

allegro

Code of Ethics and Conduct



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Introduction: Code of Ethics and Conduct — who and what is it for?

The Allegro Group Code of Ethics and Conduct (“Code”) is a set of basic ethical principles which should be complied with by:

- all companies of the Allegro Group (“Group”), i.e., all companies owned directly or indirectly by Allegro.eu, and
- all persons working in the Group on the basis of employment contracts or cooperating on the basis of other types of agreements such as civil law contracts (including as part of their business), or through temporary employment agencies (jointly referred to as “the Allegro Group Associates”), regardless of their career level.

The Code is Allegro’s “constitution,” a signpost showing how to maintain integrity, reliability, and high ethical standards in every aspect of our business. Together with [The Allegro Way](#),

a collection of behaviors that reflect a culture of respect, responsibility and continuous improvement, the Code is one of the foundations of the Allegro Group. Anyone who violates the Code must expect a firm response from the Allegro Group.

At least once every two years, the [Board of Directors of Allegro.eu](#) will review and approve the Code.

We want all the Allegro Group Associates to know and follow the Code, so we will organize regular, mandatory training sessions in order to popularize it. Any questions about the Code, can be addressed to the person responsible for operational supervision of the Code at compliance@allegro.com.





Culture of reacting, whistleblowing procedure

An important element of ethical business is the culture of reacting to behaviors that are contrary to the law, the Code, company policies, the principles of social coexistence, or are harmful to others. In the Allegro Group, we promote openness and an active approach to solving irregularities. Therefore, we encourage anyone who experiences or witnesses irregularities at the workplace or in the context of the Allegro Group's business to react — to intervene, report them to managers and use company procedures.

Quick detection of irregularities allows us to respond to potential threats early. As a result, our workplace and business remain fair, transparent and in line with the highest standards.

We promote an environment where every whistleblower can feel safe. We have also implemented procedures for reporting and responding to issues that protect whistleblowers from retaliation.





How to report concerns?

We know that certain situations are so sensitive that it may be impossible or stressful to intervene on one's own or report them to your manager, so we offer a few simple and safe ways to ensure complete confidentiality:



Talk to the Risk & Compliance Manager: If you have any doubts about compliance with the Code, arrange a meeting with the Risk and Compliance Manager (rcm@allegro.com).



Talk to the Employee Relations Manager (ERM): Are you unsure about what to think about a situation you have found yourself in or have witnessed at the workplace in the context of relations between people working in the Allegro Group? Do you have an ethical dilemma in relation to an employee matter? Contact the ERM (erm@allegro.com) for advice.



Using the platform: You can submit your report via a secure platform accessible to everyone at <https://whistleblowing.allegrogroup.com>. In this way, it is also possible to make anonymous reports, while allowing communication with the whistleblower.



By email: You can send your report to whistleblowing@allegro.com.

Official reports are considered by the Ethics Committee. We treat each one confidentially and with due sincerity, regardless of who submits it. Our goal is to objectively examine every case, so all our actions are based on facts and detailed information. We treat every person involved in the investigation in a fair and respectful manner. Moreover, we specifically protect whistleblowers from retaliation.

The full content of the procedure can be found here: [link](#).



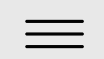
Ethics in practice



During a routine check-up, I noticed unusual financial transactions that could indicate financial fraud. What should I do?

Report your suspicions using one of the available channels. You can choose between a report submitted personally, by email, or through the secure whistleblowing platform available at <https://whistleblowing.allegrogroup.com>.





What kind of workplace do we create?

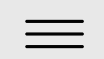
In the Allegro Group, we uphold an ethical, inclusive, and safe working environment where everyone is respected, treated with dignity, feels safe, supported, and is free to grow and learn from mistakes. As the basis of the relationship between the people working in the Group, regardless of their features, views, professional status, and the nature of their relationship, we promote respect, integrity, kindness, and a culture of communication.

We use systematic and objective criteria for assessing work outcomes to guarantee

transparency and integrity in management. We endeavor to ensure that every employee is clear about expectations and assessment criteria to eliminate potential misunderstandings and unfair treatment.

We all shape the environment in which we work, but a particular responsibility in this respect lies with managers and leaders. We believe that responsible leadership is crucial to building an ethical workplace and a healthy working atmosphere.





