



Atlantic Grupa d.d. - COMPLIANCE QUESTIONNAIRE FOR ISSUERS OF SHARES for 2025

Code chapter	No.	Question	Answer	Explanation	Link
1. Leadership/ Cooperation	1	The company's articles of association and/or other internal regulations set out clearly the authorities of the supervisory and management boards in accordance with the relevant legislation and the arrangements by which the two boards cooperate?	YES		
	2	The company's articles of association (and/or other internal regulations) are freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/2467d9b63c22e32cb0d58ff35445ea08/ARTICLES_OF_ASSOCIATION_OF_ATLANTIC_GRUPA_D.D.pdf
	3	The supervisory board adopted a decision setting out the categories of decisions and legal transactions that require the supervisory board's prior approval and those decisions regarding which the management board is required to consult with the supervisory board before making a decision?	YES		
	4	The summary of the decision is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	5	The company's articles of association and/or internal regulations provide for the supervisory board's prior approval when making major decisions	NO	Responsibilities of the Supervisory Board are set within the framework of the valid Companies Act.	

		that affect the company's strategy, expenditure, risk exposure and reputation?			
	6	The company's articles of association and/or internal regulations stipulate that the supervisory board and its committees have timely access to documents, premises, senior management and employees when necessary for the performance of their duties?	YES		
	7	The management board reported to the supervisory board at regular intervals on the company's operating performance, financial situation, major financial and other risks, its resilience and the results of its engagements with shareholders and other stakeholders?	YES		
	8	The management and supervisory boards agreed on the content, format and frequency of these reports?	YES		
	9	The articles of association and/or internal regulations stipulate that the president of the management board must notify the supervisory board if an event occurs or seems likely to occur that has the potential to affect the company's performance, financial position or reputation?	YES		
1. Leadership/Rules of conduct	10	The supervisory board approved the code of conduct (or other internal regulation) that establishes the rules of conduct to be followed by members of the management and supervisory boards, employees and others acting on behalf of the company?	YES		
	11	The code of conduct (or other internal regulation) contains provisions that ensure an inclusive work environment, equal opportunities for different genders and the prohibition of any form of YES discrimination, as well as the rules of conduct and measures to be taken if they are breached?	YES		

	12	The code of conduct (or other internal regulation) is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP.pdf
	13	The supervisory board oversees the implementation and monitors the effectiveness of the code of conduct (or other internal regulation)?	YES		
	14	The code of conduct (and/or other internal regulation) takes into account recommendations on responsible business conduct as set out in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the applicable implementing OECD Due Diligence Guidance for Responsible Business Conduct?	YES		
2. Duties of board members/Conflict of interest	15	Members of the management and supervisory boards are prohibited from participating in decision-making where they have a conflict of interest?	YES		
	16	The company adopted a policy for managing conflicts of interest?	YES		
	17	The supervisory board gave prior approval to the policy for managing conflicts of interest?	YES		
	18	The policy for managing conflicts of interest is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP.pdf

	19	Members of the supervisory board are obliged to inform the entire supervisory board that they are in an existing or potential conflict of interest?	YES		
	20	Members of the management board are obliged to inform the president of the supervisory board and other members of the management board of an existing or potential conflict of interest?	YES		
	21	The supervisory board is obliged to keep a record of all notifications relating to an existing or potential conflict of interest, including the description of the actions taken and the outcome of the actions taken as regards any existing or potential conflict of interest?	YES		
	22	Members of the management and supervisory boards have an obligation to inform the president of the supervisory board if they consider that another member of the management or supervisory boards has not declared an existing or potential conflict of interest, or to inform the deputy president of the supervisory board if it concerns the president of the supervisory board?	YES		
2. Duties of board members/Competition ban	23	Members of the supervisory and management boards do not engage in activities that compete with the company's business, either on their own or another's behalf?	YES		
	24	Members of the supervisory and management boards are not members of the management or supervisory boards of companies which engage in activities that compete with the company's business?	YES		
	25	Members of the supervisory and management boards do not own significant holdings in companies that compete with the company's business?	YES		
	26	Members of the management and supervisory boards who own holdings in companies with which	NO	Members of the Management Board and the Supervisory Board informed	

		the company is in competition have informed the company secretary of such holdings?		the Company Secretary that they do not hold such holdings.	
	27	Details about the holdings owned by the supervisory and management boards in companies that compete with the company's business are freely available on the company's website?	NO	Members of the Management Board and the Supervisory Board do not hold such holdings.	
2. Duties of board members/Related party transactions	28	No transactions involving members of the management or supervisory boards and the company (or persons related to either party) can be made without prior approval of the supervisory board?	YES		
	29	The fair value of each material transaction, as defined by law, must be confirmed by an independent expert prior to any such transaction?	YES		
	30	An independent expert's report on the fair value of each material transaction must be made freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP.pdf
	31	If the supervisory board appointed a special committee in accordance with the law or authorised the audit committee to decide on prior approval for entering into related party transactions, the members of such committee meet the independence requirements prescribed for members of the supervisory board?	YES		
	32	If the supervisory board appointed a special committee in accordance with the law or authorised the audit committee to decide on prior approval for entering into related party transactions, the members of such committee are independent of persons and transactions subject to the prior approval?	YES		

