HRVATSKA POŠTANSKA BANKA d.d.
Management Board
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LEI	529900D5G4V6THXC5P79
Home Member State of Issuer	Republic of Croatia
ISIN	HRHPB0RA0002
Stock Exchange Identifier	HPB
Regulated Market/ Segment	Zagreb Stock Exchange Inc. Official Market

Zagreb, September 16, 2026
No: F00-105/26-SČ

Zagreb Stock Exchange Inc.

Croatian Financial Services Supervisory Agency ("HANFA")

Croatian News Agency OTS HINA

Subject: HRVATSKA POŠTANSKA BANKA, p.l.c.
- **The Corporate Governance Code**
- **Compliance questionnaire for 2025 - Correction**

Hrvatska poštanska banka, p.l.c. Zagreb, Jurišićeva ulica 4 (hereinafter the Bank) published the Compliance Questionnaire with the Corporate Governance Code for 2025. on August 28, 2026, and, subsequently, following the identification of an inadvertent error, published a correction thereof on August 31, 2026, on the Bank's website www.hpb.hr, on the Zagreb Stock Exchange, in CFSSA's Official register („HANFA") and through the otsHINA service.

As HANFA, during the processing of data from the submitted GIKU-UOU and GIKU-UOP questionnaires, identified certain discrepancies in the responses that may affect the compliance assessment, the Bank hereby corrects, due to an obvious clerical error, its response to the question listed below in the Compliance Questionnaire with the Corporate Governance Code for 2025. as follows:

- For the question: ***"3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Bord / Has the Supervisory Board adopted a succession plan?",*** the answer **"NO"** is corrected to **"PARTIALLY"**, with the following explanation:

  The Nomination Committee established a Succession Plan for the members of the Bank's Management Board, to which the Supervisory Board gave its approval. The Bank does not have a succession plan for the Supervisory Board, because, the Supervisory Board is elected in accordance with the Regulation on the Criteria for the Selection and Appointment of Members of the Supervisory and Management Boards of Legal Entities of Special Interest to the Republic of Croatia and the Manner of Their Selection. Pursuant to Article 8 of that Regulation, candidates for membership of the Supervisory Board are proposed to the General Meeting by the Government of the Republic of Croatia. Successors (deputies) for individual senior management positions have been determined by the Bank's Management Board through the Bank's internal Organisation Rulebook.

The rest of the answers and clarification from the HPB's Compliance Questionnaire with the Corporate Governance Code for 2025, remain unchanged.

Here given correction of the Compliance Questionnaire with the Corporate Governance Code for 2025 will be submitted on the Bank's website www.hpb.hr, on the Zagreb Stock Exchange, in CFSSA's Official Register („HANFA") and through the otsHINA service.

Hrvatska poštanska banka, p.l.c.

