

allegro

# Code of Ethical Conduct



# Table of contents

<b>Introduction: Code of Ethical Conduct — what is it and who is it for?</b>	<b>03</b>
<b>Culture of responsiveness, whistleblowing procedure</b>	<b>04</b>
How to report concerns?	05
<b>What kind of workplace do we create?</b>	<b>07</b>
Occupational health and safety	08
Human rights policy	10
Diversity policy	12
Prevention of undesirable phenomena, including discrimination, harassment, and mobbing	14
<b>How do we conduct business sustainably?</b>	<b>17</b>
Climate and environmental policy, and circularity and waste policy	17
How do we communicate about sustainability?	19
Responsible marketing and communication	20
Charitable, Social and Sponsorship Policy	22

<b>How do we ensure ethical standards in business?</b>	<b>25</b>
Counteracting corruption	25
Conflicts of interest	27
Competition and consumer protection law compliance policy	29
Policy on countering money laundering and financing of terrorism and on export controls and financial sanctions	31
Insider dealing and market abuse policy	33
Instructions on procedures for securities transactions	35
<b>How do we take care of data security?</b>	<b>38</b>
Security policy	38
Privacy and processing of personal data	40
Risk management and business continuity policy	42
Policy on drawing up and maintaining a list of persons having access to confidential information	44
Artificial intelligence (AI) policy	47



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

The Allegro Group Code of Ethical Conduct („Code”) is a set of basic ethical principles to be adhered to by all companies of the Allegro Group („Group”), i.e., all companies owned directly or indirectly by Allegro.eu, and persons working in them on the basis of employment contracts or cooperating on the basis of civil law contracts (including as part of their business), or through temporary employment agencies (jointly referred to as „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 the foundation 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.

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

We want all Allegro Group Associates to know and follow the Code, and to this end we will organize regular, mandatory training sessions in order to disseminate it. If you have any questions about the Code, you can contact the person responsible for operational supervision of the Code at [compliance@allegro.com](mailto:compliance@allegro.com).





## Culture of responsiveness, whistleblowing procedure

An important element of ethical business is the culture of responding to behaviors that are contrary to the law, the Code, company policy, 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 in the workplace or in the context of Allegro Group business to react – by intervening, reporting them to managers and using company procedures. Rapid 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 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 your own or report them to the manager, so we offer a few simple and safe ways to ensure complete confidentiality:



**Talk to the Compliance Manager:** If you have any doubts about compliance with the law, the Code, and company policies in connection with running a business or data protection, arrange a meeting with the Compliance Manager ([compliance-manager@allegro.com](mailto:compliance-manager@allegro.com)).



**Talk to the Employee Relations Manager (ERM):** Not sure what to think about the situation you find yourself in or witnessed in the workplace in the context of relations between people working in the Allegro Group? Are you experiencing an ethical dilemma in employee matters? Contact the ERM ([erm@allegro.com](mailto: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, but in a way which allows communication with the whistleblower.



**By email:** You can send your report to [whistleblowing@allegro.com](mailto: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 explain 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 foster an ethical, inclusive, and safe working environment where everyone is respected, treated with dignity, and feels safe, supported, and can freely grow and learn from mistakes. We recognize respect, integrity, kindness, and a culture of communication as the basis of the relationships between people working in the Group, regardless of their characteristics, views, professional status, or the nature of their relationships.

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 neglect safety rules even in „emergency situations.”

## Human rights policy

### Our principles:

#### 1. Respect for human rights:

- 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 in accordance with our 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 in your surroundings.
- ✘ 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 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 the Board of Directors.
- We adapt workplaces to the needs of people with disabilities and special needs.





## Diversity policy

### Do's:

- ✔ Treat all 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 harassment 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 a 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 treating all employment candidates in the Group equally. Contact the person responsible for the recruitment process and ask them to justify any 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 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 the 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 take care of responsible communication and marketing regarding the subject of sustainable development, in accordance with the guidelines of the [Responsible Marketing and Communication Policy](#).



## How do we conduct business sustainably?

### Do's:

- ✔ By proactively designing solutions and products, support the goals of minimizing the carbon footprint and promoting the circular use of resources.
- ✔ Carefully check the reliability of information about the declared pro-environmental effects of products or services to avoid greenwashing.
- ✔ Engage in initiatives that promote sustainability and climate education by applying the 10 principles of responsible marketing and communication.



### Don'ts:

- ✘ Avoid making general claims without specific evidence. Do not present any activities that do not have proven real environmental significance as „ecological/ green.”
- ✘ 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](#)



## How do we communicate about sustainability?

In response to the growing interest in environmental communication, the Allegro Group has developed a set of rules for the presentation of ESG topics in external and internal communication. The aim of the company is to ensure that all relevant entities within the Allegro Group, as well as their business partners involved in such communication, develop reliable, transparent, and trustworthy marketing communications. The Allegro Group seeks to provide communication in line with its mission and brand identity which meet high quality standards, are truthful and not misleading, while promoting continuous improvement in communicating our environmental activities.