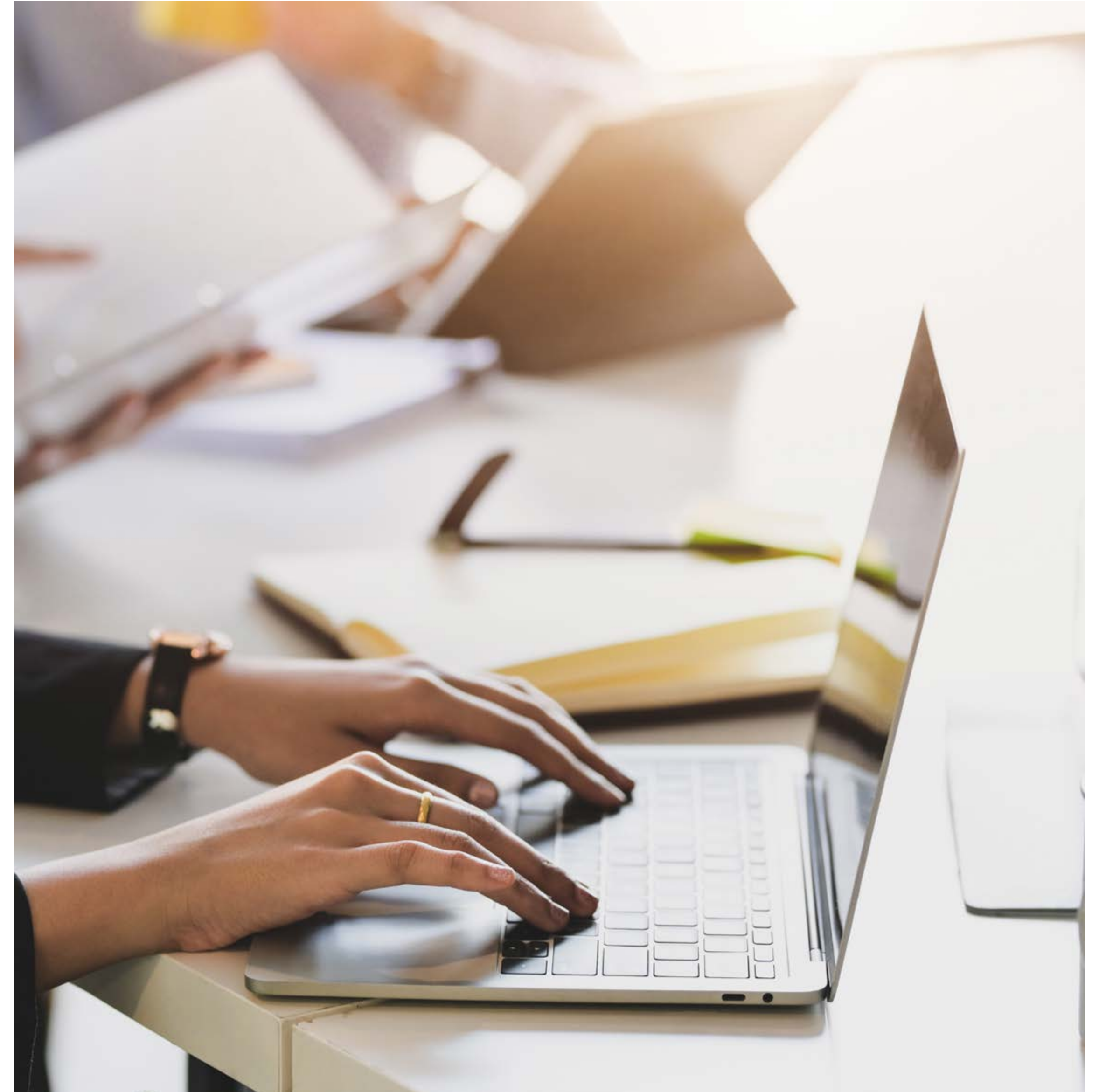
Occupational health and safety

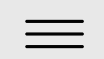
Our principles:

- 1. Safety for everyone** - Our priority is to ensure that all Allegro employees feel safe, regardless of their workplace (office, warehouse, remote work). That is why we create a safe and healthy working environment.
- 2. Education** - The OHS training is mandatory for all employees. New hires start with the OHS training, and all employees regularly participate in periodic training sessions to maintain a high level of safety awareness and knowledge.

3. Active prevention of workplace accidents:

- Safety and accident prevention procedures are regularly monitored, tested and updated as necessary.
- We conduct regular OHS audits at all locations to verify compliance with current requirements and reduce safety-related risks.
- We respond immediately to unsafe conditions, behaviors, and activities by promoting a proactive attitude among both managers and employees to eliminate workplace accidents.





Occupational health and safety

Do's:

- ✔ Comply with applicable OHS regulations and rules.
- ✔ Read and follow the OHS and fire safety procedures and instructions.
- ✔ Remember that an accident can happen to anyone.
- ✔ Take care of your physical and mental health.
- ✔ Pay attention to the safety of others working next to you.
- ✔ React when you see a hazardous situation.



Don'ts:

- ✘ Do not disregard OHS and fire safety requirements.
- ✘ Do not treat the safety of others as "their problem."
- ✘ Do not give up compliance with safety rules even in "emergency situations."

Human rights policy

Our principles:

1. Respect for human rights:

- The Allegro Group respects human rights — understood as rights specified in the International Bill of Human Rights/Universal Declaration of Human Rights, and fundamental human rights as defined in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work — in all aspects of its activities, including relations with and between persons working in the Group and relations with contractors and business partners.
- We expect our business partners to respect human rights on a level equal to our own standards.

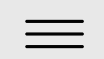
2. Prevention of violations:

- We are committed to preventing human rights violations and taking corrective action in the event of their occurrence.
- We prevent human rights violations in our business.

3. Education and awareness:

- We educate and improve the competences of the Group associates and our business partners in the field of human rights.
- We promote initiatives to disseminate knowledge about human rights and business responsibility.





Human rights policy

Do's:

- ✔ Respect human rights in all professional relations.
- ✔ Participate in human rights training and educational programs.
- ✔ Support initiatives that promote human rights at the workplace.



Don'ts:

- ✘ Do not ignore human rights violations near you.
- ✘ Do not participate in activities that may lead to human rights violations.
- ✘ Do not underestimate the importance of human rights education and awareness.

The full content of the policy can be found here: [link](#)



Diversity policy

Our principles:

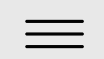
1. Equal treatment:

- We are committed to equal treatment of all the Group associates, regardless of gender, age, race, gender identity, sexual orientation, health status, nationality, religion, views, trade union membership, marital status, or lifestyle.
- All our processes, including recruitment, evaluation, and promotion, are based on objective and substantive criteria.

2. Support for diversity:

- We promote diversity at all levels of the organization, including within the Board of Directors.
- We adapt workplaces to the needs of people with disabilities and special needs.





Diversity policy

Do's:

- ✔ Treat all the Allegro Group associates equally.
- ✔ Engage in initiatives that promote diversity and inclusion.
- ✔ In interactions with others, express your feelings and needs with respect for the feelings and needs of others.



Don'ts:

- ✘ Do not tolerate discrimination or mobbing in any form.
- ✘ Do not use prejudices or stereotypes in professional relations.
- ✘ Do not ignore the needs of people with disabilities at the workplace.

The full content of the policy can be found here: [link](#)



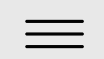
Prevention of undesirable phenomena, including discrimination, harassment, and mobbing

Our principles:

- 1. Zero tolerance policy:** We strongly oppose all forms of psychological and physical violence between the Allegro Group associates and any behaviors that may lead to physical or psychological violence at the workplace. We have a zero tolerance policy for mobbing, harassment, bullying, intimidation, and all forms of discrimination.
- 2. Prevention:** We implement the zero tolerance policy through annual preventive training and information activities for Allegro associates, as well as special training sessions dedicated to managers.

- 3. Intervention:** Any undesirable phenomena can be reported in several ways, in particular through a secure platform accessible to everyone at <https://whistleblowing.allegrogroup.com>, to the Chief Security Officer or Employee Relations Manager. Reports are investigated by the Ethics Committee.
- 4. Protection of whistleblowers:** Each report is treated confidentially. Moreover, whistleblowers are specifically protected from retaliation.





Prevention of undesirable phenomena, including discrimination, harassment, and mobbing

Do's:

- ✔ Treat each other with respect, integrity, and kindness.

- ✔ Provide and receive feedback in a constructive and kind manner.

- ✔ Actively react to any behavior that violates the principles of social coexistence or harms others.