Year	2025
Institution Code	Hrvatska poštanska banka plc

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
1. Leadership/Collaboration	Do the Company's articles of association and/or other internal acts clearly define the responsibilities of the Supervisory Board and the Management Board, in accordance with applicable laws and arrangements under which the Management Board and the Supervisory Board cooperate?	YES		
1. Leadership/Collaboration	Are the Company's Articles of Association (and/or other internal documents) available free of charge on the Company's website?	YES		https://www.hpb.hr/UserDocsImages/odnosi-s-investitorima/korporativni-dokumenti/2023_08_30_STATUT%20HPB_potpuni%20tekst.pd
1. Leadership/Collaboration	Has the Supervisory Board adopted a resolution listing the categories of decisions and legal transactions that require its prior approval and those on which the Management Board must consult the Supervisory Board before taking a decision?	NO	The Credit Institutions Act, the relevant subordinate legislation and the Bank's relevant internal regulations governing individual areas specify the categories of decisions and/or legal transactions for which the prior consent or approval of the Supervisory Board is required.	
1. Leadership/Collaboration	Is the summary of the decision available free of charge on the Company's website?	NO	The Credit Institutions Act, the relevant subordinate legislation and the Bank's relevant internal regulations governing individual areas specify the categories of decisions and/or legal transactions for which the prior consent or approval of the Supervisory Board is required.	
1. Leadership/Collaboration	Do the Company's Articles of Association and/or internal acts provide for the prior consent of the Supervisory Board for making important decisions that affect the Company's strategy, expenses, risk exposure and reputation?	YES		
1. Leadership/Collaboration	Do the Company's Articles of Association and/or internal acts stipulate that the Supervisory Board and its committees have timely access to documents, premises, as well as to senior management and employees when necessary to perform their duties?	YES		
1. Leadership/Collaboration	Did the management report to the Supervisory Board at regular intervals on the Company's operating results, financial situation, significant financial and other risks, the Company's resilience and the results of interactions with shareholders and other stakeholders?	YES		
1. Leadership/Collaboration	Did the management and the Supervisory Board agree on the content, form and frequency of these reports?	YES		
1. Leadership/Collaboration	Do the articles of association and/or internal acts stipulate that the chairman of the Management Board must notify the Supervisory Board if an event occurs or is likely to occur that could potentially affect the Company's results, financial position or reputation?	NO	Article 189 of the Credit Institutions Act specifies the circumstances in which the Bank's Management Board must notify the Supervisory Board.	
1. Leadership/Rules of Conduct	Has the Supervisory Board approved a Code of Conduct (or other internal act) that establishes rules of conduct that must be followed by members of the Management Board and Supervisory Board, employees and others acting on behalf of the Company?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
1. Leadership/Rules of Conduct	Does the Code of Conduct (or other internal act) contain provisions that ensure an inclusive working environment, equal opportunities for different genders and the prohibition of any form of discrimination, as well as rules of conduct and measures that will be taken in case of their violation?	YES		
1. Leadership/Rules of Conduct	Is the Code of Conduct (or other internal act) available free of charge on the Company's website?	YES		https://www.hpb.hr/hr/transparentno-korporativno-upravljanje/7626
1. Leadership/Rules of Conduct	Does the Supervisory Board oversee the implementation and monitor the effectiveness of the Code of Conduct (or other internal act)?	YES		
1. Leadership/Rules of Conduct	Does the Code of Conduct (and/or other internal act) take into account the recommendations for responsible business conduct as prescribed in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the applicable OECD Implementation Guidelines for Due Diligence on Responsible Business Conduct?	Partially	HPB is not a multinational enterprise; but, it has taken into account and implemented the principles of responsible business conduct promoted by the OECD Guidelines, especially: • CSR and sustainable development (item 1.1); • environmental responsibility (item 1.2); • corporate governance (item 1.3); • prevention of conflicts of interest and anti-corruption conduct (items 2.3 and 8.7); • relations with contractual partners and the value chain (Chapter 4); • equality, human rights and non-discrimination (items 2.5 and 8.1); and • protection of whistleblowers (item 8.6).	
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Are members of the Management Board and Supervisory Board prohibited from participating in decision-making in relation to which they have a conflict of interest?	YES		
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Has the Company adopted a policy for managing conflicts of interest?	YES		
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Has the Supervisory Board given prior approval to the policy for managing conflicts of interest?	YES		
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Is the conflict of interest management policy available free of charge on the Company's website?	YES		https://www.hpb.hr/hr/politika-upravljanja-sukobom-interesa/8166
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Do members of the Supervisory Board have an obligation to inform the entire supervisory board that they have an existing or potential conflict of interest?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Do Management Board members have an obligation to inform the Chair of the Supervisory Board and other Management Board members about an existing or potential conflict of interest?	YES		
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Is the Supervisory Board required to keep records of all notifications concerning an existing or potential conflict of interest, including a description of the action taken and the outcome in each case?	YES		
2. Duties of Management and Supervisory Board Members/Conflict of Interest	Do members of the Management Board and Supervisory Board have an obligation to notify the Chair of the Supervisory Board if they believe that another member of the management or supervisory board has an existing or potential conflict of interest that they have not declared, or to notify the deputy Chair of the Supervisory Board if it is the Chair of the Supervisory Board?	YES		
2. Duties of Management and Supervisory Board Members/Prohibition of Competition	Do members of the Supervisory Board and management board not perform activities that compete with the Company's operations, either for their own account or for someone else's?	YES		
2. Duties of Management and Supervisory Board Members/Prohibition of Competition	Are the members of the Supervisory Board and management not members of the management or supervisory board of companies that perform activities that compete with the Company's operations?	YES		
2. Duties of Management and Supervisory Board Members/Prohibition of Competition	Do members of the Supervisory Board and management board not hold significant stakes in companies that compete with the Company's operations?	YES		
2. Duties of Management and Supervisory Board Members/Prohibition of Competition	Have members of the Management Board and Supervisory Board who hold interests in companies that compete with the Company notified the Company Secretary of such interests?	NO	They hold no ownership interests.	
2. Duties of Management and Supervisory Board Members/Prohibition of Competition	Are details of the shares held by the Supervisory Board and management in companies that compete with the Company's operations available free of charge on the Company's website?	NO	They hold no ownership interests.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Is prior approval of the Supervisory Board required for every transaction between members of the Management Board or Supervisory Board and the Company (or persons related to either party)?	YES		
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Must the fair value of each material transaction, as defined by law, be confirmed by an independent expert before the transaction is entered into?	NO	Given the nature of the Bank's activities, namely its lending and deposit-taking business, the fair value of such transactions is equal to their nominal monetary value. Furthermore, neither the Credit Institutions Act, subordinate legislation nor EU regulations applicable to credit institutions require such a procedure in respect of such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Must an independent expert's report on the fair value of each material transaction be made freely available on the Company's website?	NO	Given the nature of the Bank's activities, namely its lending and deposit-taking business, the fair value of such transactions is equal to their nominal monetary value. Furthermore, neither the Credit Institutions Act, subordinate legislation nor EU regulations applicable to credit institutions require such a procedure in respect of such transactions.	