## Responsible marketing and communication

The Allegro Group is guided by 10 principles of marketing and communication based on regulations and best market practices.

1. Avoiding **UNFAIR** commercial practices that violate the principles of social responsibility.
2. Avoiding **GENERAL CLAIMS** without specific evidence.
3. Basing environmental communication on **FACTS AND DATA**.
4. **DIFFERENTIATING** between product-/activity-specific communications and company-level communications.
5. Avoid promoting **IRRELEVANT** benefits.
6. Use **CLEAR** and understandable language.
7. Use only **RELIABLE** sustainability labels.
8. Make sure the visual materials are **ACCURATE**

- and reflect reality.
9. Communicate **CONDITIONS AND LIMITATIONS** clearly.
10. Use **CONSISTENT** and clear comparative methods.





## Responsible marketing and communication

### Do's:

- ✔ Check objectivity: Make sure that all claims about environmental/social characteristics or the circular economy (e.g., durability, repairability, recyclability) are objective, measurable, and supported by verifiable evidence.

---

- ✔ Be specific: Clearly communicate any conditions, compromises, or limitations associated with sustainability claims.

---

- ✔ Use accurate data: If possible, all statements should be based on recognized standards or certificates issued by independent entities.

---




### Don'ts:

- ✘ Avoid vague claims: Do not use generic terms such as „ecological,” „environmentally friendly,” or „sustainable” without providing concrete evidence of significant environmental impacts.

---

- ✘ Prevent visual misinterpretation: Avoid using images or graphics (e.g., leaves, Earth icons, etc.) that create unjustified associations with environmental performance or mislead the consumer as to the actual carbon footprint of the product.

---

- ✘ Avoid overstatements: Do not use a positive message concerning the entire company or category if the benefit is only for one specific product or initiative.

---

If you plan to communicate on sustainability, environmental or social issues (in narrative or visual form), consult relevant internal experts (e.g., antitrust, PR, ESG, CSR, legal, compliance) via the designated contact address [prasa@allegro.com](mailto:prasa@allegro.com).

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



## Charitable, Social and Sponsorship 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 workforce 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 Policy

### Do's:

- ✔ Support charitable and social initiatives in line with 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](mailto: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 employers' 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, 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 greenwashing.



# How do we ensure ethical standards in business?

## Counteracting corruption

The Allegro Group has a zero tolerance policy towards 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 towards 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 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 of 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 Compliance department.
- ✔ Avoid any action that may lead to unacceptable conflicts of interest.
- ✔ Be transparent about any actions that may affect your objectivity in your official duties.



### Don'ts:

- ✘ Do not engage in any activity competitive against the Group, or that is 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.



### Czego nie należy robić:

- ✘ 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 sanction 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 use 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 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 the company 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.



## Instructions on procedures for securities transactions

### Do's:

- ✔ Be sure to obtain approval for the company's securities transactions, especially if you are a person discharging managerial responsibilities.
- ✔ 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 female 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 possibly reorganize the work to exclude it.



# How do we take care of 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:

- ✔ Comply with laws and policies — always comply with applicable laws, internal policies and procedures regarding information security and data protection.
- ✔ Participate in training sessions — regularly participate in mandatory training sessions on information security and data protection to stay up to date with best practices and the latest procedures.
- ✔ Report incidents — immediately report any security or data protection breaches to the appropriate departments.



### Don'ts:

- ✘ Do not violate procedures — always follow applicable safety procedures and processes, even if you think they are inconvenient.
- ✘ Do not share data without permission — do not share information or data with people who do not have the appropriate permissions in this respect.
- ✘ Do not neglect training and reporting — 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 Allegro Group 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 to 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 use 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 imposing penalties or other sanctions on Allegro.
- ✘ Do not use 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 Allegro Group risk management policy 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. Risk identification:** Regularly identifying potential risks that may affect company business.
- 2. Risk analysis:** 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 following-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:

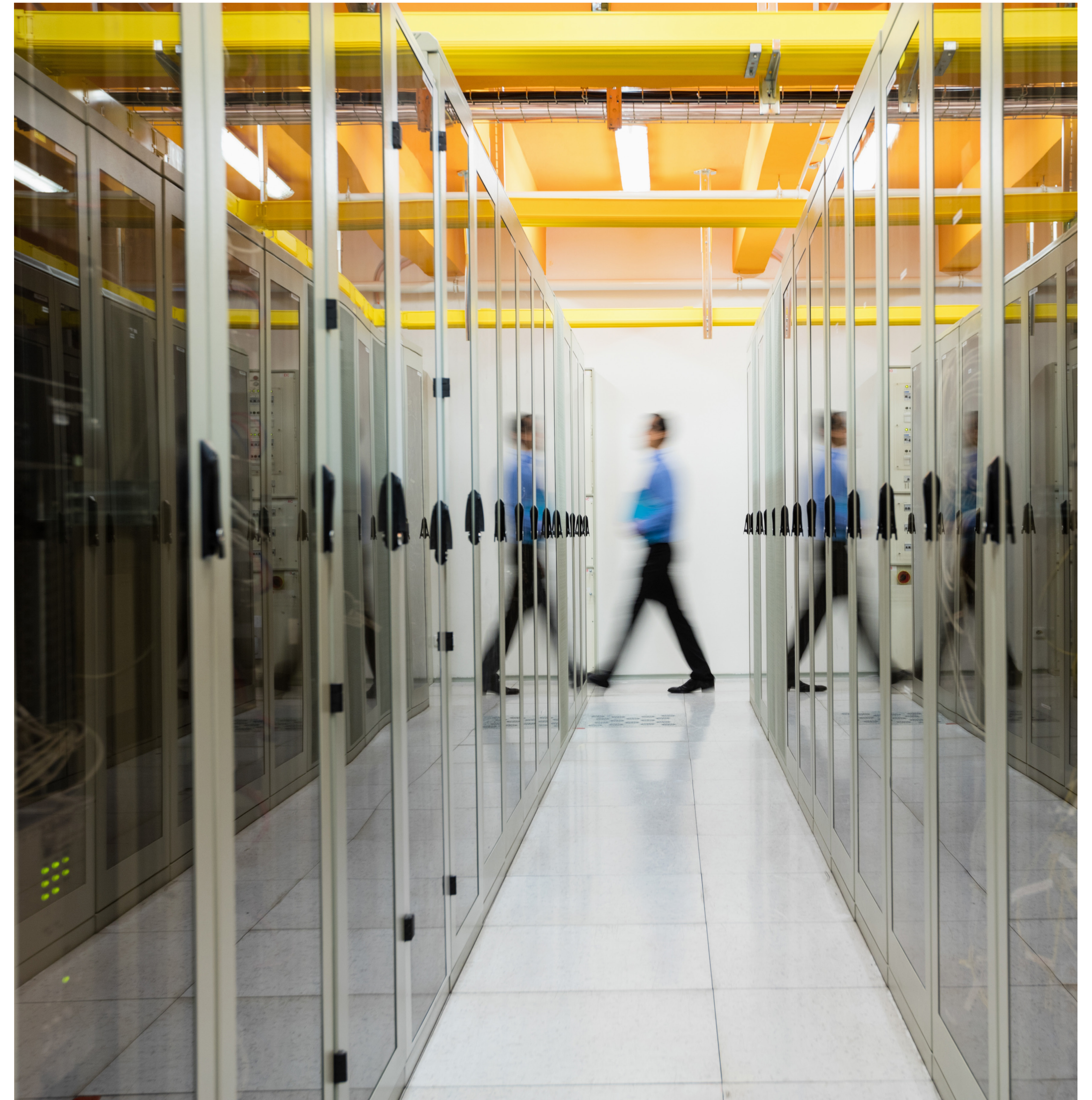
- The Allegro Group undertakes to draw up and maintain a list of persons having access to confidential information in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council (MAR) and the Luxembourg Act of December 23, 2016, on market abuse.

#### 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 at [do@allegro.eu](mailto:do@allegro.eu).

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 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.