Don'ts:

- ✘ Do not tolerate behaviors that create an unfriendly work environment, such as hate speech or passive-aggressive communication.

- ✘ Do not violate the dignity of subordinates, colleagues, or managers, e.g., by insulting them, treating them with disrespect, or spreading malicious gossip.

- ✘ Do not blame the person who reported the violations.

Remember!

Everyone has the right to their own space and boundaries. Respect the individual needs of others and communicate your expectations clearly. Before taking action, consider whether you might offend someone with your words or gestures.

The full content of the policy can be found here: [link](#)



Ethics in practice



While on the recruitment team, I noticed that the salary offered to female candidates was lower than the salary offered to male candidates for the same position. Is this consistent with the company's policy? Should I report it somewhere?

In accordance with the Allegro Group's Code of Ethics and Conduct and its policies (Diversity Policy, Policy Against Undesirable Phenomena, Including Discrimination, Mobbing, and Harassment), the company is committed to equal treatment for all employment candidates within the Group. Contact the person responsible for the recruitment process and ask for reasons for the differences in the salary offered. If you are afraid to talk to the person responsible for recruitment or their justification does not convince you, report the matter to the Risk & Compliance Manager or Employee Relations Manager, or use the platform at <https://whistleblowing.allegrogroup.com>.



How do we conduct business sustainably?

The Allegro Group believes that social responsibility and partnership are crucial to building sustainable business. Our activities focus on climate protection and supporting charitable, social, and sponsorship

initiatives to have a positive impact on the world around us.



Climate and environmental policy, and circularity and waste policy

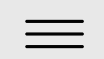
Our principles:

1. Climate protection measures:

- The Group's goal is to reduce negative environmental impact by reducing greenhouse gas (GHG) emissions and introducing circular economy solutions.
- We minimize our carbon footprint in accordance with the Science-Based Target methodology and accepted commitments.
- We minimize packaging consumption and introduce sustainable packaging into our own operations.
- We minimize environmental impact in areas hosting the company's operations and value chain.

2. Education:

- We educate and support our employees, business partners, sellers, and consumers on sustainability.
- We pay attention to responsible communication on the subject of sustainable development, using [“Good marketing and communication practices on green / sustainable development / ESG / CSR” in Allegro.](#)



Climate and environmental policy, and circularity and waste policy

Do's:

- ✔ Support the goals of minimizing carbon footprint and circular use of resources by proactively designing solutions and products.
- ✔ Carefully check the reliability of information about the declared pro-environmental effects of products or services to avoid greenwashing.
- ✔ Engage in initiatives that promote sustainable development and climate education.



Don'ts:

- ✘ Do not present as “ecological” any activities that do not have proven, real pro-environmental significance.
- ✘ Do not take part in activities that may adversely affect the environment and are in conflict with the company's objectives.
- ✘ Do not underestimate the importance of small steps: Segregate waste, save electricity and water, do not litter.

The full content of the policy can be found here: [link](#)

Charitable, Social and Sponsorship Activities Policy

Our principles:

1. Support for the community:

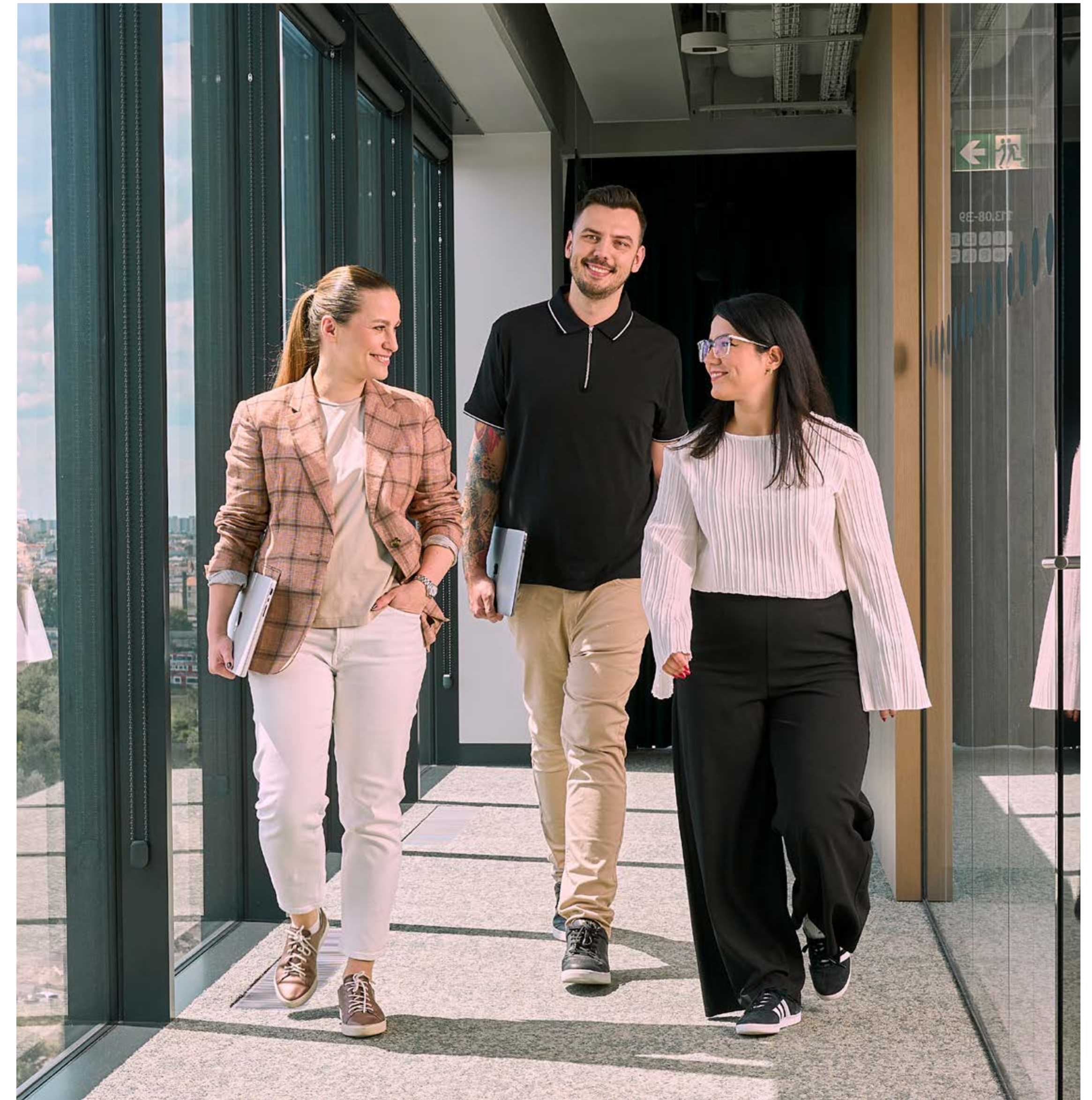
- The Allegro Group conducts charitable and social activities, supporting non-governmental organizations, educational institutions, health care institutions, and individuals.
- We promote activities focused on supporting education, environmental protection, respect for human rights, and professional activation.