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
2. Duties of Management and Supervisory Board Members/Related Party Transactions	If the Supervisory Board has appointed a special committee in accordance with the law or authorised an Audit Committee to decide on prior approval for entering into transactions with related parties, do the members of such a committee meet the independence requirements prescribed for members of the Supervisory Board?	NO	The Supervisory Board has not appointed a separate committee to decide on prior approval for the transactions concerned; instead, the Supervisory Board itself decides whether to grant prior approval for such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	If the Supervisory Board has appointed a special committee in accordance with the law or authorised an Audit Committee to decide on prior approval for entering into transactions with related parties, are the members of such committee independent of the persons and transactions that are the subject of prior approval?	NO	The Supervisory Board has not appointed a separate committee to decide on prior approval for the transactions concerned; instead, the Supervisory Board itself decides whether to grant prior approval for such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Has the Company adopted procedures for approving and publishing transactions between members of the management or supervisory board and the Company (or persons related to any party)?	YES		
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Does the Audit Committee evaluate the effectiveness of these procedures annually?	YES		
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Does the Company promptly publish on its website information on transactions with related parties that require prior approval from the Supervisory Board, for transactions of the Company and for transactions of subsidiaries with related parties of the parent company?	NO	Given the nature of the Bank's activities, namely its lending and deposit-taking business, the fair value of such transactions is equal to their nominal monetary value. Furthermore, neither the Credit Institutions Act, subordinate legislation nor EU regulations applicable to credit institutions require such a procedure in respect of such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Does the related party transaction notification contain at least information about the nature of the relationship with the related party, the names of the related parties, the date and value of the transaction?	NO	Given the nature of the Bank's activities, namely its lending and deposit-taking business, the fair value of such transactions is equal to their nominal monetary value. Furthermore, neither the Credit Institutions Act, subordinate legislation nor EU regulations applicable to credit institutions require such a procedure in respect of such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Is such transaction information available to the public for at least five years on the Company's website?	NO	Given the nature of the Bank's activities, namely its lending and deposit-taking business, the fair value of such transactions is equal to their nominal monetary value. Furthermore, neither the Credit Institutions Act, subordinate legislation nor EU regulations applicable to credit institutions require such a procedure in respect of such transactions.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Does the Management Board prepare, once a year, a report on related-party transactions with the content prescribed by the Companies Act?	NO	Pursuant to Articles 497 and 498 of the Companies Act, this report must be prepared by dependent companies. As HPB is not a dependent company, it is not required to prepare the report concerned.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Has the auditor audited the report on related-party transactions and submitted the signed auditor's report to the Company's Management Board?	NO	Pursuant to Articles 497 and 498 of the Companies Act, this report must be prepared by dependent companies. As HPB is not a dependent company, it is not required to prepare the report concerned.	
2. Duties of Management and Supervisory Board Members/Related Party Transactions	Did the Supervisory Board examine the report on transactions with related parties and take a position on the results of the audit and report it to the General Meeting in its report that it submits to the General Meeting?	NO	Pursuant to Articles 497 and 498 of the Companies Act, this report must be prepared by dependent companies. As HPB is not a dependent company, it is not required to prepare the report concerned.	
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Is the Supervisory Board responsible for appointing and dismissing Management Board members and for recommending candidates for Supervisory Board membership to the General Meeting?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Has the Supervisory Board adopted formal and transparent procedures for appointment to the Management Board and Supervisory Board and for selecting senior management?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Has the Supervisory Board adopted a succession plan?	Partially	The Nomination Committee established a Succession Plan for the members of the Bank's Management Board, to which the Supervisory Board gave its approval. The Bank does not have a succession plan for the Supervisory Board, because, the Supervisory Board is elected in accordance with the Regulation on the Criteria for the Selection and Appointment of Members of the Supervisory and Management Boards of Legal Entities of Special Interest to the Republic of Croatia and the Manner of Their Selection. Pursuant to Article 8 of that Regulation, candidates for membership of the Supervisory Board are proposed to the General Meeting by the Government of the Republic of Croatia. Successors (deputies) for individual senior management positions have been determined by the Bank's Management Board through the Bank's internal Organisation Rulebook.	
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Do the procedures for appointment to the Management Board and Supervisory Board and for the selection of senior management contain objective criteria for appointment or selection, giving priority under the same conditions to a person of the underrepresented gender?	YES	The Diversity Policy defines diversity in relation to appointments to the Management Board and the Supervisory Board and recognises the need to achieve diversity; however, no equivalent provisions are in place for senior management.	
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Has a prior assessment of the impact of procedures for appointment to the Management Board and Supervisory Board and for the selection of senior management, as well as the succession plan, on gender equality been carried out?	NO	HPB d.d.'s Policy on Promoting Diversity on the Management and Supervisory Board addresses diversity in terms of education, experience, age and sex. The Policy includes a strategy for achieving such objectives. Achieving gender balance is implemented by requiring that, where two or more candidates of equal qualifications and abilities are considered for election or appointment to the Management or Supervisory Board, preference be given to the underrepresented sex. Same applies to senior management. No formal document with an ex ante impact assessment of the procedures has been prepared.	
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Has a preliminary assessment of the impact of the procedures for appointment to the Management Board and Supervisory Board and for the selection of senior management, as well as the succession plan, on gender equality been published free of charge on the Company's website?	NO	HPB d.d.'s Policy on Promoting Diversity on the Management and Supervisory Board addresses diversity in terms of education, experience, age and sex. The Policy includes a strategy for achieving such objectives. Achieving gender balance is implemented by requiring that, where two or more candidates of equal qualifications and abilities are considered for election or appointment to the Management or Supervisory Board, preference be given to the underrepresented sex. Same applies to senior management. No formal document with an ex ante impact assessment of the procedures has been prepared.	https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Is the representation of at least 40% of members of the underrepresented gender ensured in the Supervisory Board or in the Supervisory Board and management board together?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	If the representation of at least 40% of members of the underrepresented gender has not been achieved, has the Company taken measures to achieve the prescribed representation and adopted a plan and deadline for achieving it, which cannot be longer than two years from the occurrence of unbalanced gender representation?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Supervisory Board	Does the Company publish in its annual report all measures taken by the Company, the plan and deadline for achieving the prescribed representation of the underrepresented gender, along with an explanation of why the percentage was not achieved?	YES		https://www.hpb.hr/hr/financijska-izvjesca/322