	33	The company adopted procedures for the approval and disclosure of transactions between members of the management or supervisory boards and the company (or persons related to either party)?	YES		
	34	The audit committee reviews the effectiveness of these procedures once a year?	YES		
	35	The company publishes information on its website without delay regarding related party transactions that require prior approval of the supervisory board, for transactions of the company and for transactions of subsidiaries with related parties of the parent company?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf
	36	The notice of a related party transaction contains at least information on the nature of the relationship with the related party, the names of the related parties, and the date and value of the transaction?	YES		
	37	Such transaction notice is available to the public for at least five years on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf
	38	The management board prepares a report on related party transactions once a year, with the content as prescribed by the Companies Act?	YES		https://flare.shape404.agency/atlantic/documents/2c34e1b6c0ad03b8278b63ad7ca62cdc/Atlantic_Grupa_d.d._-_Related_Party_Report_2025.pdf
	39	The auditor audited the report on related party transactions and submitted the signed report to the management board of the company?	YES		
	40	The supervisory board examined the report on related party transactions, took a position on the	YES		https://flare.shape404.agency/atlantic/documents/3c516f535407ff3ce7c0

		audit results, and informed the general meeting thereof in its report submitted to the general meeting?			39f871d341f2/REPORT_ON_THE_SUPERVISION_OF_BUSINESS_ACTIVITIES_FOR_2025_.pdf
3. Appointment of board members/Role of the supervisory board	41	The supervisory board is responsible for appointing and dismissing members of the management board and for recommending candidates for members of the supervisory board to the general meeting?	YES		
	42	The supervisory board adopted formal and transparent procedures for appointments to both management and supervisory boards and for the selection of senior management?	YES		
	43	The supervisory board adopted a succession plan?	YES		
	44	Procedures for appointment to the management and supervisory boards and for the selection of senior management contain objective criteria for appointment or selection, giving priority under the same conditions to the underrepresented gender?	YES		
	45	A prior assessment of the impact on gender equality of the procedures for appointment to the management and supervisory boards, the selection of senior management, and the succession plan was carried out?	YES		
	46	A prior assessment of the impact on gender equality of the procedures for appointment to the management and supervisory boards, the selection of senior management, and the succession plan was published free of charge on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA_.pdf
	47	The representation of at least 40% of members of the underrepresented gender on the supervisory board or on the supervisory and management boards together was ensured?	YES		

	48	If the representation of at least 40% of members of the underrepresented gender was not achieved, the company took measures to achieve the prescribed representation and adopted a plan and a deadline for achievement that may not exceed two years from the occurrence of the gender imbalance?	NO	Representation of at least 40% of members of the underrepresented gender has been achieved.	
	49	All measures taken by the company, the plan and the deadline for achieving the prescribed representation of the underrepresented gender, together with an explanation as to why the percentage was not achieved, are published in the company's annual report?	NO	Representation of at least 40% of members of the underrepresented gender has been achieved.	
3. Appointment of board members/Role of the nomination committee	50	The nomination committee oversees the appointment process for the supervisory and management boards to ensure that it is fair, transparent and non-discriminatory, that it promotes diversity, inclusiveness and equal opportunities, and that it manages to achieve a balanced representation of both genders?	YES		
	51	The nomination committee developed role and candidate descriptions for each vacancy consistent with the profile of the management or supervisory boards, as well as identified and recommended suitable candidates to the supervisory board?	YES		
	52	When seeking independent members of the supervisory board, the nomination committee confirmed that the candidates are independent and determined the independence criteria (as defined in Appendix A)?	YES		
	53	The nomination committee drew up a succession plan for the reappointment or replacement of members of the supervisory and management boards in consultation with the president of the relevant board?	YES		

	54	The nomination committee monitored progress in achieving the target percentage of female members on the supervisory and management boards and in senior management?	YES		
	55	The nomination committee monitored the policy of the management board on the selection and appointment of senior management?	YES		
	56	The nomination committee monitored the internal evaluation and the survey on workers' perceptions of gender equality and equal opportunities in the company?	YES		
3. Appointment of board members/Election of supervisory board members by the general meeting	57	When proposing candidates for the supervisory board to the general meeting, the company includes all information from Article 19 of the Code in the general meeting materials and makes it available free of charge on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/events/
	58	The proposal for the election of members of the supervisory board must also include, for each proposed member, information on whether they are independent within the meaning of the provisions of Article 255, paragraph 6 of the Companies Act, or why the supervisory board considers the candidate to be independent and on the basis of which criteria from the Companies Act/Code?	YES		https://www.atlanticgrupa.com/en/investors/events/
	59	In case of nomination of a current supervisory board member, the materials for the general meeting also include all information from Article 20 of the Code?	YES		https://www.atlanticgrupa.com/en/investors/events/
	60	The information from Articles 19 and 20 of the Code is freely available on the company's website also in cases when appointing workforce representatives or other supervisory board members not elected by shareholders at the general meeting?	YES		https://www.atlanticgrupa.com/en/investors/events/
4. Supervisory board and its	61	The tasks of the supervisory board include: appointing and dismissing members of the	YES		