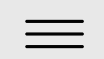
2. Sponsorship:

- Our sponsorship activities focus on building the brand image, promoting knowledge, and exchange of professional experience, as well as supporting educational initiatives.
- Sponsorship is implemented in line with internal regulations and industry codes.

3. Transparency and responsibility:

- We provide transparency in the spending of funds for charity, social and sponsorship purposes.
- We monitor and report expenses and activities under the charity and sponsorship policy.





Charitable, Social and Sponsorship Activities Policy

Do's:

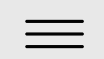
- ✔ Support charitable and social initiatives in line with the Allegro Group values.
- ✔ Engage in sponsorship projects that promote education and professional development, in collaboration with Allegro's CSR team.
- ✔ Ensure transparency and credibility in charitable and sponsorship activities by reporting them to csr@allegro.com.



Don'ts:

- ✘ As part of your activities for the Group, do not support, by sponsorship or charity, any organizations and initiatives that are contrary to the Group's policy, including employer organizations, professional self-governments, and sports clubs that are commercial law companies, political parties, foundations or associations they have established, as well as persons performing public functions and politicians, or other organizations that act contrary to other laws or good practices.
- ✘ Do not participate in activities of organizations that may adversely affect the image of the Allegro Group.

The full content of the policy can be found here: [link](#)

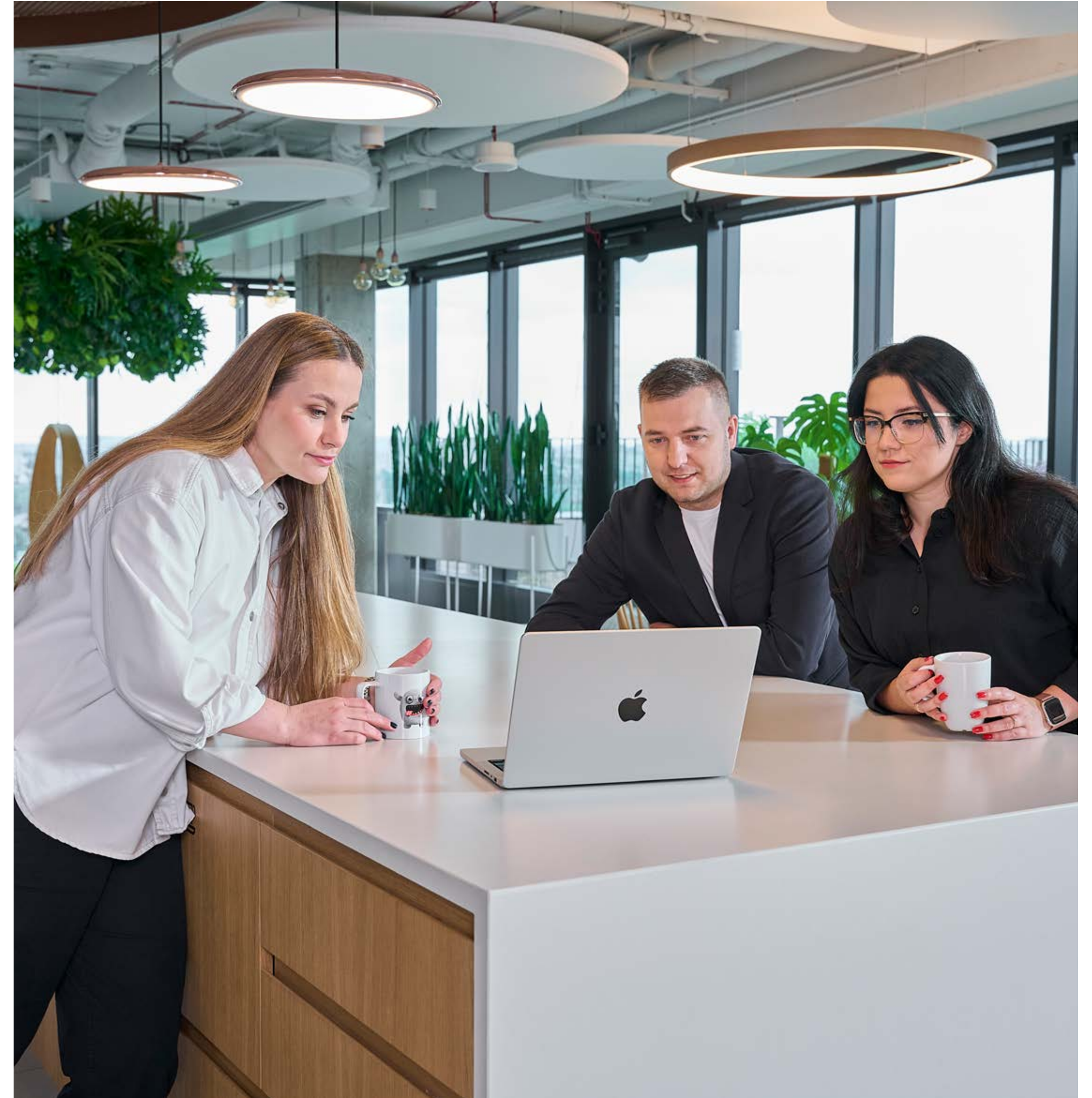


Ethics in practice:



A supplier advertises its product as ecological, green, and with low emissions. Can I use the same statements in my communication?

Ask for certificates or other confirmation that will reliably confirm the environmental performance of the product. Without reliable evidence, do not duplicate statements from the supplier, so as not to expose yourself to the risk of greenwashing.





How do we ensure ethical standards in business?

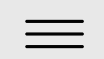
Counteracting corruption

The Allegro Group has a zero tolerance policy against corruption. For this purpose, we have created the Transparency Policy that applies to every employee, colleague, and business partner. It is the foundation of our business to ensure that all activities are conducted in a fair and transparent manner.