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Does the Nomination Committee oversee the process for appointments to the Supervisory Board and Management Board to ensure that it is fair, transparent and non-discriminatory, promotes diversity, inclusion and equal opportunities, and achieves balanced representation of both genders?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Has the Nomination Committee developed role descriptions and candidates for each vacant position in line with the profile of the management or supervisory board and identified and recommended suitable candidates to the Supervisory Board?	NO	The Decision on the Assessment of the Suitability of the President and Members of the Management Board, the Chair and Members of the Supervisory Board, and Key Function Holders in a Credit Institution lays down the requirements for membership of the management and supervisory boards of a credit institution, as well as the requirements candidates must meet regarding suitability, good repute, professional knowledge, skills, experience, time commitment and collective suitability.	
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	When searching for independent candidates for the Supervisory Board, did the Nomination Committee determine that the candidates were independent and based on what criteria (as defined in Appendix A)?	NO	The independence criteria applicable to the President and members of the Management Board and the Chair and members of the Supervisory Board are laid down in the Decision on the Assessment of the Suitability of the President and Members of the Management Board, the Chair and Members of the Supervisory Board, and Key Function Holders in a Credit Institution.	
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Has the Nomination Committee prepared a succession plan for the reappointment or replacement of members of the Supervisory Board and management board, in consultation with the Chair of the Supervisory Board or management board?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Has the Nomination Committee overseen progress towards achieving the target representation of the underrepresented gender on the Management Board, Supervisory Board and in senior management?	NO	As no elections or appointments to the Management Board or the Supervisory Board took place in 2025, the Nomination Committee did not monitor progress towards achieving the target percentage of women on those boards. This forms part of the Nomination Committee's remit and is taken into account when appointments are made.	
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Has the Nomination Committee overseen the Management Board's policies for the selection and appointment of senior management?	YES		
3. Appointment of Management and Supervisory Board Members/Role of the Nomination Committee	Has the Nomination Committee overseen the implementation of an internal assessment and an employee survey on perceptions of gender equality and equal opportunities within the Company?	NO	Although the Bank conducts internal performance appraisals, the Nomination Committee does not oversee them and considers them only when carrying out suitability assessments. The Bank does not conduct an internal staff survey on perceptions of gender equality. Gender equality is promoted through the Bank's sustainable business practices.	
3. Appointment of Management and Supervisory Board Members/Election of Supervisory Board Members at the General Meeting	When proposing a candidate for the Supervisory Board to the General Meeting, does the Company make all information from Article 19 of the Code available free of charge on the Company's website among the materials for the General Meeting?	Partially	Only the curricula vitae of the candidates listed under item 54 were published for the General Meeting held on 9 May 2025.	
3. Appointment of Management and Supervisory Board Members/Election of Supervisory Board Members at the General Meeting	Must the proposal for the election of Supervisory Board members state, for each proposed member, whether the person is independent within the meaning of Article 255(6) of the Companies Act and, where applicable, explain why the Supervisory Board considers the candidate independent and on the basis of which criteria under the Companies Act and/or the Code?	YES	The proposal contains information on independence, while the explanations concerning the independence criteria are set out in the individual suitability assessments.	https://www.hpb.hr/UserDocsImages/Javno%20objavljene%20informacije/Javno%20objavljene%20informacije/HPB%20d.d._Dopuna%20dnevnog%20reda%20Glavne%20skups%CC%8Ctine%20sazvane%20za%209.%20svibnja%202025_11_04_2025.pdf?vel=117631
3. Appointment of Management and Supervisory Board Members/Election of Supervisory Board Members at the General Meeting	In the event that a current member of the Supervisory Board is proposed, do the materials for the General Meeting also contain all the information from Article 20 of the Code?	YES	Only the curricula vitae of the candidates listed under item 54 were published for the General Meeting held on 9 May 2025.	https://www.hpb.hr/hr/glavna-skupstina/324