committees/Responsibilities of the supervisory board		management board and ensuring succession planning; contributing to the development of, and approving the company's strategy, business plan and budget; and monitoring the management board's performance in achieving its objectives and the manner in which it carries out its duties, including how it engages with shareholders and other stakeholders?			
	62	The tasks of the supervisory board also include ensuring at least 40% of the underrepresented gender on the supervisory board or on the supervisory and management boards together?	YES		
4. Supervisory board and its committees/Composition of the supervisory board	63	The supervisory board developed a supervisory board profile which specifies the minimum number of members and the combination of age, gender, skills, knowledge and education, as well as professional and practical experience that is required in the supervisory board?	YES		
	64	The supervisory board includes members with different genders, ages, backgrounds and experience to ensure different perspectives in decision-making and the balanced representation of both genders?	YES		
	65	The majority of all supervisory board members are independent in accordance with the definition in Appendix A of the Code?	YES		
	66	Either president or deputy president of the supervisory board are independent?	YES		
	67	If the majority of supervisory board members are not independent, the supervisory board adopted measures, a plan, and a deadline for achieving independence that may not exceed two years from the date on which the majority of supervisory board members were not independent?	YES		

	68	All the measures taken by the company to achieve supervisory board independence, the plan and the deadline for achieving independence, together with an explanation as to why the independence has not been achieved, are published in the company's annual report?	YES		https://flare.shape404.agency/atlantia/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
4. Supervisory board and its committees/President	69	The president of the supervisory board has the tasks specified in Article 26 of the Code?	YES		
4. Supervisory board and its committees/Supervisory board committees	70	The supervisory board established a nomination committee?	YES		
	71	The supervisory board established a remuneration committee?	YES		
	72	The supervisory board established an audit committee?	YES		
	73	The supervisory board stipulated the mandate and activities of each committee?	YES		
	74	Each supervisory board committee consists of members who have the necessary skills, knowledge and education, as well as professional and practical experience to carry out the functions of that committee effectively?	YES		
	75	Each supervisory board committee has at least three members?	YES		
	76	The majority of the members of each committee are independent in accordance with the definition in Appendix A of the Code?	YES		
	77	Members of the management board are prohibited from being members of supervisory board committees?	YES		

	78	The independence of supervisory board committees was ensured through independent supervisory board members?	YES		
	79	The terms of reference of each supervisory board committee are freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP.pdf
	80	The company includes a report on the work of each supervisory board committee in the annual report, including information on the number of meetings held, the committee members, and the independence of each committee member?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
4. Supervisory board and its committees/Time commitment	81	The minimum expected time commitment of each supervisory board member was specified on their appointment?	YES		
	82	In the annual report, the company published a record of each supervisory board member's attendance at the meetings of the supervisory board and its committees?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	83	The company's articles of association and/or internal regulations provide for the obligation of supervisory board members to inform the company secretary of their membership on the supervisory or management boards of other companies?	YES		
4. Supervisory board and its committees/Frequency and format of meetings	84	Supervisory board meetings are held at least every three months?	YES		

	85	The supervisory board adopted a work plan that includes the timing and agenda of future meetings?	YES		
	86	Supervisory board committees meet as often as necessary to discharge their responsibilities effectively, and regularly report to the supervisory board on their activities?	YES		
	87	Supervisory board meetings may be held without the presence of management board members when the supervisory board considers it appropriate?	YES		
	88	Members of the management board are not present at meetings where the supervisory board discusses the performance and remuneration of the management board and its members?	YES		
	89	Persons who are not members of supervisory board committees may participate in committee meetings only at the invitation of the committee?	YES		
4. Supervisory board and its committees/Support	90	The company designated an individual to perform the activities of a company secretary?	YES		
	91	According to the articles of association (or other internal regulations), the company secretary is responsible for ensuring that the supervisory board complies with its procedures, advising the supervisory board on governance matters, supporting the president of the supervisory board and helping the supervisory board and its committees?	YES		
4. Supervisory board and its committees/Quality and timeliness of information	92	All materials required for a meeting of the supervisory board or a supervisory board committee are provided to all its members at least one week before the meeting?	YES		
	93	Supervisory board meeting minutes are made available to all supervisory board members?	YES		

	94	The minutes of supervisory board meetings contain information on the voting results, including details of how individual members voted?	YES		
	95	The supervisory board is entitled to receive information/advice from parties outside of the company at the company's expense if the supervisory board considers it necessary to carry out its duties effectively, and the procedure for doing so is specified in internal regulations adopted by the management board with prior approval by the supervisory board?	YES		
4. Supervisory board and its committees/Training and development	96	All supervisory board members received induction training into their role on appointment?	YES		
	97	All supervisory board members undergo ongoing training and education to further develop and improve their skills and knowledge?	YES		
	98	The ongoing training of supervisory board members covers the topics of business sustainability, responsible business conduct and achieving a balanced representation of both genders on the supervisory and management boards and in senior management?	YES		
	99	Supervisory board members receive regular updates and briefings from the management board and experts on matters relevant to the company and to their duties as supervisory board members?	YES		
4. Supervisory board and its committees/Supervisory board evaluation	100	The supervisory board evaluated its effectiveness and composition in the past twelve months?	YES		
	101	The supervisory board evaluated the effectiveness and composition of its committees in the past twelve months?	YES		