Our principles :

- The Allegro Group has a zero tolerance policy against corruption. We do not accept or give bribes in any form!
- Payments must correspond to the value of the goods or services supplied to the company and comply with the market standards.
- Payments are made to bank accounts in countries where commercial partners have a registered business.
- We have strict conditions for accepting and giving gifts.





Counteracting corruption

Do's:

- ✔ Immediately report any activity that is against the anti-corruption policy.
- ✔ Make sure your business partners follow our anti-corruption policy.
- ✔ Notify your superior immediately of any gifts or hospitality you have received.



Don'ts:

- ✘ Do not promise or give items of value to representatives of public authorities, political parties, or trade unions.
- ✘ Do not accept gifts or invitations that are contrary to internal rules or the law.
- ✘ Do not use intermediaries to carry out actions that you cannot take on your own in accordance with the policy.

The full content of the policy can be found here: [link](#)



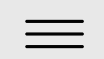
Conflicts of interest

Conflicts of interest can occur when your private activities or relationships affect the objectivity in the performance of your duties. This may include both actual and potential benefits for you or people associated with you, such as your family, people you have romantic relationships with, or friends.

Our principles:

Persons working in the Allegro Group are required to comply with the Transparency Policy, including the rules on conflicts of interest. Through joint efforts, we can conduct our business in a fair, transparent and ethical manner.





Conflicts of interest

Do's:

- ✔ Report any potential and actual conflicts of interest to your supervisor or to the Risk & Compliance department.
- ✔ Avoid any action that may lead to unacceptable conflicts of interest.
- ✔ Be transparent about actions you take that may affect your objectivity in the performance of your duties.



Don'ts:

- ✘ Do not engage in any activity competitive against the Group, or activity conducted by business partners for the benefit of Allegro, during the period of your employment relationship.
- ✘ Do not accept benefits that contradict the gift and benefits principles.
- ✘ Do not use confidential information for non-business purposes.

The full content of the policy can be found here: [link](#)

Competition and consumer protection law compliance policy

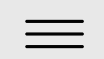
Competition and consumer protection law is crucial to maintaining a fair market, providing consumers with reliable information, and protecting their rights. The Allegro Group is committed to these principles in order to promote fair competition and protect consumers' interests. Below are the basic principles and guidelines regarding our compliance policy.

Our principles:

- **Protection of the competition mechanism:** We ensure that our actions promote fair competition.
- **Compliance with antitrust laws:** We operate in accordance with the competition and consumer law, both at the national and European level.

- **Transparency and integrity:** We ensure the transparency of our activities by providing consumers with complete and reliable information.
- **Avoidance of anti-competitive practices:** We do not engage in price fixing, market sharing, or other anti-competitive arrangements.
- **Protection of consumer interests:** We comply with regulations protecting consumers from unfair commercial practices.





Competition and consumer protection law compliance policy

Do's:

- ✔ Ensure that all promotions are real and legal.
- ✔ Report any suspected violations of competition law or consumer interests.
- ✔ Make sure that all terms of agreements with consumers are clearly defined and easy to understand.



Don'ts:

- ✘ Do not fix prices or other commercial conditions with competitors.
- ✘ Do not apply practices that may mislead consumers, such as fake promotions or hidden fees.

The full content of the policy can be found here: [link](#)

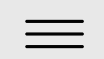


Policy on countering money laundering and financing of terrorism, and on export controls and financial sanctions

Our principles:

In the Allegro Group, we are committed to conducting business in an ethical and legal manner. Our goal is to prevent money laundering, terrorist financing, and to comply with export control and financial sanctions laws. The policy aims to protect the company from the risks of illegal activities and to ensure compliance with applicable regulations.





Policy on countering money laundering and financing of terrorism, and on export controls and financial sanctions

Do's

- ✔ Report any suspicious transactions or activities that may indicate money laundering or terrorist financing. You can do so via our whistleblowing platform.
- ✔ Participate in mandatory training on counteracting money laundering and terrorist financing, and on export control and financial sanctions.



Don'ts

- ✘ Avoid activities that may lead to money laundering, terrorist financing, or violations of export control laws.
- ✘ Do not do business with parties subject to sanctions.
- ✘ Do not disregard the obligation to report suspicious activities or participate in training.

Remember!

Remember that failure to comply with these rules can lead to serious legal consequences and damage to the company's reputation. If you have any questions or concerns, contact your superior or CSO.

The full content of the policy can be found here: [link](#)



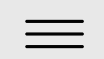
Insider dealing and market abuse policy

Our principles:

Understanding and compliance with regulations:

- The Allegro Group, its directors and employees must understand and comply with the rules prohibiting insider dealing and market abuse.
- These rules are intended to prevent the misuse of confidential information and the dissemination of false or misleading information on the market.





Insider dealing and market abuse policy

Do's:

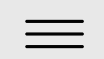
- ✔ Ensure that all confidential information is handled in accordance with the regulations in force and company's procedures.
- ✔ Regularly update your knowledge of market abuse laws and ensure that they are followed.



Don'ts:

- ✘ Do not use confidential information to trade in financial instruments.
- ✘ Do not disclose confidential information to unauthorized persons.
- ✘ Do not manipulate the market by disseminating false or misleading information.

The full content of the policy can be found here: [link](#)



Instructions on procedures for securities transactions

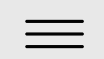
Our principles:

These instructions set out the rules for transactions in Allegro.eu securities, in accordance with the provisions of the MAR. They are intended to ensure compliance and prevent misuse of confidential information.