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
3. Appointment of Management and Supervisory Board Members/Election of Supervisory Board Members at the General Meeting	Is the information referred to in Articles 19 and 20 of the Code also made freely available on the Company's website when an employee representative or another Supervisory Board member who is not elected by shareholders at the General Meeting is appointed?	NO	The Articles of Association do not provide for Supervisory Board members elected by employees or for Supervisory Board members who are not elected by shareholders at the General Meeting.	
4. Supervisory Board and Its Committees/Responsibilities of the Supervisory Board	Do the responsibilities of the Supervisory Board include appointing and dismissing Management Board members and succession planning; contributing to the development and approval of the Company's strategy, business plan and budget; and monitoring the Management Board's performance, fulfilment of its duties and cooperation with shareholders and other stakeholders?	YES		
4. Supervisory Board and Its Committees/Responsibilities of the Supervisory Board	Do the responsibilities of the Supervisory Board include ensuring at least 40% representation of the underrepresented gender on the Supervisory Board, or on the Supervisory Board and Management Board combined?	YES		
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	Has the Supervisory Board developed a Supervisory Board profile specifying the minimum number of members and the required mix of age, gender, skills, knowledge, education, and professional and practical experience?	Partially	The number of Supervisory Board members is laid down in the Bank's Articles of Association, which are adopted by the General Meeting. The target composition of the Supervisory Board and the eligibility requirements for membership of the Supervisory Board are laid down in the Policy on the Target Composition and Assessment of the Suitability of Members of the Bank's Supervisory Board, in accordance with the Credit Institutions Act and the Croatian National Bank's Decision on the Assessment of Suitability.	
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	Does the Supervisory Board include members of different genders, ages, profiles and experience so as to ensure a diversity of perspectives in decision-making and balanced representation of both genders?	YES		
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	Are the majority of the members of the Supervisory Board independent in accordance with the definition in Appendix A of the Code?	YES	Three of the five members of the Supervisory Board are independent.	
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	Are the president or deputy president of the Supervisory Board independent?	YES		
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	If the majority of the members of the Supervisory Board are not independent, has the Supervisory Board adopted measures, a plan and a deadline for achieving independence that cannot be longer than two years from the date when the majority of the members of the Supervisory Board are not independent?	NO	The majority of the Supervisory Board members are independent.	
4. Supervisory Board and Its Committees/Composition of the Supervisory Board	Does the Company publish in its annual report all measures taken by the Company to achieve the independence of the Supervisory Board, the plan and deadline for achieving independence, along with an explanation of why independence has not been achieved?	NO	The majority of the Supervisory Board members are independent.	
4. Supervisory Board and Its Committees/Chair	Does the Chair of the Supervisory Board have the responsibilities specified in Article 26 of the Code?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Has the Supervisory Board established a Nomination Committee?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Has the Supervisory Board established a Remuneration Committee?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
4. Supervisory Board and Its Committees/Supervisory Board Committees	Has the Supervisory Board established an Audit Committee?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Has the Supervisory Board determined the mandate and activities of each of its committees?	Partially	The Supervisory Board has defined the term of office and activities of each of its committees, except for the terms of office of the two Audit Committee members who are not also members of the Supervisory Board, as they are elected by the General Meeting, which also determines their terms of office.	
4. Supervisory Board and Its Committees/Supervisory Board Committees	Does each Supervisory Board committee consist of members with the skills, knowledge, education, and professional and practical experience necessary to perform the committee's functions effectively?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Does each Supervisory Board committee have at least three members?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Are the majority of the members of each Supervisory Board committee independent as defined in Appendix A of the Code?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Are Management Board members prohibited from being members of the Supervisory Board?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Is the independence of the Supervisory Board ensured through independent Supervisory Board members?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Committees	Is the job description of each committee of the Supervisory Board available free of charge on the Company's website?	YES		https://www.hpb.hr/hr/odbori-nadzornog-odbora-2878/2878
4. Supervisory Board and Its Committees/Supervisory Board Committees	Does the Company include in its annual report a report on the work of each committee of the Supervisory Board, including information on the number of meetings held, board members and the independence of each board member?	YES		https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
4. Supervisory Board and Its Committees/Time Commitment	Is the expected minimum time commitment of each Supervisory Board member determined at the time of appointment?	YES		
4. Supervisory Board and Its Committees/Time Commitment	Is the Company's annual report published with a record of the attendance of each member of the Supervisory Board at the meetings of the Supervisory Board and its committees?	YES		https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
4. Supervisory Board and Its Committees/Time Commitment	Do the Company's Articles of Association and/or internal acts provide for the obligation of Supervisory Board members to inform the Company Secretary about their membership in the Supervisory Board or management of other companies?	YES		
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	Are Supervisory Board meetings held at least once every three months?	YES		
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	Has the Supervisory Board adopted a work plan that includes the timing and agenda of future meetings?	YES		
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	Do the committees of the Supervisory Board meet as often as necessary to effectively perform their duties and regularly report to the Supervisory Board on their activities?	YES		
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	May Supervisory Board meetings be held without Management Board members present when the Supervisory Board considers this appropriate?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	Do Management Board members refrain from attending meetings at which the Supervisory Board discusses the performance and remuneration of the Management Board and its members?	YES		
4. Supervisory Board and Its Committees/Frequency and Conduct of Meetings	May persons who are not members of the Supervisory Board participate in Supervisory Board meetings only at the invitation of the Supervisory Board?	YES		
4. Supervisory Board and Its Committees/Support	Has the Company appointed a person to perform the duties of Company Secretary?	YES		
4. Supervisory Board and Its Committees/Support	Under the Articles of Association and/or other internal acts, is the Company Secretary responsible for ensuring that the Supervisory Board acts in accordance with its procedures, advising it on governance matters, supporting the Chair of the Supervisory Board, and assisting the Supervisory Board and its committees?	YES		
4. Supervisory Board and Its Committees/Quality and Timeliness of Information	Are all materials required for a meeting of the Supervisory Board or Supervisory Board committee delivered to their members no later than one week before the meeting?	YES		
4. Supervisory Board and Its Committees/Quality and Timeliness of Information	Are the minutes of the Supervisory Board meeting available to all members of the Supervisory Board?	YES		
4. Supervisory Board and Its Committees/Quality and Timeliness of Information	Do the minutes of the Supervisory Board meetings contain information on the voting results, including details on the voting of individual members?	YES		
4. Supervisory Board and Its Committees/Quality and Timeliness of Information	Does the Supervisory Board have the right to receive information/advice from persons outside the Company at the expense of the Company if it deems it necessary for the successful performance of its duties, and the procedure for this is specified in the internal acts of the board with the prior consent of the Supervisory Board?	Partially	For credit institutions, the procedure is prescribed by the Croatian National Bank's Decision on Governance Arrangements.	