	102	The supervisory board evaluated the individual performance of its members and the members of its committees in the past twelve months?	YES		
	103	The evaluation was led by the president or by the deputy president of the supervisory board if the president is not independent?	YES		
	104	The evaluation of the supervisory board and its committees included an assessment of all the circumstances from Article 43 of the Code?	YES		
	105	The evaluation of the supervisory board and its committees identifies whether there is a need for improvements in the operation and preparation of their meetings?	YES		
	106	The annual report includes a report on the evaluation of the supervisory board and its committees?	YES		https://flare.shape404.agency/atlantisc/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	107	The report on the evaluation of the supervisory board and its committees includes how the evaluation was carried out, whether external assessors were employed and who was consulted during the process, as well as a summary of the actions taken or to be taken as a result of the evaluation?	YES		
5. Management board/Responsibilities of the management board	108	The management board has the responsibilities specified in Article 45 of the Code?	YES		
	109	The management board set the percentage of the underrepresented gender in senior management as a target to be achieved in the next five years?	YES		

	110	The set percentage of representation of the underrepresented gender in senior management, together with an explanation of why it was selected, why the percentage was not achieved, if applicable, the measures the company is taking to achieve it, the plan and deadline for achievement, which may not exceed five years, and the progress achieved against the plan were published in the annual report?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	111	The management board adopted the rules of procedure of the management board which define the distribution of responsibilities and the manner of cooperation between management board members, including procedures for conducting meetings and adopting decisions?	YES		
	112	The rules of procedure of the management board must be approved by the supervisory board?	YES		
	113	In the case of groups, the management board of the parent company ensured effective oversight of the activities of the other companies in the group and the existence of appropriate intra-group cooperation?	YES		
	114	In the case of groups, the management board of the parent company ensured there are rules setting out the scope, responsibilities and reporting arrangements at the parent company and subsidiary level, as well as rules to prevent conflicts of interest?	YES		
	115	In the case of groups, information about the supervision system and intra-group cooperation, as well as the intra-group rules of action are available free of charge on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GROUPA_.pdf

	116	In the case that no management control agreement has been concluded, the management board of a subsidiary prepared a report on the company's relations with related companies within the first three months of the business year?	YES		
	117	The report of the management board of a subsidiary on relations with related companies contains all legal transactions that the company undertook in the previous year with the controlling company or its related companies, or according to instructions in the interest of those companies, as well as all other actions that it undertook or failed to undertake in the past year according to instructions of those companies?	YES		
	118	The report of the management board of a subsidiary on relations with related companies contains, for both legal transactions and other actions, all information prescribed by Article 497, paragraphs 1 and 2 of the Companies Act?	YES		
	119	The auditor audited the report of the management board of a subsidiary on relations with related companies and submitted the signed report to the management board of the company?	YES		
	120	The supervisory board examined the report of the management board of a subsidiary on relations with related companies, took a position on the audit results, and informed the general meeting thereof in its report submitted to the general meeting?	YES		https://flare.shape404.agency/atlantisc/documents/3c516f535407ff3ce7c039f871d341f2/REPORT ON THE SUPERVISION OF BUSINESS ACTIVITIES FOR 2025 .pdf
5. Management board/Composition	121	The supervisory board ensures that the management board maintains a profile that specifies the minimum number of members and the combination of members of a given age, gender, skills, knowledge and education, as well as professional and practical experience, taking into	YES		

		account the need to ensure a balanced representation of both genders?			
5. Management board/President	122	The responsibility of the president of the management board for all activities under Article 49 of the Code is stipulated?	YES		
5. Management board/Limits on other appointments	123	The company's internal regulations provide that members of the management board must obtain prior approval from the supervisory board before accepting an appointment to join a board of a company that is not part of the same group?	YES		
	124	Members of the management board hold no more than two positions in management or supervisory boards of companies that are not part of the same group?	YES		
5. Management board/Management board evaluation	125	In the past twelve months, the supervisory board evaluated the effectiveness of the arrangements for cooperation between the supervisory and management boards, and the adequacy of the support and information it receives from the management board?	YES		
	126	The results of the evaluation of the arrangements for cooperation between the supervisory and management boards are included in the annual report?	YES		https://flare.shape404.agency/atlantisc/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	127	At least once a year, the management board evaluated its own effectiveness and that of its individual members, applying the same criteria and avoiding any form of discrimination?	YES		
	128	The management board reported to the supervisory board the conclusions of the evaluations of its own effectiveness and that of its individual members?	YES		

6. Remuneration of board members/Role of the remuneration committee	129	The remuneration committee recommends to the supervisory board the remuneration policy for management board members at least every three years, taking into account the amount and structure of the remuneration of senior management and the workforce as a whole, having carried out a preliminary assessment of the effects of that policy on the equality of remuneration of different genders for equal work and/or work of equal value?	YES		
	130	The remuneration committee recommended to the supervisory board the remuneration for management board members based on an assessment of the company's and their individual performance, taking into account the equality of remuneration of different genders for equal work and/or work of equal value?	YES		
	131	The remuneration committee recommended to the supervisory board the remuneration policy for supervisory board members and carried out a preliminary assessment of the effects of that policy on the equality of remuneration of different genders for equal work and/or work of equal value, and that policy was submitted for approval by the general meeting?	YES		
	132	The remuneration committee monitored the amount and structure of remuneration of senior management and the workforce as a whole, taking into account the equality of remuneration of different genders for equal work and/or work of equal value, and made recommendations to the management board on its policies?	YES		
	133	The remuneration committee oversaw the preparation of the annual remuneration report required by law for approval by the supervisory board?	YES		

