disposal processes	Mg	2 012,67
Total amount of waste sent for disposal	Mg	2 029,91
Total amount of radioactive waste	Mg	0,00
Total amount of waste generated	Mg	3 613,45
Total amount of waste not recycled	Mg	2 196,82
Percentage of waste not recycled	%	60,80%

COMPLIANCE WITH THE EU TAXONOMY

Introduction

In this report, the Agora Group discloses for the second time information on compliance with the so-called EU Taxonomy of Environmentally Sustainable Activities. The related obligations were introduced by Regulation (EU) 2020/852 of the Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investments¹. The aforementioned Regulation, abbreviated as the EU Taxonomy (systematics), transposes the European Union's climate and environmental objectives into technical criteria for assessing whether an activity can be considered sustainable in relation to the 6 environmental objectives:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;
- the transition to a circular economy;
- pollution prevention and control;
- protecting and restoring biodiversity and ecosystems.

The taxonomy is therefore a classification system to examine and reveal the extent to which the agora group's activities are environmentally sustainable.

All activities carried out by the Agora Group can be assigned to one of three categories:

- a qualifying activity for which it has been established that the Technical Eligibility Criteria and Minimum Guarantees are met - it is an environmentally sustainable activity;
- Systematically eligible activities for which no Technical Eligibility Criteria have been tested, or at least one of the criteria has been found not to be met, or the Minimum Guarantees have not been met - this is a systematically eligible but environmentally unsustainable activity; non-systematically eligible activities for which no Technical Eligibility Criteria exist (this category includes, inter alia, those

activities for which criteria will emerge in the future and the activity will then be eligible for the Taxonomy).

Technical Qualification Criteria (TKKs) are detailed criteria that make it clear whether an activity makes a significant contribution to one environmental objective and does not cause serious harm to other environmental objectives. The TKKs are contained in two pieces of legislation:

Commission Delegated Regulation (EU) 2021/2139 of 04 June 2021. (the so-called 'Climate Delegated Act'), which, since its issuance, has been amended twice by the following legislation: *Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022, which introduced requirements for energy generation activities using gaseous fuels and nuclear energy,*

Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023, which introduced new activities and amendments to certain technical eligibility criteria, *Regulation 2021/2139 includes criteria for a significant contribution to two environmental objectives: climate change mitigation (CCM) and climate change adaptation (CCA), and criteria for no significant harm to other environmental objectives (do no significant harm, DNSH).*

Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 (the so-called 'Environmental Delegated Act') is also included in the list. This regulation sets out the TKK for making a significant contribution and not doing serious harm to the other four environmental objectives: water conservation (WTR), circular economy (CE), pollution control (PPC) and biodiversity conservation (BIO).

The Minimum Guarantees (MGs) set out in Article 18 of Regulation 2020/852 are the procedures used to ensure compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Any company subject to the obligations under Regulation 2020/852 is required under Article 8 of the Regulation to disclose three indicators:

- ▶ **Percentage of turnover** derived from products or services related to environmentally sustainable activities;
- ▶ **Percentage of capital expenditure (CapEx)** corresponding to assets or processes related to environmentally sustainable activities;
- ▶ **Percentage of operational expenditure (OpEx)** corresponding to environmentally sustainable assets or processes.

The detailed requirements for the calculation and disclosure of the aforementioned indicators are set out in *Commission Delegated Regulation (EU) 2021/21783*, the so-called "Article 8 Delegated Act".

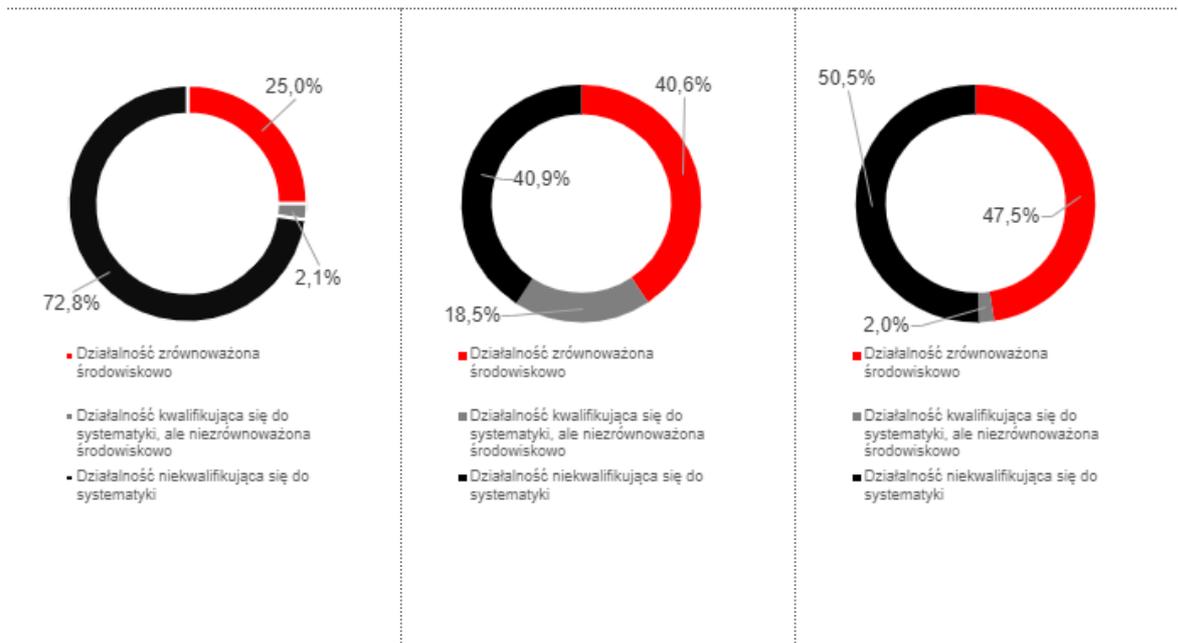
Compliance of the Agora Group's activities with the systematic

The following percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) in line with the Taxonomy was determined as a result of the analyses.

Turnover

CapEx

OpEx



An examination of the compliance of the Agora Group's activities with the systematic showed that:

- The *Agora Group's sustainable operations in 2023 accounted for: 25.0% of turnover, 40.6% of capital expenditure and 47.5% of operating expenditure.*
- Eligible but non-systematic (environmentally unsustainable) activities in 2023 accounted for: 2.1% of turnover, 18.5% of capital expenditure and 2.0% of Group operating expenditure.*
- From non-systematic activities in 2023 came: 72.8% of turnover, 40.9% of capital expenditure and 50.5% of Group operating expenditure.*

	Turnover	CapEx	OpEx
value in 2023 [million PLN]	1 424,3	60,9	438,9
sustainable activities (in line with the system)	356,7	24,7	208,5
unsustainable activity (eligible for the systematics but not in line with them)	30,6	11,3	9,0
neutral activities (not eligible for systematisation)	1 037,1	24,9	221,5

The following section describes the process of testing compliance with the Taxonomy, the accounting principles applied and a detailed discussion of the three performance indicators with tables prepared in accordance with the so-called Article 8 Delegated Act, Commission Delegated Regulation (EU) 2021/2178.

There were no significant changes in the volumes reported for 2023 as part of the disclosure on compliance with the EU Taxonomy compared to the volumes presented in 2022.

Taxonomy compliance testing process

A four-stage process was carried out to test compliance with the systematics:

1. Identification

The stage consisted in reviewing all activities carried out by the Agora Group and its subsidiaries and then determining whether, and if so, which activities qualify for systematisation. The companies' revenues, capital expenditures and operating expenses were reviewed. Their descriptions in the annexes to Commission Delegated Regulation (EU) 2021/2139 and 2023/2486 were used to identify the individual activities, which were compared to the activities actually carried out. Where the description of the activities was not sufficiently clear, the statistical classification of economic activities NACE⁴ was used as a subsidiary.

2. Allocation

The stage consisted of allocating turnover, capital expenditure and operating expenditure to the various activities identified in the first stage. Details of the allocation methods used are described in the *Accounting Principles* chapter.

3. Verification

The phase consisted of two types of survey:

- *For all identified activities, an examination of the criteria for significant contribution and no significant harm was carried out using the TCNs set out in the Annexes to Commission Delegated Regulation (EU) 2021/2139. Details of the assessment are set out in the Verification of compliance with the Technical Eligibility Criteria section.*
- *An assessment of whether the Minimum Guarantees are met has been carried out. Details of the assessment are set out in the Minimum Guarantees section.*

4. Calculation

The stage consisted of using the resulting information from stages two and three to draw up tables containing the required information and preparing this supplementary information, as required by Annexes I and II of Commission Delegated Regulation (EU) 2021/2178.

The process of examining compliance with the EU Taxonomy was carried out with the participation of the ESG manager, the financial controller of the Agora Group, the financial controllers of the individual segments of the Agora Group and with the support of an external consulting firm.

MINIMUM GUARANTEES

In accordance with Article 18 of Regulation 2020/852:

The minimum guarantees referred to in Article 3(c) are the procedures to be followed by the business enterprise to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Bill of Human Rights.

The examination of compliance with the Minimum *Safeguards* was carried out in accordance with the recommendations in the *Final Report on Minimum Safeguards* by Platform On Sustainable Finance. According to the recommendations, non-compliance with the Minimum Safeguards is one of four considerations:

1. Inadequate or non-existent human rights due diligence processes, including labour rights, corruption, taxation and fair competition.
2. *The company has ultimately been held liable or found to be in breach of labour or human rights law in certain types of labour or human rights litigation.*

3. Failure to co-operate with the OECD National Focal Point (hereafter OECD NCP) on a notification accepted by the OECD NCP.
4. The Business and Human Rights Resource Centre (BHRRC) took up the allegation against the company and the company did not respond within three months.

In the Agora Group's verification process, non-compliance with the aforementioned premises was examined as follows:

- *Rationale 1: Verification of the completeness of the due diligence processes was based on internal verification of the existence and operation of the due diligence process elements resulting from the framework of these processes contained in the documents mentioned in the definition of the Minimum Guarantees. The design of the due diligence processes in the definition proposed in Article 3(c) of Regulation (EU) 2020/852 is primarily influenced by the provisions of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Compliance was verified using a compliance assessment tool using the assessment methodology proposed by the Platform on Sustainable Finance: World Benchmark Alliance Core UNGP indicators. As a result of the analysis, it was determined that a complete due diligence process is in place and functioning within the organisation that fulfils the guidelines.*
- *Premise 2: Premise 2 was verified in the process of completing the response to Premise 1 by checking that there were no final convictions against the persons listed in the Premise during the period under review. As a result of the verification, it was found that there was no information qualifying the Group for premise 2.*
- *Rationale 3: A verification of the OECD NCP notification database was carried out and showed that there were no notifications occurring against the Group during the period under review. [<http://mneguidelines.oecd.org/database/>].*
- *Rationale 4: A verification of the Business and Human Rights Resource Centre (BHRRC) reporting database was carried out which showed that there were no reports occurring in relation to the Company/Group during the period under review. [<https://www.business-humanrights.org/en/companies>].*

As a result of the verification process, it has been established that the Agora Group's activities **are carried out in accordance with the Minimum Guarantees.**

VERIFICATION OF COMPLIANCE WITH TECHNICAL QUALIFICATION CRITERIA (TKK)

Verification of compliance with the Technical Eligibility Criteria was carried out for all activities eligible for systematisation and consisted of an analysis of the individual criteria of significant contribution and not causing serious damage, as well as a check of the extent to which the activity complies with the TCKs set out in the provisions of Commission Delegated Regulation (EU) 2021/2139. For activities for which the Criteria for significant contribution were not met, the Criteria for the DNSH principle ("do no serious damage") were not analysed.