4. Supervisory Board and Its Committees/Training and Development	Have all Supervisory Board members received induction training for their role upon appointment?	YES		
4. Supervisory Board and Its Committees/Training and Development	Do all Supervisory Board members receive ongoing training and education to refresh and improve their skills and knowledge?	YES		
4. Supervisory Board and Its Committees/Training and Development	Does the ongoing training of Supervisory Board members cover topics such as business sustainability, responsible business conduct, and achieving gender balance in the Supervisory Board, management, and senior management?	YES		
4. Supervisory Board and Its Committees/Training and Development	Do Supervisory Board members regularly receive news and summaries from management and experts on issues important to the Company and the duties of Supervisory Board members?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Has the Supervisory Board evaluated its effectiveness and composition in the last twelve months?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Has the Supervisory Board assessed the effectiveness and composition of its committees in the last twelve months?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Has the Supervisory Board evaluated the individual performance of its members and members of its committees over the past twelve months?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Was the assessment conducted by the chairman or deputy Chair of the Supervisory Board if the chairman is not independent?	YES		
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Did the evaluation of the Supervisory Board and its committees cover all circumstances referred to in Article 43 of the Code?	NO	For credit institutions, the composition of the Supervisory Board is assessed annually through the regular annual assessment of individual and collective suitability of the Supervisory Board, in accordance with the Croatian National Bank's Decision on the Assessment of Suitability.	
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	By evaluating the Supervisory Board and the Supervisory Board committee, is there a need for improvements in the functioning and preparation of board meetings?	NO	No areas for improvement in the functioning of the committees or the preparation of committee meetings were identified.	
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Does the annual report include a report on the evaluation of the Supervisory Board and its committees?	YES	The Annual Report contains a summary of the results of the Supervisory Board suitability assessment carried out, in accordance with the applicable regulations governing credit institutions, by the Suitability Assessment Committee established within the Bank. Each year, the General Meeting adopts a decision on the individual and collective suitability of the Supervisory Board, and that decision is made publicly available. (2025 Annual Report, p. 64)	https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
4. Supervisory Board and Its Committees/Supervisory Board Evaluation	Does the report on the assessment of the Supervisory Board and its committees include how the assessment was conducted, whether external assessors were engaged and who was consulted during the process, and a summary of the actions that have been or will be taken based on the assessment results?	NO	The Supervisory Board evaluation report, which includes an evaluation of the performance of the Supervisory Board and its committees, does not describe the evaluation methodology, state whether external evaluators were engaged or whom they consulted, or provide a summary of the actions taken or to be taken as a result of the evaluation. The evaluation report on the performance of the Supervisory Board is included in the 2025 Annual Report published on the Bank's website.	
5. Management Board/Responsibilities of the Management Board	Does the Management Board have the responsibilities specified in Article 45 of the Code?	YES		
5. Management Board/Responsibilities of the Management Board	Has the Management Board set a target percentage for representation of the underrepresented gender in senior management to be achieved within the next five years?	NO	A target percentage for representation of the underrepresented sex has been set for the Management Board and the Supervisory Board, but not for senior management.	
5. Management Board/Responsibilities of the Management Board	In the annual report, the set percentage of the representation of the underrepresented gender in senior management is published, together with an explanation of why it was chosen, why the percentage was not achieved if this is the case, the measures the Company is taking to achieve it, and the plan and deadline for achievement, which cannot be longer than five years, and an indication of progress according to the plan?	YES		https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
5. Management Board/Responsibilities of the Management Board	Has the Management Board adopted rules of procedure defining the allocation of responsibilities and the manner of cooperation among Management Board members, including procedures for holding meetings and adopting decisions?	YES		
5. Management Board/Responsibilities of the Management Board	Do the rules of procedure of the Management Board have to be approved by the Supervisory Board?	NO	Article 17 of the Articles of Association authorises the Management Board to adopt its own Rules of Procedure.	
5. Management Board/Responsibilities of the Management Board	In the case of a group, has the management of the parent company ensured effective supervision of the activities of other companies in the group and the existence of appropriate cooperation within the group?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
5. Management Board/Responsibilities of the Management Board	In the case of a group, has the management of the parent company ensured rules governing the scope of operations, responsibilities and reporting procedures at the level of the parent company and subsidiaries, and rules preventing conflicts of interest?	YES		
5. Management Board/Responsibilities of the Management Board	In the case of a group, are information on the system of supervision and cooperation within the group and the intra-group rules of conduct made freely available on the Company's website?	YES		https://www.hpb.hr/
5. Management Board/Responsibilities of the Management Board	In the case where no contract on the management of the Company's affairs has been concluded, has the management of the subsidiary prepared a report on the Company's relations with affiliated companies in the first three months of the business year?	YES		
5. Management Board/Responsibilities of the Management Board	Does the management report of a subsidiary company on relations with related companies contain all legal transactions that the Company undertook in the previous year with the controlling company or its related companies or pursuant to instructions in the interest of those companies, as well as all other actions that it undertook or failed to undertake in the previous year pursuant to instructions from those companies?	YES		
5. Management Board/Responsibilities of the Management Board	Does the management report of a subsidiary company on relations with related companies contain, in legal transactions and other actions, all the information prescribed by Article 497, paragraphs 1 and 2 of the Companies Act?	YES		
5. Management Board/Responsibilities of the Management Board	Has the auditor audited the subsidiary's Management Board report on relations with affiliated companies and submitted the signed auditor's report to the Company's Management Board?	Partially	The auditor audited the dependent company's Management Board report on relations with affiliated companies and submitted its audit report to the Supervisory Board of HPB Invest.	
5. Management Board/Responsibilities of the Management Board	Has the Supervisory Board examined the subsidiary's Management Board report on relations with affiliated companies, taken a position on the audit results and reported on this to the General Meeting in its report submitted to the General Meeting?	Partially	The Supervisory Board of HPB Invest examined the report and reported on it to the General Meeting of HPB Invest in its report on the supervision performed. The Bank's Supervisory Board examined the report as part of the consolidated Annual Report for the HPB Group and, within the consolidated report for the HPB Group, stated its position on the audit findings and reported thereon to the Bank's General Assembly.	
5. Management Board/Composition	Does the Supervisory Board ensure that the Management Board maintains a profile specifying the minimum number of members and the required mix of age, gender, skills, knowledge, education, and professional and practical experience, while ensuring balanced representation of both genders?	YES		
5. Management Board/President	Is the responsibility of the CEO prescribed for all activities from Article 49 of the Code?	YES		
5. Management Board/Limits on Other Appointments	Do the Company's internal regulations stipulate that members of the Management Board must obtain prior consent from the Supervisory Board before accepting appointment to the Management Board or supervisory board of a company that is not part of the same group?	NO	Governed by the Act on the Prevention of Conflicts of Interest.	

