

Good practices in green / sustainability / ESG / CSR marketing and communication at Allegro

1. Objective - why we are introducing good communication practices

Allegro prioritises sustainability and measures to reduce its environmental impact. To address the increasing communication around our environmental impact, we have developed a set of good practices and rules of presenting environmental issues in external communication to help formulate correct and truthful messages.

This document outlines the rules of environmental and green / eco / sustainability / CSR communication and is primarily addressed to creators of such messages, including PR, CSR/ESG, employer branding, Marketing and Communication employees, Allegro Life members and creators of external presentations and speeches. The rules should be followed by everyone preparing environmental-related content and graphics concerning Allegro, including third-party suppliers, companies and agencies providing services for Allegro.

The document takes into account applicable regulations and recommendations on communicating environmental issues¹.

The aim of the document is to provide transparent and reliable communication based on facts and as well as easy to understand for end consumers.

2. Communication rules

To make the good communication practices easier to understand, we have prepared the following rules for communication creators:

- **1.** Base your message on facts and reality.
- 2. Create clear, reliable and understandable messages. Do not use shorthand phrases.
- **3.** Avoid using adjectives without referring to metrics or statistics and unreal comparisons which we cannot substantiate based on any specific source, specific data or information confirmed by public institutions or international organisations (see the examples below).
- **4.** Do not provide communication with photos or graphics that do not reflect reality.
- **5.** Carefully select graphics / backgrounds for the messages used, particularly when using images (depicting e.g. trees, forests, water animals) and colours (e.g. blue or green background or text) that are associated with environmental sustainability.
- **6.** Choose the form and channels of communication according to the project scale / effect (e.g. a minor implementation in a single location / a single product should not be communicated as a distinguishing characteristic of Allegro One. If the environmental benefits are associated with a single aspect / fragment of a service or product, the claim must clearly indicate the limited

¹ Draft Directive of the European Parliament and of the Council amending Directive 2005/29/EC [on unfair commercial practices] and 2011/83/EU [on consumer rights] as regards empowering consumers for the green transition through better protection against unfair practices and better information (COM(2022) 143 final, 30.03.2022); the European Commission Guidance on the interpretation and application of Directive of the European Parliament and of the Council amending Directive 2005/29/EC concerning unfair business-to-consumer commercial practices in the internal market (in particular 4.1.1 "Environmental claims").



scope (e.g. we reduce *last-mile* carbon emissions; we use recycled materials *for APM casings*, etc.)

- **7.** Do not use blacklisted terms due to their ambiguity, context and legal consequences, e.g. "eco" and "ecological", in marketing messages.
- **8.** Carefully explain to consumers the messages regarding specific commitments (e.g. in FAQ, on the website, in press releases). The explanation for the claim should be accessible from where the claim appears (e.g. as a URL, tooltip, etc.)
- **9.** When in doubt, consult your messages with the PR and ESG team via email at prasa@allegro.pl.

The above rules were prepared on the rules drawn up by the Board of Advertising Ethics on the ethical communication and advertising of responsibility for the environment and sustainability, as well as the EC Guidance: Environmental claims are likely to be misleading if they consist of vague and general statements of environmental benefits without appropriate substantiation of the benefit and without indication of the relevant aspect of the product the claim refers to².

3. Final Provisions

Employees and associates are required to read and comply with this Policy.

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Full version of the policy is an internal information, not publicly disclosed.

² Examples of such claims are 'environmentally friendly', 'eco-friendly', 'eco', 'green', 'nature's friend', 'ecological', 'environmentally correct', 'climate friendly', 'gentle on the environment', 'pollutant free', 'biodegradable', 'zero emissions', 'carbon friendly', 'reduced CO2 emissions', 'carbon neutral', 'climate neutral' and even the broader claims of 'conscious' and 'responsible'.