The following table presents the activities carried out in the CTK study for CCM activity 6.5 Transport by motorbikes, passenger cars and light commercial vehicles:

Criterion of significant contribution	
Mitigating climate change	In preparation for the Technical Qualification Criteria study, the Agora Group's fleet was separated into two categories. The volumes reported as conforming to the systematic refer to a heading that includes only

	electric and hybrid cars, classified as M1 and operating below the specific emission level indicated in the Technical Calibration Criteria.
Criteria for not causing serious damage	
Adaptation to climate change	For its operations, the Agora Group performed a climate risk analysis in line with the TCFD guideline (Q4 2021). In addition, the conclusions of the climate risk analysis were further developed with an analysis of the resilience of the business model under climate change scenarios (Q1 2023).
Sustainable use and protection of water and marine resources	Not applicable.
Transition to a circular economy	The Agora Group does not operate driveways from categories N2 and N3. Passenger vehicles are subject to ongoing maintenance to keep them in good working order and extend their life.
Pollution prevention and control	For category M road vehicles used by the Agora Group, the tyres meet the external rolling noise requirements in the highest class and comply with the rolling resistance coefficient (which affects the energy efficiency of the vehicle) in the two highest classes set out in Regulation (EU) 2020/740, which can be verified on the basis of the European Register of Energy Labelling Products (EPREL).
Protection and restoration of biodiversity and ecosystems	Not applicable.

Accounting principles

The following rules of thumb were applied to calculate the percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) eligible for and compliant with the systematics.

Turnover

With respect to turnover, the denominator was the Agora Group's consolidated revenues in 2023, excluding revenues related to incidental sales of fixed assets, as disclosed in the consolidated financial statements in Note 22, as well as in Chapter III of Table 9 of the *Agora Group Management Report 2023*. Revenues from activities that qualify for and at the same time comply with the systematics have been assigned to the numerator.

Capital expenditure (CapEx)

With regard to capital expenditure (CapEx), the denominator was capital expenditure. CapEx is included in the consolidated financial statements in Note 3,4,5 to the 2023 Consolidated Financial Statements in the *Agora Group Management Report 2023* in section 2.2. in Table 11. The numerator is assigned that part of CapEx that relates to activities that qualify for and at the same time comply with the systematics.

Operating expenditure (OpEx)

In terms of operating expenses (OpEx), the denominator was all costs used to operate the company's assets on a day-to-day basis and keep them in proper working order. This included costs such as personnel costs for

those responsible for the maintenance and repair of the Group's assets, including costs related to the repair and overhaul of buildings, cinemas, vehicles, equipment, systems and software, costs for cleaning of premises, costs in the area of fire protection, costs for film copies necessary for film production activities and costs for the maintenance and repair of bus shelters of public transport systems. The part of OpEx that relates to activities that qualify for and at the same time comply with the systematics has been assigned to the counter.

Other information

The data used for the calculations came from Agora S.A.'s financial and accounting system and from the financial and accounting systems of the individual subsidiaries comprising the Group. The Group avoided double counting when allocating turnover and capital expenditure by making appropriate consolidation exclusions in accordance with the applicable accounting regulations. In the case of operating expenses, which are defined in the Commission Delegated Regulation (EU) 2021/2178 in a manner that does not refer to international financial reporting standards, all accounts in the Group's accounting system were reviewed and the identified items meeting the definition of OpEx were then assigned in each case to a particular activity eligible for systematisation or to a set of other operating expenses (not eligible for systematisation).

The Group discloses in this report for the second time the share of activities that comply with the systematics and for the second time the share of activities that qualify for the systematics. The disclosure in this report relates to the most recent financial year, i.e. the period 01.01.2023-31.12.2023.

No activities contributing to more than one environmental objective were identified during the analysis. There was therefore no need for special procedures to avoid double counting.

Verification of compliance with the Technical Qualification Criteria (TKK) was conducted for all activities eligible for systematics and consisted of an analysis of the individual criteria of material contribution and not causing serious harm. For other activities, not exceeding the materiality threshold, the analysis was not conducted and this type of activity was included as eligible but not in compliance with the systematics.

The analysis showed that there was no need for a detailed disaggregation of the key performance indicators between the Group's operating units in accordance with paragraph 1.2.2.3. of Annex I of the *Commission Delegated Regulation (EU) 2021/2178*. For more information, please refer to the comments on the individual key performance indicators.

Turnover

Table: Percentage of turnover in line with systematics

Financial year 2023	Year			Criteria for significant contribution							Criteria for the DNSH principle ("do no serious harm")							Minimum <small>minimum</small>	Percentage of systematically compliant turnover, year 2022	Category (supporting activities or)	Category (transition activity)
	Code or codes	Turnover (absolute value)	Part of turnover	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems						
Business activities		PLN million	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T		
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																					
A.1. Types of environmentally sustainable activities (consistent with the systematics)																					
Infrastructure supporting low-emission road transport and public transport	CCM 6.15	6,1	0,4%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	0,4%	E			
Broadcasting of free-to-air and subscription programmes	CCA 8.3	51,5	3,6%	N/EL	T	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	4,2%		T		
Creative, cultural and entertainment activities	CCA 13.1	7,9	0,6%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	0,4%	E			
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	291,2	20,4%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	21,2%	E			
Turnover from environmentally sustainable activities (in accordance with the system) (A.1)		356,7	25,0%	0,4%	24,6%	0,0%	0,0%	0,0%	0,0%								26,6%				
Including supporting				0,4%	21,0%	0,0%	0,0%	0,0%	0,0%									E			
Including in favour of the transition				0,0%															T		
A.2. Activities eligible for systematics but not environmentally sustainable (activities not in accordance with systematics)																					
Acquisition and ownership of buildings	CCM 7.7 /	24,7	1,7%	T	N	N/EL	N/EL	N/EL	N/EL								0,4%				

	CCA 7.7																		
Data processing; website management (hosting) and related activities	CCM 8.1 / CCA 8.1	4,3	0,3%	T	N	N/EL	N/EL	N/EL	N/EL									0,4%	
Sale of second-hand goods	CE 5.4	1,6	0,1%	N/EL	N/EL	N/EL	T	N/EL	N/EL									0,0%	
Turnover from activities eligible for the systematics but not environmentally sustainable (not in accordance with the systematics) (A.2)		30,6	2,1%	2,0%	0,0%	0,0%	0,1%	0,0%	0,0%									27,0%	
Total (A.1.+A.2.)		387,2	27,2%	2,5%	24,6%	0,0%	0,1%	0,0%	0,0%									53,6%	
B. NON-SYSTEMATIC ACTIVITIES																			
Turnover from non-systematically eligible activities (B)		1 037,1	72,8%																
Total (A+B)		1 424,3																	

Agora Group achieved in 2023. PLN 1,424.3 million in revenue. The vast majority of it (PLN 1,037.1 million) related to activities that do not qualify for systematisation. The remainder of the revenue represented turnover qualifying for systematisation, including (the activities are listed in order of having the largest share in the company's turnover):

-Turnover related to CCA 13.3 Activities related to the production of films, videos, television programmes, sound recordings and music amounted to PLN 291.2 million (20.4% of the total turnover). Revenues from the group's activities related to the production and co-production of films and the production of video recordings and podcasts were classified to this activity, accounting for one fifth of the Agora Group's turnover in 2023. Revenues from ticket sales in Helios cinemas were also classified in this activity.

-Turnover related to CCA activity 8.3 Broadcasting of public and subscription programmes amounted to PLN 51.5 million (3.6% of total turnover)

Turnover related to CCA activity 13.1 Creative, arts and entertainment activities amounted to PLN 7.9 million (0.6% of total turnover)

-Turnover related to CCM activity 6.15 Infrastructure supporting low emission road transport and public transport amounted to PLN 6.1 million (0.4% of total turnover)

For all other activities, it was confirmed that the relevant criteria of making a significant contribution to climate change mitigation and the criteria of not doing serious harm to other environmental objectives were met, and therefore the turnover associated with these activities was considered to be in line with the systematics.

The share of turnover from environmentally sustainable activities (in line with the systematics) in total turnover was 2023. 25.0% and the share of turnover from activities eligible for systematics but not in line with systematics was 2.1%. In total, the share of turnover from activities eligible for systematics was 27.1%. The remaining 72.9% of

turnover is attributable to revenue from activities that do not qualify for systematics, i.e. those for which the regulator has not established Technical Eligibility Criteria in the annexes to the delegated acts.

► Capital expenditure (CapEx)

Table: Percentage of capital expenditure (CapEx) in line with the systematic

Financial year 2023	Year		Criteria for significant contribution							Criteria for the DNSH principle ("do no serious harm")							Percentage of system-compliant capital expenditure, year 2022	Category (supporting activities or)	Category (transition activity)
	Code or codes	Capital expenditure in absolute terms	Percentage of capital expenditure	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems	Minimum guarantees			
Business activities	PLN million	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																			
A.1. Types of environmentally sustainable activities (consistent with the systematics)																			
Road freight transport services	CCM 6.6 / CCA 6.6	0,6	0,9%	T	N	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	0,0%		T
Infrastructure supporting low-emission road transport and public transport	CCM 6.15	5,7	9,3%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	10,6%	E	
Installation, maintenance and repair of instruments and equipment for measuring, regulating and controlling the energy performance of a building	CCM 7.5	1,1	1,9%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	0,0%	E	
Installation, maintenance and repair of renewable	CCM 7.6	0,1	0,1%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	0,9%	E	

energy technology systems																			
Computer programming, consultancy and related activities	CCA 8.2	6,5	10,7%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T	T	T	T	T	T	9,8%			
Broadcasting of free-to-air and subscription programmes	CCA 8.3	10,0	16,4%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T	T	T	T	T	T	7,6%			T
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	0,8	1,3%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T	T	T	T	T	T	2,3%		E	
Investment expenditures for environmentally sustainable activities (consistent with the system) (A.1)		24,7	40,6%	12,2%	28,4%	0,0%	0,0%	0,0%	0,0%							42,1%			
Including supporting				11,3%	1,3%	0,0%	0,0%	0,0%	0,0%									E	
Including in favour of the transition				0,9%															T
A.2. Activities eligible for systematics but not environmentally sustainable (activities not in accordance with systematics)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0,2	0,3%	T	N/EL	N/EL	N/EL	N/EL	N/EL										0,1%
Renovation of existing buildings	CCM 7.2 / CCA 7.2 / CE 3.2	7,1	11,7%	T	N	N/EL	N	N/EL	N/EL										13,1%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0,2	0,3%	T	N/EL	N/EL	N/EL	N/EL	N/EL										2,2%

Data processing; website management (hosting) and related activities	CCM 8.1 / CCA 8.1	3,8	6,2%	T	N	N/EL	N/EL	N/EL	N/EL									10,8%	
Investment expenditures for activities that qualify for systematics but are environmentally unsustainable (not in accordance with systematics) (A.2)		11,3	18,5%	18,5%	0,0%	0,0%	0,0%	0,0%	0,0%									15,4%	
Total (A.1.+A.2.)		36,0	59,1%	30,7%	28,4%	0,0%	0,0%	0,0%	0,0%									57,5%	
B. NON-SYSTEMATIC ACTIVITIES																			
Capital expenditure for non-systematic activities (B)		24,9	40,9%																
Total (A+B)		60,9																	

In 2023, the Agora Group realised capital expenditure of PLN 60.9 million. The vast majority of these were in activities that qualify for the systematics, including (activities are listed in order of having the largest share of capital expenditure):

- Capital expenditures related to CCA activity 8.3 Broadcasting of public and subscription programmes amounted to PLN 10.0 million (16.4% of total capital expenditures)
- Capital expenditures related to CCA activity 8.2 Computer programming, consultancy and related activities amounted to PLN 6.5 million (10.7% of total capital expenditures)
- Investments related to CCM activity 6.15 Infrastructure supporting low emission road transport and public transport amounted to PLN 5.7 million (9.3% of total investment)
- Capital expenditure related to CCM activity 7.5 Installation, maintenance and repair of instruments and equipment for measurement, regulation and control of building energy performance amounted to PLN 1.1 million (1.9% of total capital expenditure)
- Capital expenditures related to CCA activity 13.3 Motion picture, video, television programme, sound and music production activities amounted to PLN 0.8 million (1.3% of total capital expenditures)
- Capital expenditures related to the activities of CCM 6.6 / CCA 6.6 Road freight transport services amounted to PLN 0.6 million (0.9% of total capital expenditures)
- Capital expenditures related to CCM activity 7.6 Installation, maintenance and repair of renewable energy technology systems amounted to PLN 0.1 million (0.1% of total capital expenditures)

For all other activities, it was confirmed that the relevant criteria for making a significant contribution to climate change mitigation and the criteria for not doing serious harm to other environmental objectives were met, and therefore the capital expenditure associated with these activities was considered to be in line with the systematics.