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
5. Management Board/Limits on Other Appointments	Do Management Board members hold no more than two positions on management or supervisory boards of companies that are not part of the same group?	YES		
5. Management Board/Management Board Evaluation	Has the Supervisory Board assessed the effectiveness of the arrangements for cooperation between the Supervisory Board and the Management Board in the last 12 months, as well as the adequacy of the support and information it receives from the Management Board?	YES		
5. Management Board/Management Board Evaluation	Are the results of the assessment of the arrangements for cooperation between the Supervisory Board and the Management Board included in the annual report?	YES		https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
5. Management Board/Management Board Evaluation	Has the management assessed its own effectiveness and the effectiveness of individual members at least once a year, applying equal criteria and avoiding any form of discrimination?	YES		
5. Management Board/Management Board Evaluation	Has the management reported to the Supervisory Board the conclusions regarding the assessment of its own effectiveness and the effectiveness of individual members?	YES		
6. Remuneration of Management and Supervisory Board Members/Role of the Remuneration Committee	Does the Remuneration Committee recommend to the Supervisory Board at least every three years a remuneration policy for members of the Management Board, taking into account the amount and structure of remuneration for senior management and employees as a whole, having conducted a prior assessment of the effects of the said policy on gender equality in remuneration for equal work and/or work of equal value?	YES		
6. Remuneration of Management and Supervisory Board Members/Role of the Remuneration Committee	Has the Remuneration Committee recommended to the Supervisory Board the remuneration of Management Board members based on an assessment of the Company's performance and their individual performance, taking into account equal remuneration across genders for equal work and/or work of equal value?	NO	The remuneration of Management Board members is governed by their employment contracts.	
6. Remuneration of Management and Supervisory Board Members/Role of the Remuneration Committee	Has the Remuneration Committee recommended to the Supervisory Board a remuneration policy for Supervisory Board members and carried out a preliminary assessment of its impact on gender equality in remuneration for equal work and/or work of equal value, with the policy then submitted to the General Meeting for approval?	YES		
6. Remuneration of Management and Supervisory Board Members/Role of the Remuneration Committee	Did the Remuneration Committee monitor the amount and structure of remuneration for senior management and employees as a whole, taking into account gender equality in remuneration for equal work and/or work of equal value, and make recommendations to the management on its policies?	YES		
6. Remuneration of Management and Supervisory Board Members/Role of the Remuneration Committee	Has the Remuneration Committee overseen the preparation of the annual remuneration report required by law for approval by the Supervisory Board?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Has 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		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Is the remuneration policy non-discriminatory and aligned with sustainability objectives, and prepared in accordance with the relevant legal requirements?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Does the level of remuneration of Management Board members take into account the agreed strategy, risk appetite, the economic environment in which the Company operates, the achievement of sustainability goals, and the salaries and conditions of employees within the Company?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Does the remuneration policy stipulate that a Management Board member may not dispose of shares awarded as part of remuneration for at least two years from the date on which the shares were awarded?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Does the remuneration policy stipulate that a Management Board member may not exercise share options awarded as part of remuneration for at least two years from the date on which the options were awarded?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Management Board Members	Does the remuneration policy specify the circumstances in which part of a Management Board member's remuneration would be withheld or recovered?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Supervisory Board Members	Does the level of remuneration for the Chair of the Supervisory Board and for other members of the Supervisory Board reflect their time workload and responsibilities, including the time workload and responsibilities in the Supervisory Board committees?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration of Supervisory Board Members	Do the remuneration policy and/or internal acts of the Company prohibit the inclusion of variable elements or other elements related to business performance in the remuneration of the Supervisory Board?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Has the Company adopted a remuneration policy for the Supervisory Board, management and senior management?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Has the Company conducted an assessment of the effects of remuneration policies on gender equality?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Was the remuneration policy approved by shareholders at the General Meeting?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Is the Company's approved remuneration policy available free of charge on the Company's website?	YES		https://www.hpb.hr/
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Is the assessment of the effects of remuneration policies on gender equality available free of charge on the Company's website?	YES		https://www.hpb.hr/