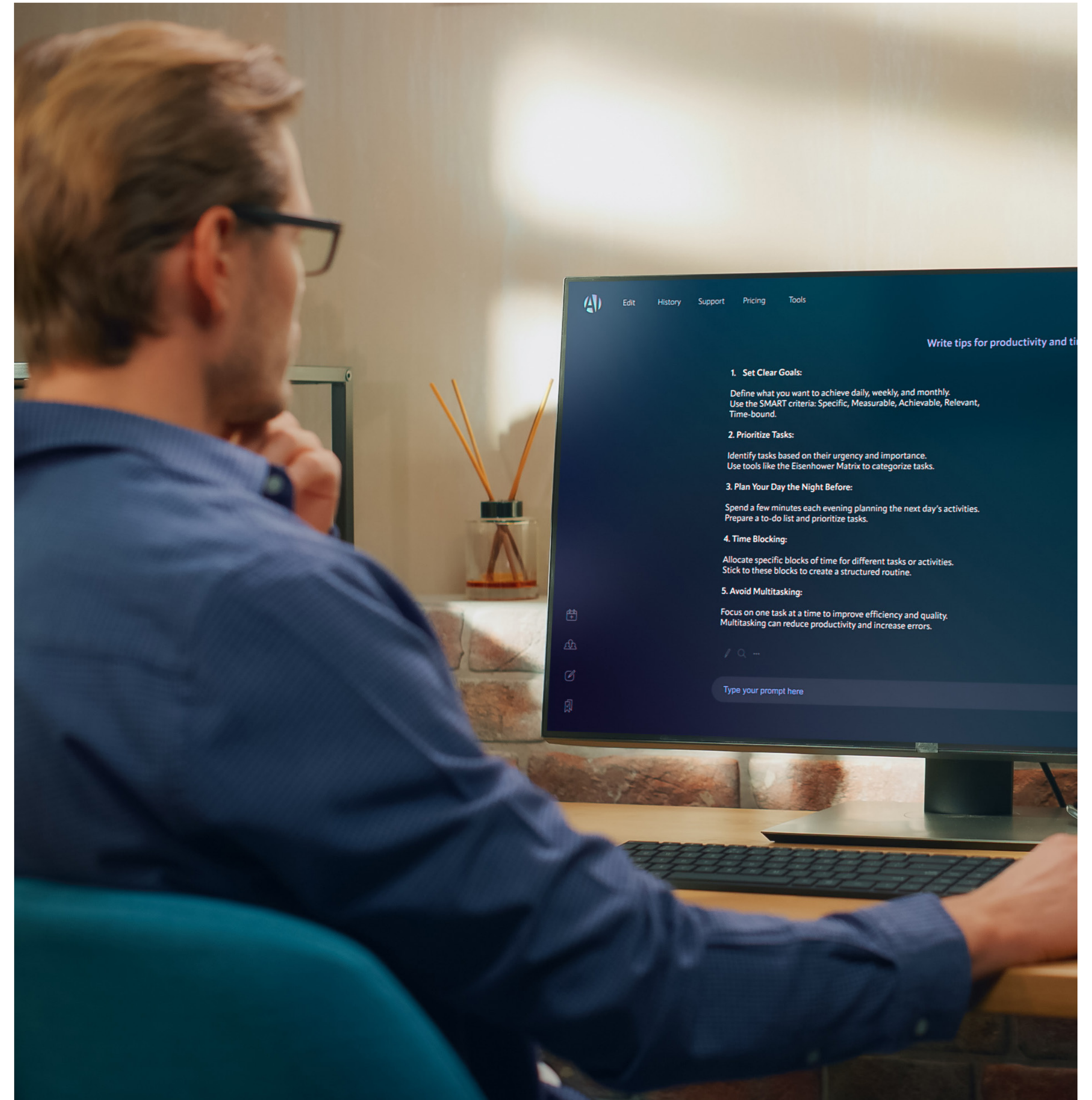




## Artificial intelligence (AI) policy

### Our principles:

We are committed to the safe and responsible use of AI systems in accordance with the law, minimizing risks and protecting data, privacy, and human dignity. AI systems are regularly monitored for safety and proper operation. We also provide transparency by informing users about interactions with AI and explaining decision-making processes where possible.





## Artificial intelligence (AI) policy

### Do's:

- ✔ Verify AI output — keep in mind that AI makes mistakes or provides misleading information, so always review its output and ensure human participation if necessary before further use.
- ✔ Use the required disclaimers — if the tool interacts with users, make sure that it contains a clear indication that it is based on artificial intelligence (e.g., „suggested response generated by artificial intelligence“). The same applies to generated content, such as images.
- ✔ Report incidents — if you notice or suspect an AI incident (e.g., a failure, security breach), immediately report it to the information security team.



### Don'ts:

- ✘ Automation should not be blindly trusted — do not treat the artificial intelligence output as final without human verification.
- ✘ Do not enter prohibited content — in AI systems, you should not process content that is illegal or to which you do not have the appropriate rights.
- ✘ Do not ignore the risks — do not decide to implement or use an AI system without first identifying and assessing the risks in accordance with internal procedures.
- ✘ Do not modify models without authorization — do not attempt to gain unauthorized access to, copy, or modify AI models and training data.

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

## Ethics in practice



As part of my work, I have to prepare a summary of a long report. I want to use an internal AI-based tool to generate the summary. Can I send the output text directly to my supervisor as a ready document?

No. While you can use an AI tool to improve your work, it is your responsibility to verify the output. Artificial intelligence can make mistakes or ignore key contexts. You are responsible for the verification of the output and any errors in the submitted report. In addition, make sure that you use the tool according to the instructions and do not enter data that should not be processed in this way.