In addition, the Agora Group realised capital expenditures of PLN 24.9 million (40.9% of total capital expenditures) related to activities not classified as systematic.

The share of capital expenditures related to environmentally sustainable activities (compliant with the systematics) in total capital expenditures was in 2023. 40.6%, and the share of capital expenditures related to activities eligible for but not in line with the systematics was 18.5%. In total, the share of capital expenditure related to activities eligible for systematics was 59.1%. The remaining 40.9% of capital expenditure was attributable to activities not eligible for systematics, i.e. those for which the regulator did not set Technical Eligibility Criteria in the annexes to the delegated act.

► **Operating expenditure (OpEx)**

Table: Percentage of Operational Expenditure (OpEx) in line with the systematic

Financial year 2023	Year			Criteria for significant contribution											Criteria for the DNSH principle ("do no serious harm")					Percentage of operating expenditure in line with the systematic, year 2022	Category (supporting activities or)	Category (transition activity)
	Code or codes	Operating expenditure in absolute terms	Percentage of operating expenditure	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems	Mitigating climate change	Adaptation to climate change	Water and marine resources	Closed loop economy	Pollution	Biodiversity and ecosystems	Minimum						
Business activities	PLN million	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T			
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																						
A.1. Types of environmentally sustainable activities (consistent with the systematics)																						
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	1,3	0,3%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	0,1%					
Infrastructure supporting low-carbon road transport and public transport	CCM 6.15	13,8	3,2%	T	N/EL	N/EL	N/EL	N/EL	N/EL		T	T	T	T	T	T	3,2%	E				
Computer programming, consultancy and related activities	CCA 8.2	0,5	0,1%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	0,5%					

Broadcasting of free-to-air and subscription programmes	CCA 8.3	26,8	6,1%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	1,5%		T
Creative, cultural and entertainment activities	CCA 13.1	12,8	2,9%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	2,2%	E	
Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	153,2	34,9%	N/EL	T	N/EL	N/EL	N/EL	N/EL	T		T	T	T	T	T	33,5%	E	
Operating expenditure for environmentally sustainable activities (consistent with the system) (A.1)		208,5	47,5%	3,5%	44,0%	0,0%	0,0%	0,0%	0,0%								42,2%		
Including supporting				3,2%	37,8%	0,0%	0,0%	0,0%	0,0%									E	
Including in favour of the transition				0,0%															T
A.2. Activities eligible for systematics but not environmentally sustainable (activities not in accordance with systematics)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0,1	0,0%	T	N/EL	N/EL	N/EL	N/EL	N/EL								0,1%		
Road freight transport services	CCM 6.6 / CCA 6.6	0,1	0,0%	T	N	N/EL	N/EL	N/EL	N/EL								0,0%		
Renovation of existing buildings	CCM 7.2 / CCA 7.2 / CE 3.2	2,7	0,6%	N	T	N/EL	N	N/EL	N/EL								0,0%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0,0	0,0%	T	N/EL	N/EL	N/EL	N/EL	N/EL								0,0%		
Data processing; website management (hosting) and related activities	CCM 8.1 / CCA 8.1	5,0	1,1%	T	N	N/EL	N/EL	N/EL	N/EL								1,3%		
Sale of second-hand goods	CE 5.4	1,1	0,2%	N/EL	N/EL	N/EL	T	N/EL	N/EL								0,0%		

The share of capital expenditures related to environmentally sustainable activities (compliant with the systematics) in total capital expenditures was in 2023. 40.6%, and the share of capital expenditures related to activities eligible for but not in line with the systematics was 18.5%. In total, the share of capital expenditure related to activities eligible for systematics was 59.1%. The remaining 40.9% of capital expenditure was attributable to activities not eligible for systematics, i.e. those for which the regulator did not set Technical Eligibility Criteria in the annexes to the delegated act.

III. INFORMATION ON SOCIAL ISSUES

S1 OWN WORKFORCE

SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

Agora Group employees represent diversity in terms of skills, talents, viewpoints and life and work experiences. Gender equality and the promotion of diversity are an integral part of team management at Agora, where the workplace is adapted for everyone, regardless of physical or mental fitness.

The company makes every effort to counter discrimination in all areas of employment, including the establishment and termination of employment relationships, terms and conditions of employment, promotion and access to training. Agora also engages in dialogue with employees through a variety of internal communication channels and organises meetings to discuss the company's performance and strategies.

In implementing the ***Agora Group ESG Strategy for 2023-2027***, the company takes into account the voice of employees by creating working teams to address different issues such as the environment, society or corporate governance. Employees are a key stakeholder group influenced by the company.

Employees also have the opportunity to raise questions, ideas and suggestions for ongoing activities, as well as to initiate social projects within the company's operations.

In addition, Agora has a compliance system in place that allows all employees and colleagues to report both violations and suggestions to improve the organisation. All these activities are aimed at building trust and commitment among employees and creating an atmosphere of openness and cooperation in the workplace.

The objectives and methods for communicating with employees and colleagues and the whistleblowing processes are detailed within the **ESRS disclosure SBM-2 Stakeholder interests and views** and **ESRS G1-1 Corporate Culture and Business Policies**.

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The Group's actions influencing its own employees are implemented in terms of ensuring appropriate employment standards, including ensuring adequate wages and closing the wage gap. At the same time, the organisation shapes the impact in terms of equality and diversity through the application of documents such as the *Code of Ethics* and the *Diversity Policy*. Additionally, it creates learning opportunities for its team members and provides access to knowledge development and various forms of training.

In order to manage the material impacts on its own employees, as well as the associated material risks and material opportunities, Agora's Board of Directors, when setting its strategy, set out a plan to create a unified matrix management structure within the Group for its strategic areas of operation, including HR, and set the objective of systematising and developing the compliance system across the organisation. These measures aim to make effective use of the team's competencies, manage significant impacts, risks and opportunities, and prevent irregularities.

The process for identifying and assessing material impacts, risks and opportunities in terms of business practices was conducted during the materiality study. It is detailed in the disclosure requirement **IRO-1** and **IRO-2**.

Given the local nature and profile of the business, no risks related to child labour, forced labour, human trafficking or other human rights violations have been diagnosed at any of Agora's companies. Agora

demonstrates due diligence on this topic, in line with the *UN Guiding Principles on Business and Human Rights* and *the Declaration of the International Labour Organisation*.

S1-1 POLICIES RELATED TO OWN WORKFORCE

The terms and conditions of employment, work and pay in the Agora Group are defined by internal regulations, including in particular the Work Regulations, the Employee Remuneration Regulations and individual employment contracts.

The work regulations are an internal document in force in each Agora Group company meeting certain legal requirements. It regulates the organisation and order of work within the employment relationship and the related rights and obligations of the employer and employees. The regulations apply to everyone, regardless of their position, type of contract or working hours.

The Staff Remuneration Regulations and their appendices set out the general terms and conditions of remuneration for all employees, regardless of the type of contract and position held. The regulations also contain special regulations dedicated to certain positions. The Regulations are an internal document in force in each company of the Agora Group as an independent document.

The remuneration policy for key managers of the Agora Group is a document aimed at creating attractive working conditions so as to attract and retain qualified employees who are key to the implementation of the Company's strategy and its long-term development. Agora ensures that the remuneration system for key employees is aligned with market conditions and the company's financial situation, and at the same time competitive.

The Remuneration Policy for Members of the Management and Supervisory Boards of Agora S.A. is a document that contains the basic principles for the remuneration of members of Agora S.A.'s collegiate bodies, [described as part of disclosure **GOV-3 Considering sustainability-related performance in incentive schemes**].

In addition, the **Agora Group's Diversity Policy** has been adopted to counteract all forms of discrimination within the organisation. It is based on breaking down barriers such as age, gender or health status. Employees and associates of the Agora Group are people from different backgrounds and cultures, displaying different skills and talents, representing different points of view and having different life and work experiences. A diverse team is a driver of creativity, innovation and ingenuity. This is why we value diversity within the organisation so much. The document is in the process of being updated and will be published in 2024, in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises¹¹.

Since 2016. The Agora Group is a signatory to the Diversity Charter and is thus one of the employers across Europe working to promote and spread diversity in the workplace.

¹¹ ILO Declaration on Fundamental Principles and Rights at Work, 1998, source: www.ilo.org/public/english/standards/declaration/declaration_polish.pdf

S1-2 PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

Agora's procedures for working with its own employees and employee representatives on influencers address how the company manages important sustainability topics, including data security and copyright issues.

Intellectual property (copyright)

As a media company, Agora aims to protect rights relating to intellectual property, in particular copyright. Such protection covers, inter alia, press texts, original literary and artistic works (including musical works) as well as advertising and multimedia creations (including photography and film production) created within the organisation. In each area of the Agora Group's operations, a specific person responsible for this issue has been designated.

Dedicated units keep registers of contracts or model contracts relating to copyright, especially journalistic texts, books, photographs or musical works. Each of the documents contains a clause specifying the fields of exploitation of both content and photographs, as well as the time during which Agora has the right to use them.

Data protection

Agora Group companies also have a number of procedures and processes in place to ensure compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation; RODO), in particular concerning the principles of processing and protection of personal data.

In addition, the Agora Group has procedures in place relating to the security of data processed on equipment used by employees and collaborators.

In the Agora Group, training courses on personal data protection are conducted, in particular on the following thematic areas: organisation of personal data protection in companies, verification of suppliers, risk analysis, handling of requests, data retention, as well as comprehensive dedicated training on personal data protection violations. Awareness-raising activities for employees on personal data protection are also carried out, including breach notification, supplier verification, paper data protection, offboarding, the essence of RODO training or data transfers.

Supervision of all data protection issues, in particular compliance with the provisions of the RODO and internal regulations, is carried out by Data Protection Officers appointed within specific Group companies.