	Position 2	Position 3	Position 4	Position 5	Position 6
January	125,00	156,25	195,31	244,14	305,18
February	202,50	273,38	369,06	498,23	672,61
March	290,00	420,50	609,73	884,10	1281,95
April	225,00	202,50	182,25	164,03	147,62
May	435,00	630,75	914,59	1326,15	1922,92
June	437,50	546,88	683,59	854,49	1068,15
July	500,00	625,00	781,25	976,56	1220,70
August	562,50	703,13	878,91	1098,63	1373,29
September	625,00	781,25	976,56	1220,70	1525,88
October	687,50	859,38	1074,22	1342,77	1678,47
November	750,00	937,50	1171,88	1464,84	1831,05
December	812,50	1015,63	1269,53	1586,91	1983,64

	Position 1	Position 2	Position 3	Position 4	Position 5	Position 6	Position 7	Position 8	Position 9	Position 10	Position 11	Position 12
January	100,00	125,00	156,25	195,31	244,14	305,18	381,47	476,84	596,05	745,06	931,32	1164,15
February	150,00	202,50	273,38	369,06	498,23	672,61	908,02	1225,82	1532,28	1915,35	2394,18	2992,73
March	200,00	290,00	420,50	609,73	884,10	1281,95	1858,82	2695,29	3369,12	4211,40	5264,24	6580,31
April	250,00	225,00	202,50	182,25	164,03	147,62	132,86	119,57	149,47	186,83	233,54	291,93
May	300,00	435,00	630,75	914,59	1326,15	1922,92	2788,23	4042,94	5053,67	6317,09	7896,37	9870,46
June	350,00	437,50	546,88	683,59	854,49	1068,12	1335,14	1668,93	2086,16	2607,70	3259,63	4074,54
July	400,00	500,00	625,00	781,25	976,56	1220,70	1525,88	1907,35	2384,19	2980,23	3725,29	4656,61
August	450,00	562,50	703,13	878,91	1098,63	1373,29	1716,61	2145,77	2682,21	3352,76	4190,95	5238,69
September	500,00	625,00	781,25	976,56	1220,70	1525,88	1907,35	2384,19	2980,23	3725,29	4656,61	5820,77
October	550,00	687,50	859,38	1074,22	1342,77	1678,47	2098,08	2622,60	3278,26	4097,82	5122,27	6402,84
November	600,00	750,00	937,50	1171,88	1464,84	1831,05	2288,82	2861,02	3576,28	4470,35	5587,94	6984,92
December	650,00	812,50	1015,63	1269,53	1586,91	1983,64	2479,55	3099,44	3874,30	4842,88	6053,60	7567,00



Instructions on procedures for securities transactions

Do's:

- ✔ If you are a person with management responsibilities, remember to get approval for the company's securities transactions and after that report it.
- ✔ Execute transactions only in open periods that fall one month after the publication of semi-annual and annual financial statements and quarterly publication of financial results.



Don'ts:

- ✘ As a person discharging managerial responsibilities, do not make transactions without the prior consent of the company.
- ✘ Do not execute transactions during closed periods without consent, even in exceptional situations.
- ✘ Do not neglect the obligation to record and archive all requests for consent and decisions.

The full content of the policy can be found here: [link](#)



Ethics in practice:



I started dating a colleague from work, our relationship goes beyond mere friendship, it is romantic.

The Allegro Group does not interfere in the private lives of its employees. However, it would not be appropriate for people in a romantic relationship to assess each other, supervise each other's work, or decide on each other's promotion. Therefore, you should report the situation to your manager and HRBP so that they can check whether there is a potential conflict of interest and potentially reorganize the work structure to exclude it.



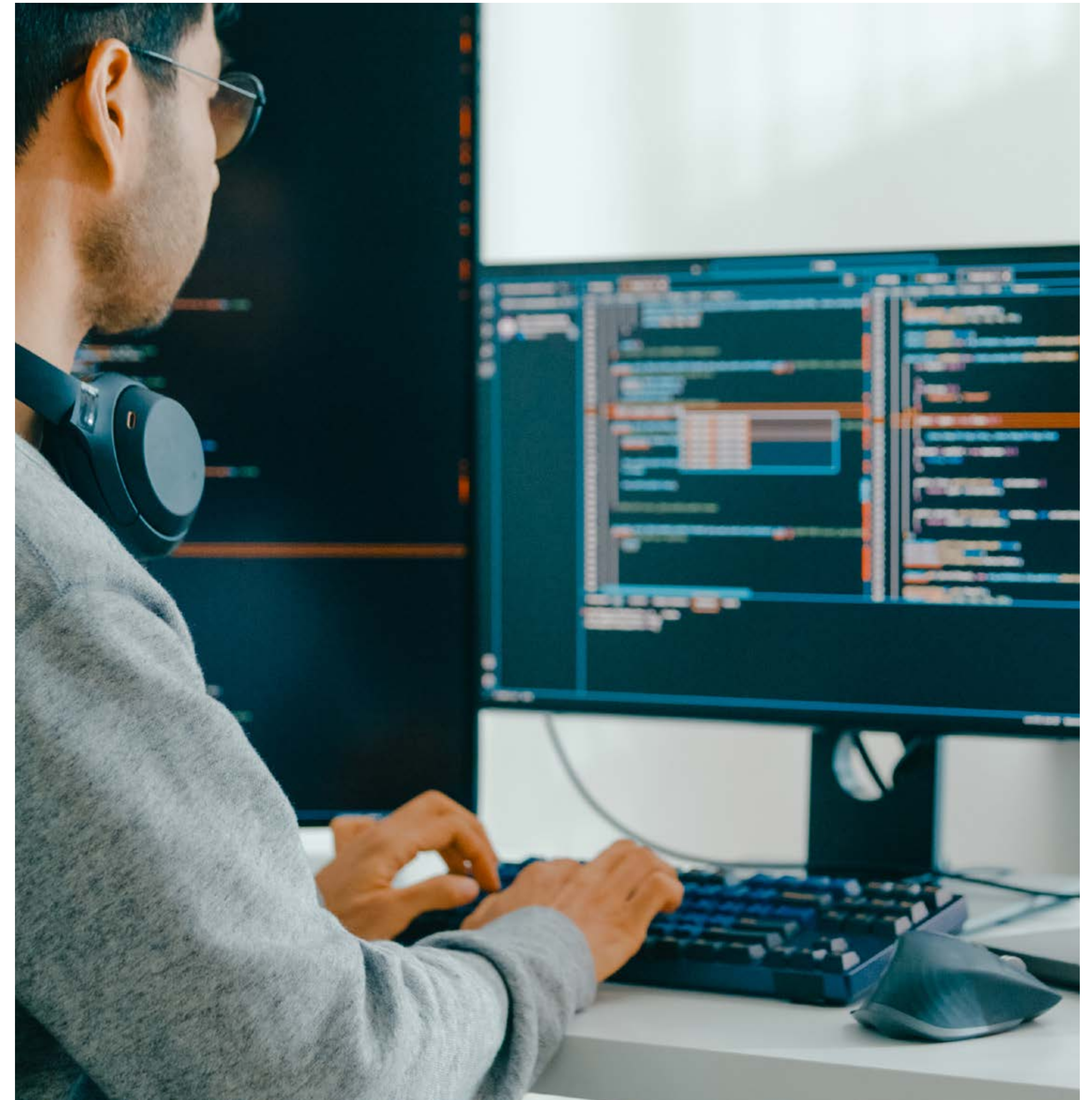


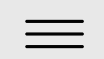
How do we care about data security?