6. Remuneration of board members/Remuneration of management board members	134	The supervisory board determined the annual remuneration of each management board member, based on the recommendations of the remuneration committee and in accordance with the approved remuneration policy?	YES		
	135	The remuneration policy is non-discriminatory, consistent with sustainability objectives, and prepared in accordance with the relevant legal requirements?	YES		
	136	Levels of remuneration for management board members take into account the agreed strategy, risk appetite, the economic environment in which the company operates, the fulfilment of sustainability objectives, and the pay and conditions of employees within the company?	YES		
	137	The remuneration policy prescribes that a member of the management board may not dispose of shares awarded to them as part of the remuneration package for at least two years from the day on which the shares were awarded to them?	YES		
	138	The remuneration policy prescribes that a member of the management board may not exercise share options awarded to them as part of the remuneration package for at least two years from the day on which the options were awarded to them?	YES		
	139	The remuneration policy includes provisions specifying the circumstances in which part of a management board member's remuneration would be withheld or recovered?	YES		
6. Remuneration of board members/Remuneration of supervisory board members	140	Levels of remuneration for the president of the supervisory board and other supervisory board members reflect their time commitment and responsibilities, including the time commitment and responsibilities in supervisory board committees?	YES		

	141	The company's remuneration policy and/or internal regulations prohibit the inclusion of variable elements or other performance-related elements in the remuneration of the supervisory board?	YES		
6. Remuneration of board members/Reporting on remuneration	142	The company adopted a remuneration policy for the supervisory board, management board, and senior management?	YES		
	143	The company carried out an assessment of the effects of remuneration policies on the equality of remuneration of different genders?	YES		
	144	The remuneration policy was approved by shareholders at the general meeting?	YES		
	145	The approved remuneration policy of the company is freely available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/corporate-governance/codes/
	146	The assessment of the effects of remuneration policies on the equality of remuneration of different genders is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	147	The annual remuneration report includes information on the remuneration of all individual members of the supervisory and management boards, with the content as specified in Article 60 of the Code and the Companies Act?	YES		
	148	The annual remuneration report includes information on the manner of determining the remuneration policy for the management board, the link between remuneration and long-term results, sustainability and resilience of the company, the structure and parameters for calculating the remuneration for the management board, the compliance of remuneration of the management	YES		

		board with the remuneration of senior management and the workforce as a whole, and the reasons for deviating from the implementation of the remuneration policy for the management board, if applicable?			
	149	The annual remuneration report includes information on the remuneration of each member of supervisory board committees who is not a member of the supervisory board, if applicable?	YES		
	150	The annual remuneration report is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/f004f24f0d2ba526eca500eab5b3f521/Report_on_the_remuneration_of_members_of_the_SB_and_MB_2025.pdf
	151	The auditor's report on the examination of the annual remuneration report is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/f004f24f0d2ba526eca500eab5b3f521/Report_on_the_remuneration_of_members_of_the_SB_and_MB_2025.pdf
7. Risks, internal control and audit/Roles of the supervisory and management boards	152	The management board adopted, upon prior approval by the supervisory board, a risk management policy specifying the nature and extent of the risks the company needs to and is willing to take in order to achieve its long-term strategic objectives?	YES		
	153	The risk management policy takes sustainability matters into account?	YES		
	154	The company's articles of association and/or internal regulations prescribe the management board's responsibility for identifying the major financial, operational and external risks associated with achieving the strategy and sustaining the	YES		

		company's activities, and for maintaining adequate risk management and internal control systems to manage and mitigate those risks?			
	155	The management board reports regularly to the supervisory board on the status of the major risks?	YES		
7. Risks, internal control and audit/Role of the audit committee	156	The audit committee monitors the integrity and completeness of the financial statements and accounting policies of the company and other formal announcements relating to the company's financial performance?	YES		
	157	The audit committee monitors the integrity and completeness of corporate sustainability reports and sustainability reporting policies and other formal announcements relating to the company's sustainability-related performance?	YES		
	158	The audit committee monitors the implementation of tax planning, including the distribution of tax on profit from cross-border activities?	YES		
	159	The audit committee monitors the effectiveness of the company's internal financial controls?	YES		
	160	The audit committee ensures the adequacy, independence and effectiveness of the external audit function?	YES		
	161	The audit committee ensures the independence and adequacy of the internal audit function?	YES		
	162	The audit committee monitors the implementation of actions identified as a result of external and internal audit and its own monitoring?	YES		
	163	The supervisory board (or a separate supervisory board committee or the audit committee) undertakes activities to monitor the effectiveness of	YES		