Media Ethics

Given the scope of Agora's activities and its long-standing traditions, journalistic ethics and media ethics are of particular importance to Agora. Freedom of speech, independence, and credibility are the principles which have guided Agora's editorial teams for years in their daily work. All content produced by Agora's media is based on reliable and truthful reporting. Reliable sources and transparency are important.

This area is governed by the Agora Group's internal codes, which primarily concern the journalistic profession, including the Agora Charter, which sets the guidelines and rules for the work of journalists and publishers employed in the Agora Group's media. In addition, Agora S.A. has also implemented internal regulations on the publication of advertisements and announcements.

External industry codes

The Agora Group also complies with industry self-regulations related to media and advertising activities. In particular, these include:

- ▶ **The Media Ethics Charter**, a document containing the basic principles of journalistic ethics. As a leading media concern in Poland, we are aware of our responsibility and of the impact and influence we have on our surroundings, as well as of the role of the media in human life and civil society, which is why we are guided on a daily basis by the principles set out in the Charter.
- ▶ **The Code of Good Practice for Newspaper Publishers**, a set of standards in the form of an internal act of self-control for the community of publishers affiliated to the Chamber of Press Publishers, as well as other publishers who will join it in the coming years.
- ▶ **The Code of Ethics for Advertising**, which is the generally applicable standard for marketing communications in Poland. It constitutes a set of principles to be followed by entrepreneurs, especially advertisers and other legal persons, natural persons and organisational units without legal personality, engaged in advertising activities.

The Agora Group makes every effort to ensure that the above principles are implemented in accordance with the expectations of its stakeholders. It ensures that advertisements broadcast by the Group's media comply with the applicable law and good morals. In addition, advertisements for high-risk or questionable products or industries are subject to legal review.

S1-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

Agora has a whistleblowing system in place. It allows people to report all types of irregularities, including those related to bullying, discrimination, fraud and abuse of power. Reporting can be done in a face-to-face meeting, by telephone, by email or through a form on the website. Reports can be made anonymously. All reports are recognised fairly on a transparent basis.

The processes for nullifying negative influences and the channels for the unit's employees to raise concerns are detailed within Requirement G1-1 Corporate Culture and Conduct Policies.

S1-4 TAKING ACTION ON MATERIAL IMPACTS AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS AND APPROACHES

Agora's overriding value is the respect of human rights, which includes ensuring decent work and countering all forms of discrimination, mobbing and violation of personal rights. In order to realise these values, Agora conducts training and workshops aimed at shaping attitudes in line with the Group's principles and rules, providing information on document updates and consolidating knowledge of procedures.

Agora's e-learning platform includes training on the Code of Ethics, which is mandatory for all employees and co-workers, as well as managers. In addition, Agora invests in development programmes, supporting the improvement of professional competences by subsidising studies, language courses or coaching sessions.

Agora is also updating *the Agora Group Diversity Policy*, creating a comprehensive diversity management strategy, and is working on a new version of the *Anti-Discrimination and Anti-Bullying Policy*. Development interviews are also being conducted, allowing employees to discuss their activities individually and tailor training and development programmes to their needs.

In 2023, Agora conducted an employee satisfaction survey using the NPS (Net Promoter Score) methodology. The conclusions of the survey were analysed and used to develop strategic actions in the employee area for 2024.

S1-5 TARGETS RELATED TO MANAGING MATERIAL IMPACTS, ADVANCING POSITIVE IMPACTS, AS WELL AS TO RISKS AND OPPORTUNITIES

In connection with the change in the organisational structure of the Agora Group as of 1 April 2024 and the implementation of the strategic goals set by the Agora Management Board, a key objective in the personnel area is to systematise and develop personnel activities across the organisation. In this context, the following activities are planned:

1 Develop a new HR strategy aligned with the changing organisational and business reality of the Agora Group. The new strategy will address current HR management challenges and needs and support the achievement of business objectives.

2 Conduct a NPS (Net Promoter Score) survey for the entire Agora Group to assess employee satisfaction and identify areas for improvement. The results of the survey will be used to further improve the employee experience.

3 Implement a plan to reduce the pay gap in the Agora Group, including measures to reduce the pay gap between employees of different genders, ages or positions.

4 Develop a diversity strategy for the Agora Group, including updating the *Agora Group Diversity Policy*. This policy will focus on promoting diversity and equality in the workplace, ensuring that appropriate measures and procedures are in place for all employees, regardless of gender, age, background or sexual orientation.

S1-6 CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

The Agora Group operates in Poland and its employees are primarily Polish nationals.

The tables in the following section present a summary of basic information on the Group's employees as at the end of 2023. In order to align the data with the layout required by ESRS standards, certain categories of data are not comparable year-on-year. The figures presented within the S1-6 disclosure collected relate to the number of people. Information on the number of FTEs is provided in the comments to the tables.

Table 4.1 Employment structure in the Agora Group

Employment	Number of employees		
	2022	2023	y/y change
Poland	2449	2760	+12,7%

The data comes from the employee departments of the Agora Group

FTE employment in the Agora Group at the end of December 2023 was 2,581 FTEs, an increase of 242 FTEs compared to December 2022.

The increase was mainly due to the inclusion in the Agora Group figures of the number of employees in the Eurozet Group, which in December 2023 comprised 364 FTEs.

Table 4.2 Employment structure in the Agora Group by gender

Gender	Number of employees		
	2022	2023	change
Period			

Women	1 378	1 560	+13,2%
Men	1 071	1 202	+12,2%
Others	0	0	-
Not disclosed	0	0	-
In total, employees	2449	2 762	+12,7%

The data comes from the employee departments of the Agora Group

Table 4.3: Employment structure at Agora S.A.

Employment	Number of employees		
Period	2022	2023	% change
Poland	1426	1 351	-5,3%

The data comes from Agora S.A.'s employee department.

Table 4.4 Employment structure in Agora S.A. by gender

Gender	Number of employees		
Period	2022	2023	% change
Women	817	767	-6,1%
Men	609	584	-4,1%
Others	0	0	-
Not disclosed	0	0	-
In total, employees	1426	1 351	-5,3%

The data comes from Agora S.A.'s employee department.

Apart from full-time employees, the employment structure in the non-financial report also includes employees on long-term absences (unpaid leave, parental leave, rehabilitation allowance, etc.), totalling 179. Hence the discrepancy between the data provided in this report and the financial statements, according to which the Agora Group's employment structure as at the end of the year amounted to 2,581 FTE.

The -5.3% year-on-year decrease in headcount is the result of the restructuring carried out in the Digital and Printed Press segment in Q4 2022.

S1-7 CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

Due to the specific nature of the industry, Agora S.A. and its Group companies cooperate with representatives of liberal professions (journalists, photojournalists) who provide their services to a number of employers or with people who are just entering the job market, taking on tasks on a limited time basis at flexible dates matching other commitments. This is particularly evident in the Helios cinema chain, which often employs people who reconcile work with higher education. In this way, it provides them with the opportunity to enter the market and gain work experience without having to give up further education.

The following tables present information on civil law, B2B and outsourcing contracts in the Agora Group and the parent company Agora S.A. in 2023.

Table 4.5 Characteristics of non-employees constituting own employees of the Agora Group

2023	Agora Group			
	Women	Men	Others	Not disclosed
Data on non-employees working with the unit				
Number of persons cooperating on the basis of civil law contracts (orders, works, management contract)	1 587	1 291	0	0
Number of persons cooperating on the basis of a cooperation agreement (B2B)			377*	0
Number of people on external contracts	0	2	0	0

The data comes from the employee departments of the Agora Group

*In the table above, under the heading of Number of persons cooperating on a business-to-business (B2B) basis, due to the availability of information to consolidate the data for this report, the number of persons indicated for 2023 has been assigned to the "Others" category.

Table 4.6 Characteristics of non-employees constituting Agora S.A.'s own employees.

2023	Agora SA			
	Women	Men	Others	Not disclosed
Data on non-employees working with the unit				
Number of persons cooperating on the basis of civil law contracts (orders, works, management contract)	343	375	0	0
Number of persons cooperating on the basis of a cooperation agreement (B2B)	0	0	138*	0
Number of people on external contracts	0	0	0	0

The data comes from Agora S.A.'s employee department.

*In the table above, under the heading of Number of persons cooperating on a business-to-business (B2B) basis, due to the availability of information to consolidate the data for this report, the number of persons indicated for 2023 has been assigned to the "Others" category.

S1-8 SCOPE OF COLLECTIVE BARGAINING AND SOCIAL DIALOGUE

Agora has institutions representing employees: an employee **council** and **trade unions** and an **employee representative**. These entities are invited to discuss key employee issues with the Company's Management Board, which discusses with their representatives proposed solutions affecting employee rights, such as amendments to work regulations, write-offs to the Company's Social Benefits Fund or restructuring processes, including group lay-offs. In addition, the trade unions operating within the organisation, at the invitation of the Company's Management Board, take an active part in shaping the employee situation at Agora, creating and presenting their own solutions.

The Company's Management Board meets with employees and associates of the Agora Group several times a year. The occasion for such events is provided, among others, by the publication of the quarterly results of the Agora Group and Agora S.A. During meetings with the team, the Management Board answers questions, solves ad hoc problems and adopts conclusions, which are later discussed in the relevant units of the organisation.

As required by law, the boards of companies within which trade unions operate consult or, as appropriate, agree on legally defined decisions with trade union representatives. In other companies, as required by law, there is the institution of an employee representative.

There are three trade unions in the Agora Group - the Inter-Union Trade Union Solidarność, covering Agora S.A., Inforadio Sp. z o.o., Agora Radio Group Sp. z o.o., Hellios S.A., AMS S.A. and Goldenline Sp. z o.o., the

Company Commission Inicjatywa Pracownicza, covering Agora, and the Trade Union Committee for the Defence of Gazeta Wyborcza, also at Agora.

The employees' council operates on the basis of the *Act on Informing and Consulting Employees and an agreement between the council and the company's Board of Directors*. Elections to the council are universal and the term of office of the council is 4 years. The employees' council represents the interests of the employees and is the formal link between the employees and the Management Board; it acts as an advisory and consultative body. The employees' council functions in the companies: Agora S.A., AMS S.A., AMS Serwis Sp. z o.o. and Grupa Radiowa Agory Sp. z o.o.

The proportion of all employees covered by collective bargaining agreements is 0%. There is no such agreement in any of the Agora Group companies.

The entity has not entered into agreements with its employees for representation by a European works council, the works council of a European public limited company or the works council of a European cooperative.

S1-9 DIVERSITY METRICS

The following summaries present detailed information on employment. In the Agora Group and in the parent company Agora S.A., due to a change in the age ranges relative to the layout of the data reported for 2022, the data for the reporting year are not comparable (the age ranges are indicated within the disclosure requirement **S1-9 Diversity metrics**).

Table 4.7 Diversity metrics in the Agora Group.

2023				
Agora Group				
Total employees on employment contracts	Women	Men	Others	Not disclosed
Total number of employees, including:				
Age group: over 50	1 560	1 202	0	0
Age group: 30-50 years	304	330	0	0
Age group: under 30	1 025	725	0	0
	231	147	0	0

The data comes from the employee departments of the Agora Group

Table 4.8: Diversity metrics at Agora S.A.

2023				
Agora SA				
Total employees on employment contracts	Women	Men	Others	Not disclosed
Total number of employees, including:				
Age group: over 50	767	584	0	0
Age group: 30-50 years	491	346	0	0
Age group: under 30	163	181	0	0
	113	57	0	0

The data comes from Agora S.A.'s employee department.