Security policy

Our principles:

Protecting information, data and resources is a priority for us. We are committed to the highest security standards to safeguard the data of our users, employees, and colleagues. Each person associated with our company is responsible for managing data in a secure manner and in accordance with applicable laws and internal company guidelines.





Security policy

Do's:

- ✔ Always comply with applicable laws, internal policies and procedures regarding information security and data protection.
- ✔ Regularly participate in mandatory training sessions on information security and data protection to stay up to date with best practices and the latest procedures.
- ✔ Immediately report any security or data protection breaches to the appropriate departments.



Don'ts:

- ✘ Do not violate procedures, even if you think they are an inconvenience.
- ✘ Do not share information or data with people who do not have the appropriate permissions in this respect.
- ✘ Do not neglect mandatory security training or ignore the requirement to report incidents, even if they seem insignificant.

The full content of the policy can be found here: [link](#)

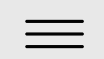


Privacy and processing of personal data

Our principles:

Personal data are a key element of the Allegro Group's operations; we work with them on a daily basis and we should take special care to use them safely and lawfully. The correctness of the processes related to personal data depends primarily on the attitude of people working in the Group and an informed approach to the principles of privacy. We use personal data for specific business purposes, projects, and tasks, because they serve us for these purposes, but remember to do this in accordance with the law and justified need, and in compliance with dedicated procedures.





Privacy and processing of personal data

Do's:

- ✔ React and immediately report personal data incidents, since a quick response often helps mitigate potential damage and problems.

- ✔ When using personal data, always answer two questions: Why do I need these personal data? (purpose of use), and Am I allowed to access these personal data? (legal grounds).

- ✔ Remember that proper processing of personal data requires compliance with the rules set out in policies and procedures; participate in training sessions to update your knowledge



Don'ts:

- ✘ Do not disregard the rules related to personal data — their violation is associated with a high risk of penalties or other sanctions being imposed on Allegro

- ✘ Do not access personal data when you are not sure that you have the need or right to do so.

- ✘ Do not mislead others, in particular do not conceal personal data events, projects, or similar activities, hoping that “nothing will happen.”

The full content of the policy can be found here: [link](#)

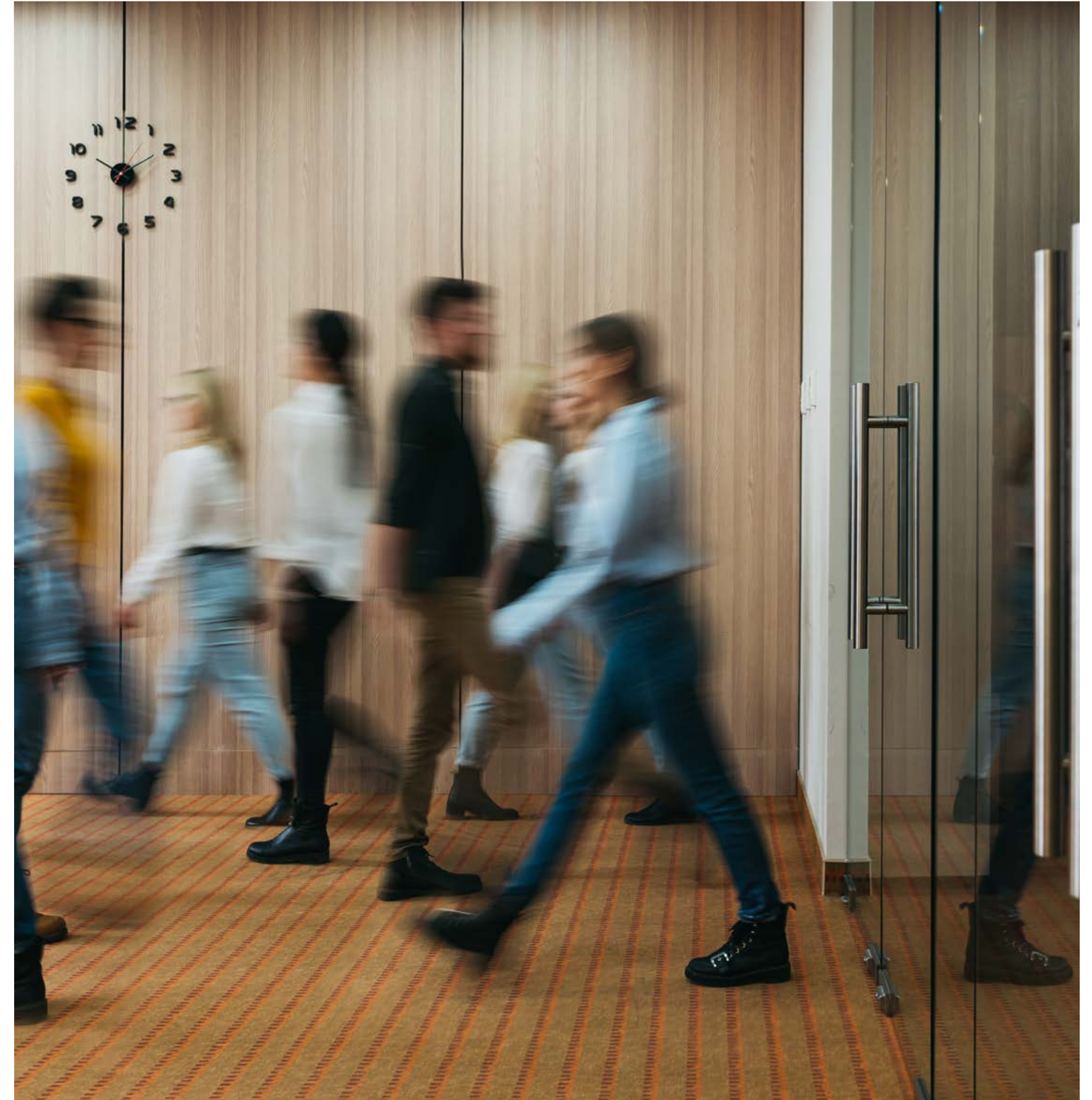
Risk management and business continuity policy

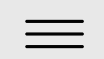
The risk management policy of the Allegro Group is designed to identify, assess, and minimize risks that may affect the achievement of our business objectives. Risk management enables informed decisions, increased operational efficiency, and protection of company resources. In Allegro, we are also aware of the importance of the availability of our services to buyers, which is why we have a comprehensive business continuity management (BCM) system.