		the company's overall internal control and risk management systems?			
	164	The supervisory board (or a separate supervisory board committee or the audit committee) monitors the application of the procedures for reporting breaches of the law or the company's code of conduct?	YES		
7. Risks, internal control and audit/Relations with the external auditor	165	The audit committee oversees the process of selecting and appointing the external auditor in accordance with the requirements of the law, and makes recommendations to the supervisory board on the choice of the external auditor and the terms of their appointment?	YES		
	166	In the past twelve months, the audit committee approved the work plan of the external auditor covering the scope and materiality of the activities to be audited?	YES		
	167	The audit committee meets with the external auditor as needed to discuss issues identified in the course of the audit and to monitor the quality of the services provided?	YES		
	168	The audit committee monitors the independence and objectivity of the external auditor?	YES		
	169	The audit committee approved a policy on the provision of permitted non-audit services by the external auditor and monitors the implementation of that policy?	YES		
7. Risks, internal control and audit/Risk management and internal control	170	The audit committee reviewed the effectiveness of the risk management and internal control systems as a whole at least once a year?	YES		
	171	The audit committee made recommendations to the supervisory and management boards of the company regarding the effectiveness of the risk	YES		

		management and internal control systems, as necessary?			
	172	In its annual report, the company stated how the supervisory board conducted supervision regarding the effectiveness of the risk management and internal control systems?	YES		https://flare.shape404.agency/atlantia/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	173	In its annual report, the company described which significant internal controls were not effective, as well as measures and activities taken or proposed for their improvement?	YES		https://flare.shape404.agency/atlantia/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	174	The company maintains an effective risk management system that ensures reliable risk identification, measurement, responses, reporting, and monitoring?	YES		
	175	The risk management system covers all the risks that the company faces or may face, including climate and environmental risks, health crises, disruptions in supply chains, geopolitical tensions, tax risks, cybersecurity risks and risks related to the use of digital technologies, as well as financial and operational risks?	YES		
	176	The company designated clear internal responsibilities for maintaining the risk management system, as well as a clear procedure for maintaining contact between responsible persons and the audit committee?	YES		
	177	The company established an internal audit function with responsibility for supervising the effectiveness of internal control systems, including the management of risks?	YES		

	178	The audit committee approved the internal audit plan in the past twelve months?	YES		
	179	The audit committee received the internal auditor's reports and monitored the implementation of their recommendations?	YES		
	180	The audit committee is obliged to recommend the appointment or dismissal of the head of the internal audit function to the supervisory board?	YES		
	181	Where there is no internal audit function, the audit committee reviewed the need for such a function as part of its review of the internal control system in the past twelve months?	YES		
7. Risks, internal control and audit/Whistleblowing	182	The management board, with the prior approval of the supervisory board, adopted procedures for reporting breaches of the law, the company's code of conduct, or unethical behaviour, including cases where there is a suspicion of a breach or the possibility of one occurring?	YES		
	183	The procedure ensures that employees or external stakeholders do not suffer negative consequences if they report suspected misconduct, and that the identity of the whistle-blower remains protected?	YES		
	184	The procedures comply with the rules on the protection of whistleblowers, gender equality, protection against any form of harassment, and anti-discrimination?	YES		
	185	A detailed description of the procedure for reporting breaches of the law, the company's code of conduct, or unethical behaviour is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE OF THE CORPORATE GOVERNANCE OF ATLANTIC GROUPA .pdf

	186	The management board appointed a person in charge of resolving reported irregularities?	YES		
	187	The company's articles of association and/or internal regulations prescribe the management board's duty to immediately report all identified irregularities to the supervisory board, arrange the measures to be taken, and inform the supervisory board of the results of the implemented measures?	YES		
	188	The company's articles of association and/or internal regulations prescribe the management board's duty to inform the whistleblower of the results of the implemented measures, unless otherwise regulated by the relevant regulation?	YES		
	189	The company's articles of association and/or internal regulations prescribe the management board's duty to ensure the protection of the whistleblower's identity and the protection against possible retaliation?	YES		
	190	The audit committee reviewed the effectiveness of the whistleblowing procedure and its application at least annually?	YES		
8. Disclosure and transparency/Use of the company website	191	All information that the company is required to disclose in accordance with the law, listing rules, the Code and its own articles of association is freely available on the company's website?	YES		
	192	The company's website is easily accessible, available to end users, clear and user-friendly?	YES		
	193	The company's annual report is available on the company's website?	YES		
	194	The half-year and quarterly reports and other financial information required to be disclosed are available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/financial-reports/financial-results/

	195	Sustainability-related information that can reasonably be expected to influence the investor's valuation of the company or their investment or voting decisions is available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	196	Information on the terms of reference, composition and members of the supervisory board and its committees, and the management board, including information on the independence of each individual board member and the criteria for their independence is available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	197	The company's articles of association and other internal regulations in accordance with the Code are available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/corporate-governance/statutes/
	198	The company's policies on environmental and social impact, human rights, including children's rights, inclusive working environment, corruption and bribery, and discrimination are available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf
	199	The company's code of conduct and details of how to report suspected misconduct are available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf
	200	The organisational chart detailing the position of the company within the group, if the company is part of a group, including intra-group policies, is available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/financial-reports/annual-reports/
	201	Information on any cross-shareholdings involving the company is available on the company's website?	YES		https://www.atlanticgrupa.com/en/
	202	The report on corporate income tax information is available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/financial-reports/financial-results/