Glass Ceiling Ratio

The *Glass Ceiling Ratio* (GCR) is an indicator showing the equality of promotion opportunities for each gender in an organisation, calculated separately for each level of the organisational hierarchy. The data in the table below indicate by how much more difficult it was for women to be promoted to the 'senior management' group and to the 'middle management' group. The indicator is reported at Agora Group-wide level

In 2023, there was a significant decrease in the index for senior managers (18% year-on-year change - a change of more than 2 pp), which is a positive sign indicating a levelling of opportunities for promotion and development. There was a 33% year-on-year increase in the score for managers and executives. The level of GCR1 was relatively low in the base year and the year-on-year change alone is 0.87 pp.

Table 4.9. Glass Ceiling Ratio in 2023

Agora Group	2022	2023	Y/Y change
GCR2 (senior management)	14,90%	12,19%	-18%
GCR1 (managers and supervisors)	2,60%	3,47%	33%

The data comes from the employee departments of the Agora Group

S1-10 ADEQUATE WAGES

All contracted employees of the Group are paid adequate salaries in accordance with the applicable benchmarks set out in the ESRS standards¹².

S1-11 SOCIAL PROTECTION

Employees of the Agora Group are covered by social protection both through public programmes and through benefits from the Company Social Benefit Funds. These can be granted to employees and to pensioners - former employees, employed immediately prior to their retirement or pension. The organisation also operates a Loan and Benefit Fund.

Benefits from the Social Benefit Funds in Agora's companies variously protect against loss of income caused by a major life event, such as, but not limited to:

- Accident at work and acquired disability (health benefits);
- parental leave (childbirth allowances);
- retirement (pensioner funding)

The Social Benefit Funds are also used for:

- financial assistance in obtaining and using housing or residential buildings;
- material assistance - in kind or financial;
- supporting leisure;
- sporting and recreational activities;
- cultural and educational activities.

In addition, Agora provides its employees with non-wage benefits such as co-financing of employee benefits from health, sports, cultural or product offers, among others.

¹² set out in paragraph AR 73 of Delegated Regulation 2023/2772 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards.

S1-12 PERSONS WITH DISABILITIES

Agora wants each and every one of its employees and co-workers to be able to participate fully in professional and social life. That is why it makes every effort to ensure that the workplace it creates is suitable for everyone, including people with physical or mental disabilities.

The following tables present information on the share of people with disabilities employed on a contractual basis in the Agora Group, including Agora S.A.

Table 4.10: Percentage of employees with a disability certificate in the Agora Group

	Agora Group
Period	2023
Percentage of employees with disabilities	3,33%

The data comes from the employee departments of the Agora Group

Table 4.11: Percentage of employees with a disability certificate at Agora S.A.

	Agora SA
Period	2023
Percentage of employees with disabilities	1,11%

The data comes from Agora S.A.'s employee department.

It is important to take into account that more than 1/3 of AMS's male and female employees are people with disabilities and that the company has been committed for years to promoting equality and respect in the workplace. As an employer, AMS supports the Foundation's activities financially and in kind. It also facilitates social activities for its male and female employees through flexible working hours and additional days off. In 2023, AMS was awarded in the 13th edition of the "Employer Worth Trusting" competition in the category of Company Friendly to People with Disabilities. The chapter recognised AMS for creating a truly inclusive workplace, where respect for the other person, regardless of limitations, is a core value of the company.

S1-13 TRAINING AND SKILLS DEVELOPMENT METRICS

Employees are a key asset of the Agora Group. They have the opportunity to participate in a wide range of training and development programmes, including on-site and online training as well as participation in webinars and access to e-learning platforms.

Agora S.A. has in place a *Training Policy for Agora S.A.*, which covers the scope and principles of activities related to professional development of employees and promotion of competence development within the organisation. The improvement of qualifications applies primarily to employees hired on the basis of an employment contract (especially in the case of employer's participation in the costs of studies or courses), however, those who cooperate with Agora on the basis of other forms (contract of mandate, contract for specific work, b2b) may also participate in trainings, e.g. internal trainings or industry conferences.

Types of training provided at Agora

Induction training for new employees (*Welcome to Agora*) - the programme includes basic information about the company (history, values, organisational culture), personal data protection, IT security procedures and initial health and safety training for contracted employees. The training also includes a separate section on corporate social responsibility and ESG management at Agora Group. The induction training is intended for all new people in the company - whether full-time employees, associates or interns. The rest of the onboarding is provided in the form of e-learning.

- ▶ **Management training** - workshops aimed at managers to develop their people management skills - internal and external, designed for both full-time employees and colleagues as required.
- ▶ **Training and developing personal skills and competencies** - designed for both full-time employees and colleagues depending on the needs of the department.
- ▶ **Sales training** - workshops to improve specific sales skills. Sales training programmes are always developed on the basis of sound needs analyses, including both business data analysis. and observations and interviews during customer visits and sales team meetings. The results of the analyses determine the direction of the individual sales groups. Training work is based on case studies built on the basis of real professional situations of the participants.
- ▶ **Substantive training** - intended for both full-time staff and colleagues depending on the needs of the department, closely related to the knowledge and skills needed for particular jobs.
- ▶ **Language training** - funding is for contracted employees.
- ▶ **Study** - funding is for contracted employees.

In addition to training programmes, internal coaching for selected employees of the company has been used at Agora Group since 2017 as part of its development activities. The coaches are internal coaches from the HR department, people educated and certified by international organisations (ICC - International Coaching Community). Development talks are also held once a year. This is an opportunity for employees and their superiors to discuss and summarise the goals achieved in the last 12 months and to jointly set new ones that the employee will pursue as part of his or her career path development.

It should be noted that Agora does not conduct development interviews with its colleagues, while development interviews are not conducted at Eurozet Group companies.

In the summaries presented below, exclusions have been applied to some e-learning training courses conducted in 2023 where detailed statistics on employee participation were not kept. The data may not include complete data on training provided externally to the company. Not all Group companies keep full records of such information.

Due to changes in the data collection and presentation structure resulting from the adaptation to ESRS reporting, the 2023 data are not comparable to the 2022 data.

Table: Average number of training hours in the Agora Group

2023				
Agora Group				
Average number of training hours per employee	Women	Men	Others	Not disclosed
Senior management	112,05	41,07	-	-
Managers and supervisors	69,39	77,97	-	-
Other employees	50,11	129,00	-	-
Total	58,53	106,15	-	-
Regular staff appraisals - percentage of appraisals that have taken place vs. planned interviews				
Senior management	42%	47%	0	0
Managers and supervisors	85%	86%	0	0
Other employees	80%	72%	0	0
Total	81%	76%	0	0
Regular employee appraisals - average number of appraisals conducted per employee				
Senior management	0,16	0,30	0	0
Managers and supervisors	0,85	1,29	0	0
Other employees	0,52	0,49	0	0
Total	0,57	0,69	0	0

The data comes from the employee departments of the Agora Group

Table 4.12: Average number of training hours at Agora S.A.

2023				
Agora S.A.				
Average number of training hours per employee	Women	Men	Others	Not disclosed
Senior management	34,88	32,19	-	-
Managers and supervisors	17,51	10,67	-	-
Other employees	6,01	6,97	-	-
Total	9,85	10,01	-	-
Regular staff appraisals - percentage of appraisals that have taken place vs. planned interviews				
Senior management	34%	39%	0	0
Managers and supervisors	82%	67%	0	0
Other employees	82%	66%	0	0
Total	80%	64%	0	0
Regular employee appraisals - average number of appraisals conducted per employee				
Senior management	0,38	0,42	0	0
Managers and supervisors	0,95	0,80	0	0

Other employees	0,69	0,60	0	0
Total	0,75	0,63	0	0
Average number of training hours for non-employees				
Persons working on the basis of civil law contracts (orders and works)	0,86	1,22	-	-
Persons working on the basis of a cooperation agreement (B2B)	-	-	0,00	-
Persons on external contracts	-	-	-	-
Total	-	-	0,00	-

The data comes from Agora S.A.'s employee department.

S1-14 HEALTH AND SAFETY METRICS

In addition to meeting legal and formal requirements related to ensuring safe working conditions, Agora takes measures to prevent accidents and injuries in the workplace. In-house training - initial and periodic health and safety training, as well as fire training - takes place regularly at the company. Agora uses an external company to provide comprehensive HSE services and the support of a HSE inspector.

In addition, due to the specific nature of the work, a health and safety management system based on the OHSAS-18001:2007 standard has been implemented at the printing plant. The system allows for the identification and analysis of potential hazards and the assessment of associated occupational risks, which are then used as the basis for designing and planning activities and programmes to improve employee safety.

At Agora, hazards and the number of accidents are regularly monitored in the form of an accident register at Group level and separately for each company.

The following tables present accident data for the Agora Group and the parent company Agora S.A.. Some information (concerning persons other than proprietary employees) has not been reported before and is subject to inclusion in the disclosure for the first time for 2023.

Table 4.13 Accidents in the Agora Group

Period	2022	2023	y/y change
Accidents among employees			
Light accidents	5	6	20%
Serious accidents	0	0	-
Fatal accidents	0	0	-
Group accidents	0	0	-
Total number of accidents	5	6	20%
Accidents to non-employees			
Light accidents	-	1	-
Serious accidents	-	0	-
Fatal accidents	-	0	-

Group accidents	-	0	-
Total number of accidents	-	1	-
Accidents among employees of subcontractors working on site			
Light accidents	-	2	-
Serious accidents	-	0	-
Fatal accidents	-	0	-
Group accidents	-	0	-
Total number of accidents	-	2	-

The data comes from the employee departments of the Agora Group

Table 4.14 Accidents at Agora S.A.

Period	2022	2023	Y/Y change
Accidents among employees			
Light accidents	5	2	-60%
Serious accidents	0	0	-
Fatal accidents	0	0	-
Group accidents	0	0	-
Total number of accidents	5	2	-60%
Accidents to non-employees			
Light accidents	-	0	-
Serious accidents	-	0	-
Fatal accidents	-	0	-
Group accidents	-	0	-
Total number of accidents	-	0	-
Accidents among employees of subcontractors working on site			
Light accidents	-	0	-
Serious accidents	-	0	-
Fatal accidents	-	0	-
Group accidents	-	0	-
Total number of accidents	-	0	-

The data comes from Agora S.A.'s employee department.

Table 4.15: Other issues in the Agora Group

Employees	2022	2023	y/y change
Number of cases of registered occupational diseases	-	0	-

Number of days of incapacity	41	170	+315%
Non-employees	2022	2023	Y/Y change
Number of cases of registered occupational diseases	-	0	-
Number of days of incapacity	-	13	-

The data comes from the employee departments of the Agora Group

Table 4.16 Other issues at Agora S.A.

Employees	2022	2023	y/y change
Number of cases of registered occupational diseases	-	0	-
Number of days of incapacity	41	15	-63%
Non-employees	2022	2023	y/y change
Number of cases of registered occupational diseases	-	0	-
Number of days of incapacity	-	0	-

The data comes from Agora S.A.'s employee department.

In 2023, there were no accidents among employees or subcontractors working at the Agora Group. There were also no incidents of work (of full-time employees or subcontractors) in conditions exceeding the maximum permissible concentrations (MELs) or maximum permissible intensities (MELs).