Our principles:

- 1. Identification of risks:** Regularly identifying potential risks that may affect the company's business.
- 2. Risk analysis:** Making an assessment of the impact and likelihood of identified risks.

- 3. Monitoring and reporting:** Systematic monitoring of risks and reporting their status and effectiveness of remedial actions
- 4. Management and follow-up:** Implementation of risk mitigation measures and a follow-up on their effectiveness.
- 5. Creating Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP):** The identified key processes have Business Continuity Plans and Disaster Recovery Plans established.





Risk management and business continuity policy

Do's:

- ✔ Make sure that all risks assigned to you are up-to-date and properly classified.
- ✔ Notify the relevant persons about new threats or incidents that may affect the company's business.
- ✔ Implement established remedial actions and monitor their effectiveness.



Don'ts:

- ✘ Do not disregard the signs that may indicate the emergence of new risks.
- ✘ Do not hide information about risks.
- ✘ Avoid making decisions about risk without first analyzing its impact and probability.

The full content of the policy can be found here: [link](#)

Policy on drawing up and maintaining a list of persons having access to confidential information

Our principles:

1. Compliance with the regulations:

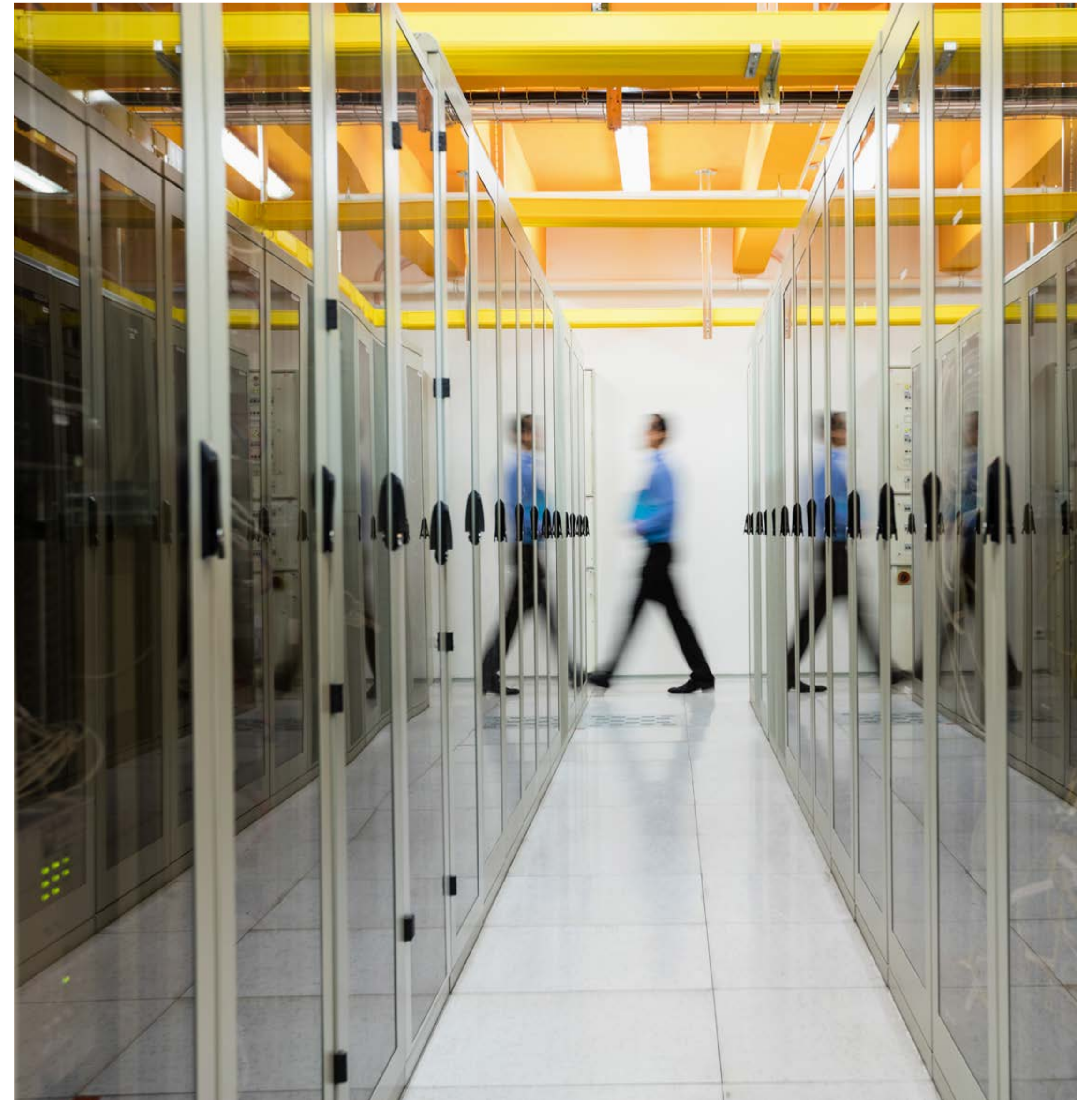
- The Allegro Group undertakes to draw up and maintain a list of persons having access to confidential information in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council (MAR) and the Luxembourg Act of December 23, 2016, on market abuse.

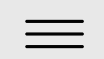
2. Transparency and accuracy:

- The list of persons having access to confidential information is kept in a transparent and accurate manner, containing all necessary identification information and access data for confidential information.

3. Regular updates:

- The list is updated on a regular basis in order to reflect the current state of affairs, including any changes in access to confidential information.





Policy on drawing up and maintaining a list of persons having access to confidential information

Do's:

- ✔ Make sure that only authorized and listed persons have access to confidential information.



Don'ts:

- ✘ Do not share confidential information with people who are not on the list, and if this happens, immediately notify the Disclosure Officer.

The full content of the policy can be found here: [link](#)



Ethics in practice:



Can I also support the Group in the area of privacy? What are my responsibilities and can I get involved?

Of course you can. Regularly participate in periodic privacy training sessions and report any irregularities in the processing of personal data. Also, be sure to work systematically with the data protection team to ensure compliance with the regulations of your project.