	203	The report on related party transactions is available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/2c34e1b6c0ad03b8278b63ad7ca62cdc/Atlantic_Grupa_d.d._Related_Party_Report_2025.pdf
	204	The report on the company's relations with related companies is available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/2c34e1b6c0ad03b8278b63ad7ca62cdc/Atlantic_Grupa_d.d._Related_Party_Report_2025.pdf
	205	Information on the concluded shareholders' agreements, including detailed information on who the parties to the agreement are, what is the basic purpose of the concluded agreement and how it is achieved, as prescribed by law, is available on the company's website?	YES		https://www.atlanticgrupa.com/en/
	206	Details of changes in the shareholdings of supervisory and management board members, other persons discharging managerial responsibilities, as well as persons closely associated with them, notifiable under applicable laws and regulations, and any related party transactions are available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/notices/
	207	The remuneration policy for members of the supervisory board, management board and senior management, as well as the annual remuneration report are available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/9ce03bf484cca823e71ac797b3d98e15/Remuneration_Policy_for_members_of_the_Management_Board_2024.pdf https://flare.shape404.agency/atlantic/documents/ad5ff642b6a48fcf149daf422ea0bdc6/Decision_od_2026.pdf https://flare.shape404.agency/atlantic/documents/f004f24f0d2ba526eca500eab5b3f521/Report_on_the_remuneration_of_members_of_the_SB_and_MB_2025.pdf

	208	The company's dividend policy is available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/corporate-governance/codes/
	209	The risk management policy, including information on the nature and effectiveness of the related due diligence procedures and measures, is available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/6e46fc349c2ee2a588fd81deaec95edb/RISK_MANAGEMENT_FRAMEWORK_SUMMARY.pdf
	210	A calendar of events for the next twelve months, including dates of the general meeting, publication of financial results, dividend payments and investor conferences, is available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/events/
	211	All materials related to the general meeting, including the decisions of the meeting, are available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/events/
	212	The name and contact details of the persons in charge for investor relations are available on the company's website?	YES		https://www.atlanticgrupa.com/en/contact/
	213	The company ensured that the information on the website is kept up to date and published in accordance with time limits prescribed by law and regulations?	YES		
	214	All information on the website is freely available in the Croatian language?	YES		
	215	All information on the website is freely available in the English language?	YES		
8. Disclosure and transparency/Annual report	216	The company's annual report contains a record of the number of supervisory board and committee meetings held, and each member's attendance at these meetings?	YES		
	217	The company's annual report contains information on all shares and other financial instruments of the	YES		

		company held by supervisory and management board members and senior management, notifiable under applicable laws and regulations, and in other companies that compete with the company's business?			
	218	The company's annual report contains information on all contracts and agreements between members of the management or supervisory boards and the company (or persons related to either party)?	YES		
	219	The company's annual report contains the results of the supervisory board's evaluation of its own effectiveness, and the effectiveness of the arrangements for cooperation with the management board?	YES		
	220	The company's annual report contains a report on the work of each supervisory board committee, including information on the number of meetings held, the members of the committee and their attendance record?	YES		
	221	The company's annual report contains information on the concluded shareholders' agreements, including detailed information on who the parties to the agreement are, what is the basic purpose of the concluded agreement and how it is achieved, as prescribed by law?	YES		
	222	The company's annual report contains a report on gender equality and the fulfilment of the conditions regarding gender balance on the supervisory board, management board and senior management, with an explanation if these are not met?	YES		
	223	The company's annual report contains a report on the fulfilment of the conditions relating to the independence of the supervisory board members and the criteria for their independence?	YES		

	224	The company's annual report includes a description of sustainability-related objectives determined by the company, and the report on their achievement?	YES		
	225	The company's annual report includes information on issued bonds and other concluded debt agreements, including information on the obligations assumed by the company under such agreements, which, in the event of a breach of the terms of the agreement, may limit the rights of the management board and shareholders or require changes in the company's operations, as well as information on the likelihood of such events occurring?	YES		
	226	The statement of application of the corporate governance code is included in the company's annual report?	YES		
	227	The statement of application of the corporate governance code contains all information prescribed by the Accounting Act?	YES		
9. Shareholders and the general meeting/Relations with shareholders	228	The company ensured that all shareholders, irrespective of the number or class of shares they hold, have equal access to information about the company and how they can exercise and protect their rights?	YES		
	229	The company has effective formal mechanisms to enable minority shareholders to raise issues directly with the presidents of the supervisory and management boards?	YES		
	230	Information on formal mechanisms to enable minority shareholders to raise issues directly with the presidents of the supervisory and management boards is freely available on the company's website?	YES		https://flare.shape404.agency/atlantic/documents/2467d9b63c22e32cb0d58ff35445ea08/ARTICLES_OF_ASSOCIATION_OF_ATLANTIC_GRUPA_D.D.pdf
	231	The company designated an individual as the investor relations contact for all shareholders,	YES		

		whose responsibilities include ensuring that shareholders receive a rapid response to requests for information?			
9. Shareholders and the general meeting/General meeting	232	The company's articles of association and/or internal regulations do not place any restrictions on the ability of shareholders to convene or participate in a general meeting, or to place items on the agenda?	YES		
	233	The company's articles of association and/or internal regulations provide all shareholders with the opportunity to exercise their votes by proxy without any restrictions?	YES		
	234	The company's articles of association and/or internal regulations provide all shareholders with the opportunity to exercise their votes by electronic communication without any restrictions?	YES		
	235	An explanation of the different means by which shareholders can exercise their votes is included in the documents for the general meeting?	YES		
	236	The company's articles of association or the management board's decision allow for the general meeting to be held in a hybrid format?	YES		
	237	The company's articles of association or the management board's decision enable shareholders who do not participate in the work of a general meeting to cast their votes in writing or via electronic communication (correspondence voting) after the publication of the invitation to a general meeting but before it is held?	YES		
	238	The notice of a general meeting was issued no later than 30 days before the general meeting?	YES		