S1-15 WORK-LIFE BALANCE

Table 4.17: Parental leave in the Agora Group

Period	2023			
Gender	Women	Men	Others	Not disclosed
% of employees entitled to parental leave	100%	100%	-	-
% of authorised employees who have taken parental leave	5,13%	1,67%	-	-

The data comes from the employee departments of the Agora Group

Table 4.18: Parental leave at Agora S.A.

Period	2023
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Gender	Women	Men	Others	Not disclosed
% of employees entitled to parental leave	100,00%	100,00%	-	-
% of authorised employees who have taken parental leave	6,00%	2,74%	-	-

The data comes from Agora S.A.'s employee department.

S1-16 REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

This subsection presents data on the wage gap in the Agora Group. The subject of the pay gap is one of the priority areas of the Group's efforts to protect diversity and ensure equal opportunities. The Group's approach to this topic is determined by the policies adopted, including in particular the Code of Ethics [described in disclosure **G1-1 Corporate Culture and Conduct Policies**].

Unadjusted pay gap

The *Gender Pay Gap* for the Agora Group increased from 13.4% to 14.2%, remaining lower than the *Gender Pay Gap* for Poland of 14.7%¹³ and close to the EU average of 13.2% in 2022. The *Gender Pay Gap* in the senior management category also increased from 8.5% in 2022 to 16.95%. These increases are due to structural changes in the Group, the results presented were also influenced by the consolidation of Agora with the Eurozet Group from 27 February 2023.

Table 4.19 Agora Group unadjusted pay gap ratio

Agora Group	
Period	2023
Gender Pay Gap (%)	14,16%

Agora Group	
Gender Pay Gap, including:	2023
Senior management	16,95%
Managers and supervisors	4,02%
Other employees	12,97%
Average gross hourly wage + variable allowances	
Senior management	17,67%
Managers and supervisors	0,82%
Other employees	11,98%

The data comes from the employee departments of the Agora Group

¹³ Source: *Gender Pay Gap Statistic 2022*

https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Gender_pay_gap_statistics

Table 4.20 Unadjusted pay gap ratio at Agora S.A.

Gender Pay Gap, including:	2023
Senior management	7,61%
Managers and supervisors	7,94%
Other employees	15,91%
Average gross hourly wage + variable allowances	
Senior management	3,81%
Managers and supervisors	7,14%
Other employees	14,29%

The data comes from Agora S.A.'s employee department.

Table 4.2: Agora Group's unadjusted wage gap ratio over 2020-2023.

Period	2020	2021	2022	2023
Senior management		15,0%	8,5%	16,95%
Managers and supervisors	6,0%	1,5%	1,2%	4,02%
Other employees	3,8%	9,0%	8,7%	12,97%
All employees	-	13,8%	13,4%	14,16%

The data comes from the employee departments of the Agora Group

Adjusted page gap

Agora S.A.'s human resources department calculated the *Gender Pay Gap* indicator in an adjusted version, i.e. taking into account the pay levels at each grade level and their gender pay gap. It then calculated this for the entire organisation using the weighted average method. As a weighting, the HR team took the ratio of employment in each grade level to total employment.¹⁴

Agora S.A.'s human resources department decided on this method of calculation because the number of employees at each grade level varies significantly. There are employment levels where women earn less on average, as well as levels where women earn more on average than men.

The 'grades' with the greatest weighting with this methodology are those in which abundance is greatest and which also have the greatest impact. With this method, the number of men and women in each 'grade' does not have a significant impact.

Finally, calculating by this method, the wage gap at Agora S.A. is 7.12% (in 2022 it was 7.0%).

In contrast, in the Agora Group, the adjusted wage lula, calculated using the weighted average method after grades, is 8.2% (in 2022 it was 6.8%).

¹⁴ The calculation includes individual Group companies: Agora Finanse Sp. z o.o., Agora S.A., Agora TC Sp. z o.o., AMS S.A., AMS Serwis Sp. z o.o., Doradztwo mediowe Sp. z o.o., Goldenline Sp. z o.o., Agora Radio Group Sp. z o.o., HRlink Sp. z o.o., Inforadio Sp. z o.o., Next Film Sp. z o.o., Optimizers Sp. z o.o., VIDEO OOH Sp. z o.o., Yieldbird Sp. z o.o.

S1-17 INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

In 2023, 28 whistleblowing reports were received from the Agora Group through whistleblowing channels, 16 of which were from Agora S.A. itself. The processes for nullifying negative impacts and the whistleblowing channels are detailed within the **ESRS** disclosure **G1-1**.

11 reports in Agora S.A. and a total of 23 reports in the Agora Group contained allegations relating to discrimination, including harassment or allegations of mobbing. This does not mean that they were confirmed.

During the reporting period, no cases of serious human rights incidents (e.g. forced labour, human trafficking or child labour) were identified.

S2 WORKERS IN THE VALUE CHAIN

SBM-2 STAKEHOLDER INTERESTS AND OPINIONS

As a Polish media company operating in various media fields, the Agora Group relies on a broad spectrum of suppliers with different specialisations. The entities that cooperate with the Agora Group include both business entities and individuals. In the first line are companies from the technology sector, whose employees are located globally and the nature of their work is mainly intellectual.

However, there are also suppliers in the downstream segments of the supply chain, including energy raw materials, semi-finished products and components for machinery. In these areas, the work often has a physical dimension. The Agora Group plans to further define and detail the issues related to these segments of the value chain and the employees working in these areas in the coming years.

Specific suppliers working with the Agora Group:



SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The Agora Group conducts its relations with suppliers in a way that aims to prevent negative impacts on employees in the value chain.

None of the companies in the Agora Group in 2023 established cooperation with contractors from the Russian and Belarusian regions.

S2-1 POLICIES RELATED TO VALUE CHAIN WORKERS

Agora has a **Collection of Rules of Conduct for Suppliers and Subcontractors of Agora S.A.**, which compiles the most important rules of cooperation for suppliers and subcontractors. At the same time, Agora's subcontractors have been obliged to familiarise themselves with and comply with the rules set out in this document. In H1 2024, the *Set of Rules of Conduct for Suppliers and Subcontractors of Agora S.A.* will be replaced by the *Code of Conduct for Suppliers and Subcontractors of the Agora Group*, which has been under development since 2023. The regulation will be adopted across the Agora Group.

S2-2 PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

In 2023, there was no systemic approach involving supply chain employees.

S2-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

Agora has a whistleblowing system in place. Reporting can be done through an external entity - the Ethics Line (e-mail: agora@liniaetyki.pl, website: agora.liniaetyki.pl), or by contacting Agora's Compliance Officer (e-mail: etyka@agora.pl). Submissions are dealt with in a fair manner, based on transparent principles.

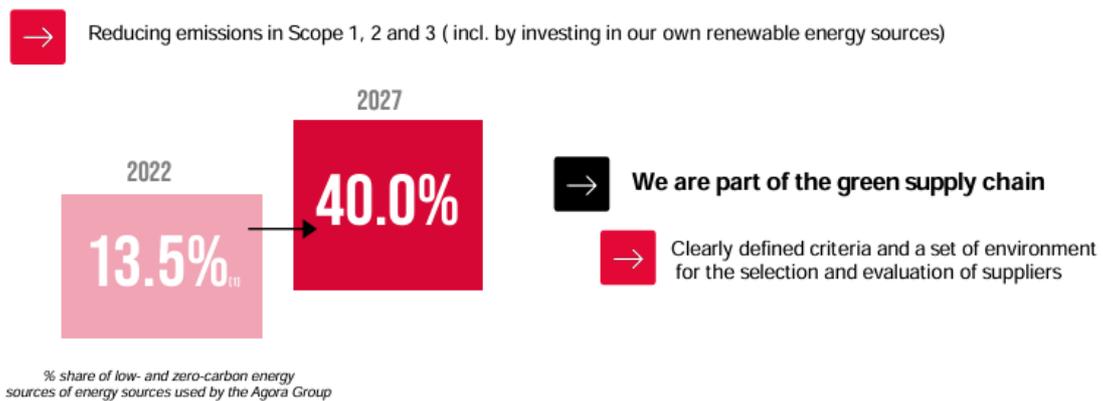
The processes for nullifying negative influences and the channels for reporting problems by the entity's employees as well as its employees in the value chain are detailed within the **ESRS** disclosure **G1-1** and **ESRS G-2**.

S2-4 TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTION

One of Agora's strategic objectives is to implement a new code of cooperation with suppliers and subcontractors, aligned with the requirements and recommendations set out in the CSRD. This will be published in 2024, as reported under **ESRS** disclosure **G1-2**

S2-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

As part of its ESG strategy, the Agora Group has set itself the goal of reducing greenhouse gas emissions in all parts of its business, including its supply chain.



The first step towards achieving the goal is to implement the *Agora Group's Code of Conduct for suppliers and subcontractors* and to establish environmental criteria for the selection and evaluation of suppliers under the *Agora Group's Environmental and Climate Policy* in 2024. The Code aims to establish ethical standards and

rules of conduct for business partners that will support sustainability goals, including contributing to the mitigation of greenhouse gases within media operations.

S3 LOCAL COMMUNITIES (AFFECTED COMMUNITIES)

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The social area is the sphere in which the Agora Group, as a publisher of independent media, has been involved in projects for the benefit of society since the beginning of its existence, which allows it to carry out its ESG activities to the greatest extent. Agora actively participates in various social initiatives for the benefit of local communities, such as organising cultural events, supporting local charities or promoting education and culture.

Agora Group's impact on local communities is significant due to its extensive operations and presence in various regions of Poland. Through its media, the company plays an important role in shaping public opinion, social discourse and debates on political, social and cultural issues. Agora's activities can influence what content is available to local communities, what values are promoted and what topics are discussed in the public space.

In many aspects of the Agora Group's business, which is based on the publication of content, there is a risk of liability or co-responsibility of the publisher for the dissemination of illegal information, including information infringing personal rights. It cannot be ruled out that the company could inadvertently infringe such rights, which could result in claims being brought on this account and, consequently, the need to pay appropriate damages.

AMS's fundamental objective is to develop pro-ecological solutions in the spirit of smart city in Polish cities, including the promotion of smart and eco solutions among municipal authorities and residents.

The Agora Group's operations currently do not diagnose any negative impact on local communities or risks related to child labour, forced labour or other human rights violations. Agora demonstrates due diligence on this topic, in line with the *UN Guiding Principles on Business and Human Rights* and the *Declaration of the International Labour Organisation*.

S3-1 POLICIES RELATED TO AFFECTED COMMUNITIES

The Agora Group has a ***Policy for Social and Sponsorship Activities*** adopted by the Agora Board of Directors in 2016 as an expression of a strategic approach to corporate social responsibility. The objectives set out in the document are:

- education, individual and social development;
- shaping civic attitudes and caring for human rights;
- promotion of culture and universal access to it;
- promoting health and a healthy lifestyle;
- concern for the environment;
- concern for others expressed through charitable and relief work.

They refer to specific UN Sustainable Development Goals and the ISO 26000 social responsibility standard.

The social-sponsoring activities of the Agora Group are an expression of its social responsibility and concern for the fate of the regions in which the Group operates as places worth living, working and making plans for. These activities are also aimed at building a positive image of the Group and its brands as entities friendly to people and involved in the life of the community.

Donations granted by the Agora Group for social purposes in 2023, amounted to over **PLN 1.2 million**. In the reported period, no expenditure was incurred on sponsorship activities.