	239	The agenda, resolutions and all other documents required for the general meeting are freely available on the company's website?	YES		https://www.atlanticgrupa.com/en/investors/events/
	240	All documents are available in both Croatian and English?	YES		
	241	The company published on its website how shareholders can participate in the general meeting and exercise the right to vote, especially when this right is exercised via electronic communication, and how the company has ensured the legally prescribed conditions for the use of electronic communication?	YES		
	242	The president and deputy president of the supervisory board, the presidents of the supervisory board committees, and all members of the management board attended the general meeting in the past twelve months?	YES		
	243	The external auditor attended the general meeting at which the financial reports were presented?	YES		
	244	The company made the decisions of the general meeting freely available on its website?	YES		https://www.atlanticgrupa.com/en/investors/notices/
	245	The company made the answers to questions asked at the general meeting freely available on its website within 30 days of the meeting?	YES		https://www.atlanticgrupa.com/en/investors/notices/
10. Shareholders, sustainability and resilience/Responsible business conduct	246	The supervisory and management boards agreed and adopted policies on assessing the environmental and social impacts of the company's activities, and managing the associated risks, in the entire value chain?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf
	247	The supervisory and management boards agreed and adopted policies on the protection of human rights, children's rights and the rights of employees, particularly persons with disabilities, in the entire value chain?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRP_RUPA_.pdf

	248	The supervisory and management boards agreed and adopted policies on creating an inclusive work environment, in particular for persons with disabilities?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA.pdf
	249	The supervisory and management boards agreed and adopted policies on achieving the work-life balance of employees?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	250	The supervisory and management boards agreed and adopted policies on ensuring the equal remuneration for different genders, for equal work and/or work of equal value?	YES		https://flare.shape404.agency/atlantic/documents/61b2ecf8d306ae4d42f7443c9818b2a7/Annual_report_for_2025.pdf
	251	The supervisory and management boards agreed and adopted policies on preventing and sanctioning any form of discrimination, especially on the basis of gender and disability, and protecting the persons reporting it?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA.pdf
	252	The supervisory and management boards agreed and adopted policies on preventing and sanctioning corruption and bribery, and protecting the persons reporting them?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA.pdf
	253	The supervisory and management boards agreed and adopted policies on tax planning which ensure that most of the taxes are paid in the countries where activities are carried out and income is generated?	YES		https://flare.shape404.agency/atlantic/documents/abfdfe5e0a878960d22ec51aa1ca6186/AUDIT_COMMITTEE_CHARTER.pdf
	254	The supervisory and management boards agreed and adopted policies on communication between the company and the main stakeholders?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA.pdf

	255	The supervisory and management boards agreed and adopted policies on the due diligence procedures and measures in the company, its associated companies and, where relevant, its direct and indirect business partners?	YES		https://flare.shape404.agency/atlantic/documents/1ef1a185a65e84ef1a5daaee20c78ec8/CODE_OF_THE_CORPORATE_GOVERNANCE_OF_ATLANTIC_GRPUPA_.pdf
	256	When agreeing on and adopting the policies specified in Article 88 of the Code, the supervisory and management boards were guided by the recommendations on responsible business conduct as set out in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the applicable implementing OECD Due Diligence Guidance for Responsible Business Conduct?	YES		
	257	All policies from Article 88 of the Code are freely available on the company's website?	YES		
	258	The supervisory and management boards ensured periodic monitoring of the implementation and effectiveness of all policies they agreed on and adopted in accordance with Article 88 of the Code?	YES		
	259	When the management board seeks the supervisory board's prior approval on decisions, the supporting documents explain how the recommended action is consistent with the policies set out in Article 88 of the Code?	YES		
10. Shareholders, sustainability and resilience/Stakeholder engagement	260	The supervisory and management boards jointly identified who they consider to be the company's key stakeholders?	YES		
	261	The management board ensured that there are effective mechanisms in place for regular engagement with the key stakeholders, and that the supervisory board is informed of the results of these engagements?.	YES		

	262	The supervisory board is authorised, with prior notice to the president of the management board, to organise meetings with external stakeholders where it considers it necessary?	YES		
	263	The mandate for each supervisory board committee clearly specifies the purposes for which the president of a committee can communicate directly with stakeholders and the procedure to be followed in such cases?	YES		
10. Shareholders, sustainability and resilience/In-house training	264	The company continuously organises training for the supervisory and management boards and all employees regarding gender equality, inclusion of persons with disabilities and children's rights, especially when the structure of employees has changed significantly or when the regulations related to these matters have changed significantly?	YES		
	265	Training is organised in cooperation with competent institutions, civil society organisations or experts dealing with these matters in the field of employment and labour?	YES		