In Agora's opinion, the implementation of the *Social and Sponsoring Activities Policy* is in the interest of the company and its stakeholders, including shareholders, as it creates goodwill, contributes to social development and is an expression of the Agora Group's responsibility for its impact on the environment.

S3-1 PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

Social activities, in addition to the activities of the Agora Group's brands and media, are carried out systemically by foundations established by the Management Board of Agora S.A. and by other Group companies. At the end of 2023, there were 6 organisations: Agora Foundation, *Gazeta Wyborcza Foundation* and *Wysokich Obcasów Foundation*, *Academy of Integration - Work, Education, Sport* AMS Foundation, TOK FM Foundation and Radio ZET Foundation.

The Agora Foundation was established in October 2004. Since 2005 it has had the status of a public benefit organisation (PBO). In recent years, Agora's Foundation has focused on co-organising and financing social campaigns carried out jointly with *Gazeta Wyborcza* and is engaged in charitable activities. Agora's Foundation has also co-financed, inter alia, the NIKE Literary Award since its inception. Detailed information on the activities of the Agora Foundation can be found at: fundacjaagory.pl.

The Integration Academy Foundation - Work, Education, Sport was established by AMS S.A. in 2013 and is a continuation of the *AMS for Integration* project. The Foundation deals with widely understood problems and issues related to the life, activity and social role of people with disabilities, as well as with the comprehensive education of young people. Information about the Foundation's current projects can be found at: akademiaintegracji.pl

The Gazeta Wyborcza Foundation was established by Agora in 2018 to develop valuable media projects and pursue important social objectives, including contributing to the production of more independent and ambitious journalistic material on major social and political issues, e.g. investigative reporting, environmental reporting and international journalistic projects. You can read about the Foundation's projects at: fundacijagazetywyborcza.pl. Also in 2018, for a similar purpose, Agora and the *Wysokie Obcasy* brand established the **Wysokich Obcasów Foundation**.

In 2020, the Management Board of Agora Radio Group established the **TOK FM Foundation**. Its mission is to promote valuable and reliable journalism addressing socially important topics such as equality, tolerance and the promotion of the economy, law, culture and sport and climate protection.

As of 2022, **Radio ZET Foundation** has joined the group of social organisations operating within the Agora Group. The Foundation helps people in special need - the sick, with various disabilities - mainly children in difficult financial situation. Information on current projects of the Foundation can be found on the website: www.fundacjaradiazet.pl.

S3-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR LOCAL COMMUNITIES („AFFECTED COMMUNITIES)

Agora's whistleblowing and breach reporting system, as well as the mitigation of negative impacts with regard to possible problem reports from the local community (from outside the organisation) Agora provides a phone number and email address for contacting the parent company's ESG department or Compliance Officer at www.agora.pl/kontakt.

The processes for nullifying negative impacts and reporting channels are described under **ESRS** requirement **G1-1** and **ESRS G-2**.

S3-4 TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS

The Agora Group's activities for the benefit of local communities, largely take place through the involvement of readers and audiences, employees and local communities in projects directly supporting social organisations and promoting philanthropy and philanthropy.

As part of its social activities, Agora's media undertook many activities in 2023 to support diversity in society. Some of the projects concerned sustainable cities and the lives of their inhabitants in various regions of Poland. Information on Agora Group's activities in the area of corporate social responsibility (ESG) is published on an ongoing basis on the website: www.agora.pl/news/esg.

Among other internal activities, a mentoring project has been launched, whereby employees of the Agora Group can support the charges of the Tworzemy Foundation - an organisation dedicated to supporting aspiring young people in entering adulthood and developing the competencies necessary to take up their dream jobs.

S3-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

In the coming year, the Agora Group will continue its educational mission, focusing on building public awareness on issues important from an ethical, sociological, political, scientific and cultural perspective, as well as those concerning the environment and climate. To this end, it plans to establish partnerships and carry out further projects, especially those related to media education and the fight against disinformation, as well as to take action in favour of freedom of speech and media pluralism.

A priority for 2024 is to implement an employee volunteer programme at the Agora Group, which will enable the entire team to engage in pro-social activities on a wider scale than before. This activity is aimed at strengthening social ties within the company and increasing employee involvement in initiatives for local communities and social problems. By directly involving employees in pro-social activities, the Agora Group will be able to even more effectively pursue its educational mission and support initiatives with a positive impact on society.

S4 CONSUMERS AND END-USERS

SBM-2 STAKEHOLDER INTERESTS AND OPINIONS

The Agora Group offers a variety of services and products. Its individual businesses include, among others, press publishing, development and operation of Internet portals, websites and mobile applications, radio, cinema and catering activities, film production and distribution, advertising and printing activities.

Agora Group companies are also looking for solutions to ensure that their products and services are accessible to the widest possible audience - especially to vulnerable and excluded groups.

SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Consumers and end-users of the Agora Group's products and services make up a large proportion of local communities [described within **ESRS** disclosure **S3 SBM**].

S4-1 POLICIES RELATED TO CONSUMERS AND END-USERS

The company's internal and external regulations (codes, good practices, rules and regulations) ensure that customers and clients receive high quality services and products and reflect the Group's approach in this regard.

The companies of the Agora Group make available regulations setting out the terms and conditions for the use of products and services, including purchase on their websites, returns or complaints, as well as obligatory regulations and policies such as privacy, among others.

The content of the published advertising material is governed by the **General Rules for Placing Advertisements and Announcements in Agora S.A. publications**. The document reserves the publication of advertisements/announcements that are contrary to the law and/or good principles of social co-existence.

S4-2 PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

In the case of customer relations, in addition to the internal rules and procedures, there is the Agora **Group's Code of Good Practice in Customer Service**, which was introduced to improve the interaction between Agora Group employees and customers, readers and users. It complements the **Code of Ethics** to ensure consistency in the actions taken and to enhance their effectiveness.

The main principles set out in the *Agora Group's Code of Good Practice in Customer Service*:

- adherence to high ethical standards;
- responsibility for the products and services offered and their quality;
- clear and comprehensible rules for the use of products and services;
- transparent marketing communication.

S4-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

Customers and end consumers have a variety of options for contacting user support, provided by the Agora Group on the websites of the individual companies.

In addition to telephone contact, it is possible to contact customer service online - via the contact form on the website, email or social media, and occasionally by post.

Consumers and end users have the possibility to contact and report any problems, while the website www.agora.pl/kontakt provides contacts to individual brands and Agora companies. In addition, the websites dedicated to the individual brands that make up the Agora Group contain contact details for customers and end consumers.

The Agora Group companies have established bylaws that define the terms, scope and conditions for the use of products and services/services/apps by the buyer/user, including purchase, return and complaints.

S4-4 ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

The Agora Group is committed to ensuring the high quality of its content and services delivered to customers and end users by applying appropriate editorial standards, quality control procedures and monitoring production and distribution processes.

In addition, it systematically analyses the needs and expectations of its customers and end users, using tools such as market research and data analysis.

In addition, Agora identifies significant risks associated with its media activities and takes appropriate measures to reduce or eliminate them. This includes risks related to violations of journalistic ethics, copyright or information security.

As part of its activities, the Agora Group engages its customers and media consumers in educational initiatives to raise consumer awareness of the media, information and the fight against disinformation. It organises workshops, meetings and educational campaigns to make end users aware of the importance of critical thinking and the ability to assess the credibility of information.

S4-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

The goal of the Agora Group's media and brands is to provide quality products and services, as well as reliable information and valuable cultural materials that meet the expectations and needs of customers, while contributing to increasing positive impact on the environment and developing corporate social responsibility projects.

Agora's media periodically conduct surveys among its users and readers, asking them for their opinions and suggestions. The main findings are used, among other things, to improve the work of the services and to respond quickly to their expectations by adapting the offer and services to changing customer preferences.

IV. INFORMATION RELATED TO GOVERNANCE

G1 BUSINESS CONDUCT

GOV-1 THE ROLE OF ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES

The role of the administrative, supervisory and management bodies during the reporting year is described within the **ESRS-1** disclosure.

G1-1 CORPORATE CULTURE AND BUSINESS POLICIES

The establishment of Agora S.A. was associated with an important mission, which continues to this day: to provide access to an independent source of information, the pursuit of truth, the need to analyse events in Poland and around the world and present their impact on the life of every citizen, and the fight for respect for human rights, in particular for equality and freedom of speech. The fundamental values guiding the organisation include transparency, openness and dialogue, building lasting relations with the environment and promoting diversity in society and the workplace. This is why, since its inception, Agora has continuously contributed to the building of civil society, supporting institutions that uphold the independence of the media and democracy, publicising important social issues and initiating action for the environment. Embedded in this process is an endeavour to identify and remedy any negative effects that might be caused by its activities.

Agora takes full account of these principles, thus supporting the tenets of *the Universal Declaration of Human Rights* and *the Charter of Fundamental Rights of the European Union*, and systematically implements them by setting appropriate standards of conduct and introducing relevant internal regulations.

These documents are in line with international conventions and guidelines, taking into account, among other things:

- ▶ *UN Guiding Principles on Business and Human Rights*, including the principles and rights set out in the eight core conventions identified in the *International Labour Organisation's Declaration* on

Fundamental Principles and Rights at Work, the principles and rights set out in the *International Bill of Human Rights and the UN Convention against Corruption*;

- OECD Guidelines for Multinational Enterprises;
- 10 Principles of the UN Global Compact;
- WSE Best Practice 2021;
- UN Global Compact principles and the UN Sustainable Development Goals (SDGs);
- Task Force on Climate-Related Financial Disclosures (TCFD).

Agora S.A.'s Compliance Team oversees the company's internal regulations. This team also supports the risk management process in the event of actions that do not comply with the law, internal regulations and the values and ethics adopted by the organisation.

The compliance system consists of the following elements:

- identifying risks, subjecting them to assessment, control and monitoring;
- recommendation of action to improve processes and eliminate risks;
- responsibility for the whistleblowing system - receiving reports and conducting investigations;
- indicating actions in compliance with generally applicable law, the requirements of internal regulations, as well as the ethical conduct of the organisation's business.

Within Agora S.A. there is a Compliance Officer who acts independently and reports to the Management Board and the Audit Committee of the company's Supervisory Board. Any employee or co-worker of the company may approach the Compliance Officer and share his or her concerns regarding the conduct of other employees or co-workers, management and suppliers. His or her role is to answer questions and address concerns in the area of compliance with the law and internal regulations, as well as to receive reports on irregularities. In the Agora Group, in addition to Agora S.A., a Compliance Officer has also been appointed in the company Helios S.A.

AGORA CODE OF ETHICS

Agora S.A.'s Code of Ethics is a key document indicating a set of values and rules of conduct expected at Agora, as well as those which the Company considers inappropriate or unacceptable. Agora's *Code of Ethics* is addressed to all employees and associates of Agora S.A., regardless of their function or position in the Company.

In particular, the document includes:

- the principles to be followed by employees, associates and management in their relations with all the Company's stakeholders;
- a compilation of the most important internal regulations covering areas relevant to the Company's operations and the values indicated in Agora's "Code of Ethics";
- information on channels and how to report irregularities at Agora;
- contact details for persons who can provide information and clarification on ethics-related topics.

Agora's Code of Ethics is supplemented by:

- Agora's internal procedures, in particular: Agora **Group's Diversity Policy**, **Agora S.A.'s Policy on Receiving and Giving Gifts and Other Benefits**, **Agora Group's Policy on Social and Sponsoring Activities**, **Agora Group's Code of Good Practice in Customer Service**, **Agora S.A.'s Environmental Policy**, **Agora S.A.'s Compliance Policy**;

- External industry codes adopted as applicable at Agora, in particular: *Media Ethics Charter*, *Code of Advertising Ethics*, *Code of Good Practice for Press Publishers*.

Training on Agora's *Code of Ethics* is available on Agora's internal training platform and every employee, associate and officer is required to read it.

WHISTLEBLOWER SYSTEM

At Agora, as of May 2023, there are two procedures governing the whistleblowing system: **The Whistleblowing Procedure** and the **Investigation Procedure**. The first of these documents contains content relevant to a person considering making a report - there is information about reporting channels, the principle of confidentiality and general information about the process of recognising a report. *The Investigation Procedure*, on the other hand, regulates the process of recognising a case until its conclusion, i.e. the creation of a report and the monitoring of the implementation of recommendations. This procedure guarantees a fair investigation of each report, based on transparent rules.

The new regulations allow the reporting of all types of violations, i.e. irregularities related to bullying, discrimination, fraud and abuse of power, as well as irregularities related to the performance of professional duties, regardless of their category. Employees and co-workers can not only report violations, but also give their suggestions to improve the company's operations.

The company also works with an external company that provides an independent and confidential as well as anonymous whistleblowing system, the Ethics Line. This system makes it possible to report violations affecting all group companies.

Through a series of measures that guarantee the confidentiality of reports and proceedings, Agora seeks to protect whistleblowers and witnesses and to limit the impact that ongoing proceedings may have on the day-to-day atmosphere in the organisation. Internal procedures establish a prohibition on retaliation. The aim of any investigation is to remedy the consequences of the breach and prevent future violations.

The Compliance Officer accepts whistleblowing information reported in person, by telephone or by email. The Ethics Line, on the other hand, allows reports to be made by telephone, e-mail or through a dedicated form. The Ethics Line system allows the whistleblower to follow the progress of the case and correspond with the Compliance Officer while maintaining anonymity. For reports made through the Ethics Line, the specialists working for the entity make an initial assessment of the report and provide a recommendation for further action.

When a report is received, it is initially assessed by the Compliance Officer or the Ethics Line and a decision is made as to whether it should be handled on a one-person basis or whether an Ethics Committee should be set up. One-person handling is reserved for simpler cases that do not require extensive investigation, while an ethics committee is appointed for more complex cases. The composition of the committee depends on the subject matter of the complaint, and it is made up of persons who have knowledge useful for the examination of the case - this may include, for example, a psychologist, lawyer, analyst, computer scientist. In all cases, however, they must be people who ensure the impartiality of the proceedings. In some cases we use the support of external specialists.

All members of the committee sign a confidentiality undertaking. The Ethics Committee's work results in a report with conclusions on whether or not a breach has taken place. The report also contains recommendations to eliminate the effects of the breach and to prevent it from recurring in the future. The Compliance Officer is responsible for monitoring implementation of the recommendations.

At Agora, the whistleblowing system does not limit reporting to employees and colleagues only. Reporting can also be done by Business Partners and value chain representatives. If there are suspicions or signals of

violations or other irregularities on the part of the Agora Group or persons acting on its behalf, of which an employee from the value chain has become aware in connection with cooperation with any of the companies in the organisation, he or she may report anonymously through the external Ethics Line channel (e-mail: agora@liniaetyki.pl, website: agora.linieetyki.pl), or contact Agora's Compliance Officer directly (e-mail: etyka@agora.pl).

The entire whistleblowing system and, in particular, the case investigation process, are independent of the company's management, which only receives the final investigation report. The report contains findings as to whether the reported irregularities actually occurred and recommendations for further action. On the basis of the report and its recommendations, the board of directors decides what to do to remove the effects of the violations and eliminate the risk that they will occur in the future.

CORPORATE CULTURE

The basis for conducting activities and shaping the corporate culture in the Agora Group is the training and workshops conducted to sensitise employees to the above-mentioned issues, to shape attitudes in line with the Group's principles and rules, to inform them of updates to the various documents and to consolidate their knowledge of them.

Internal communication is also key, for which Agora S.A.'s PR department is responsible, working in tandem with, among others, the HR, Compliance, ESG and administration departments, and making key information available to employees on the intranet and in an internal newsletter.

Agora Group communicates its corporate social responsibility (ESG) activities, including due diligence issues, by publishing relevant documents, statements or press releases on its corporate website www.agora.pl under the ESG tab. The website also provides a contact point for the company's PR, IR and ESG teams should external stakeholders wish to comment on the documents or seek additional information.

All activities are undertaken in compliance with the legal order applicable in Poland. As a company listed on the Warsaw Stock Exchange, Agora also complies with the principles contained in the *WSE's Best Practices 2021*, which shape our relations with the market environment.

In 2023. Agora has joined the United Nations Global Compact, the world's largest initiative that brings together companies and institutions committed to sustainable development. By joining the initiative, it has committed to adhere to the Ten Principles of the United Nations Global Compact and to the implementation of the United Nations 2023 Agenda in its business operations, with a particular focus on the four areas described herein:

- protection of human rights;
- working conditions;
- environmental protection;
- anti-corruption.

In the context of its operations, which do not involve industry or services using animals, the Agora Group has not established a formal policy relating to animal welfare.

The company does not distinguish between business or entrepreneurial topics in its training policy.

G1-2 MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

Running a business as diverse and extensive as the Agora Group's requires daily cooperation with many suppliers and contractors. Procurement is carried out in accordance with legal principles and internal procedures.

For this reason, Agora chooses to work only with entities that are able to declare that they share our approach to corporate social responsibility and sustainability, and comply with the law and ethical standards in the execution of their contracts with us.

On the basis of the principles set out in Agora S.A.'s *Code of Ethics*, ***a Set of Principles of Conduct for Agora's Suppliers and Subcontractors*** has been developed, which brings together the most important principles of cooperation for suppliers and subcontractors - in particular with regard to respect for human rights, the environment and compliance with applicable laws and anti-corruption. In H1 2024, *Agora S.A.'s Set of Principles of Conduct for Suppliers and Subcontractors* will be replaced by the *Code of Conduct for Suppliers and Subcontractors of the Agora Group*, which has been under development since 2023. The regulation will be adopted across the Agora Group.

In 2023, Agora did not terminate its cooperation with its suppliers from the chain indicated above due to the negative environmental impact of its activities or other ESG criteria.

G1-3 PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

In the interests of preventing and eliminating possible abuse, the organisation is committed to avoiding and, if this is not possible, disclosing and mitigating conflicts of interest. Any business or private relationships with external parties must not influence the factual, editorial or business decisions of Group companies.

The Agora Group operates in accordance with internal regulations and policies aimed at preventing corruption and bribery, thus meeting the requirements for listed companies in this regard.

Gift policy

Agora has a ***policy on receiving and giving gifts and other benefits at Agora S.A.*** (the so-called *gift policy*). This document defines the rules for receiving and giving gifts, the amount thresholds for the value of gifts that are subject to notification by employees, co-workers and members of the company's management. The *gift policy* is closely linked to *Agora's Code of Ethics* and applies to all employees, co-workers and members of Agora S.A.'s management. A report on the implementation of this policy is prepared annually and presented to the Board of Directors.

Addressing conflicts of interest

In 2022, The Management Board of Agora S.A. adopted ***a Conflict of Interest Management Policy***, which sets out standards for action to identify, manage and prevent conflicts of interest. Based on it, employees, associates and members of statutory bodies are obliged to inform their supervisor and the Compliance Officer of the occurrence or risk of a conflict of interest, who conducts an investigation and issues recommendations. The Compliance Officer maintains a classified register of conflicts of interest and supports the business in managing the risk of conflicts of interest on an ongoing basis.

Anti-Money Laundering and Countering the Financing of Terrorism

The Anti-Money Laundering and Financing of Terrorism Procedure at Agora S.A. and the Group Procedure for Anti-Money Laundering and Financing of Terrorism of Agora S.A. and Helios S.A. have been implemented at Agora in order to define the principles and procedures for the prevention of money laundering and financing of terrorism. In this way, Agora fulfils its obligations under the law. The procedure applies to everyone involved in the performance of activities related to the provision of accounting services to clients. Every employee, associate and member of management is required to be familiar with this procedure.

Any corrective processes are undertaken and reported to the Board of Directors as part of the ongoing information and periodic reporting. Similarly, the Compliance Officer and the Internal Auditor report periodically to the Audit Committee functioning within the Supervisory Board.

G1-4 CONFIRMED INCIDENT OF CORRUPTION OR BRIBERY

In 2023, there was no confirmed incident of violation of anti-corruption and anti-bribery laws in any of the Agora Group companies. This includes incidents involving employees, business partners. No contracts were terminated due to violations related to corruption or bribery.

During the reporting period, there were no legal cases of corruption or bribery brought against the company or its employees initiated or concluded.

G1-5 POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

Agora 2023 did not engage in lobbying or political activities.

Agora is not registered in the EU Transparency Register or in a Member State Transparency Register.

During the reporting period, no member of the company's bodies held a comparable position in public administration, including regulatory bodies, in the two years preceding their appointment.

G1-6 PAYMENT PRACTICES

Agora is diligent in ensuring that payments are made on time in accordance with business ethics and applicable legislation, including reference to small and medium-sized enterprises (SMEs).

- Trade payables are non-interest bearing and are settled within 14 to 30 days.
- Payables for taxes, duties and insurance are non-interest bearing and are settled monthly according to the due date.
- Current liabilities include amounts owed to related parties.

Agora's standard payment terms are payments in line with the dates specified in the respective contract. None of the group companies categorise their suppliers.

By the end of 2023, there were no pending legal proceedings in the Agora Group in relation to late payments.

V. COMPATIBILITY TABLES

COMPLIANCE WITH THE REQUIREMENTS OF THE ACCOUNTING ACT REGARDING THE DISCLOSURE OF NON-FINANCIAL INFORMATION

Requirements of the Accounting Act	Has the requirement been met?	Place in report - title of chapter	Page number
<i>Business model (Article 49b(2)(1))</i>	yes	General information	pp. 5-12
<i>Non-financial key performance indicators (Article 49b(2)(2))</i>	yes	Information on social issues Environmental information	pp. 35-96
<i>Policies in non-financial areas and their results (Article 49b(2)(3)):</i>	yes	General information Information on social issues Environmental information Information on governance	pp. 38-39, 73-76,92
<i>Environmental policy</i>	yes	Environmental information	pp. 38-39
<i>Policy in the social area</i>	yes	Information on social issues	p.89
<i>Human rights policy</i>	yes	Information on social issues Information on governance	pp.93-98
<i>Anti-corruption policy</i>	yes	Information on governance	pp. 98
<i>Staff policy</i>	yes	Information on governance	pp. 71-73, 90
<i>Due diligence procedures (Article 49b(2)(4))</i>	yes	General information Information on governance	p. 10
<i>Significant non-financial risks and how they are managed (Article 49b(2)(5))</i>	yes	General information	pp. 17-28

REPORT CONTACT

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Warsaw, 19 March 2024

Bartosz Hojka - President of the Management Board

Signed on the Polish original

Tomasz Jagiello - Member of the Management Board

Signed on the Polish original

Anna Krynska-Godlewska - Member of the Management Board

Signed on the Polish original

Tomasz Grabowski - Member of the Management Board

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Wojciech Bartkowiak - Member of the Management Board

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