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Does the annual remuneration report include information on the remuneration of each individual member of the Supervisory Board and Management Board, as required by Article 60 of the Code and the Companies Act?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Does the annual remuneration report include information on how the Management Board remuneration policy is determined, the relationship between remuneration and the Company's long-term performance, sustainability and resilience, the structure and parameters used to calculate Management Board remuneration, alignment of Management Board remuneration with that of senior management and the workforce as a whole, and the reasons for any deviation from the Management Board remuneration policy?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Does the annual remuneration report include information on the remuneration of each member of a Supervisory Board committee who is not a member of the Supervisory Board, where applicable?	YES		
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Is the annual remuneration report made freely available on the Company's website?	YES		https://www.hpb.hr/
6. Remuneration of Management and Supervisory Board Members/Remuneration Reporting	Is the auditor's report on the review of the annual remuneration report made freely available on the Company's website?	YES		https://www.hpb.hr/
7. Risk, Internal Control and Audit/Role of the Supervisory Board and Management Board	Has the Management Board, with the prior approval of the Supervisory Board, adopted a risk management policy defining the nature and extent of the risks that the Company must and is willing to assume in order to achieve its long-term strategic objectives?	YES		
7. Risk, Internal Control and Audit/Role of the Supervisory Board and Management Board	Does the risk management policy take sustainability issues into account?	YES		
7. Risk, Internal Control and Audit/Role of the Supervisory Board and Management Board	Does the Company's statute and/or internal acts stipulate the management's responsibility for identifying significant financial, operational and external risks related to the implementation of the Company's strategy and maintaining its activities, and for maintaining an appropriate risk management and internal control system to manage and avoid these risks?	YES		
7. Risk, Internal Control and Audit/Role of the Supervisory Board and Management Board	Does the Company's management regularly report to the Supervisory Board on the status of significant risks?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee oversee the accuracy and completeness of the Company's financial statements, accounting policies, and other official communications related to the Company's financial results?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee oversee the accuracy and completeness of corporate sustainability reports and sustainability reporting policies and other official communications related to the companies' sustainability performance?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee oversee the implementation of tax planning, including the allocation of taxes on profits generated from cross-border activities?	Partially	Operational tax planning and the implementation of tax compliance fall within the remit of the Bank's specialist business functions, while the relevant committees monitor material tax risks, the adequacy of controls and the impact on financial reporting.	
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee oversee the effectiveness of the Company's internal financial controls?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee ensure the adequacy, independence and effectiveness of the external audit function?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee ensure the independence and adequacy of the internal audit function?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Audit Committee oversee the implementation of measures determined as a result of external and internal audits and its own oversight?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Supervisory Board (or a special committee of the Supervisory Board or the Audit Committee) undertake activities to monitor the effectiveness of the Company's overall internal control and risk management system?	YES		
7. Risk, Internal Control and Audit/Role of the Audit Committee	Does the Supervisory Board (or a special committee of the Supervisory Board or the Audit Committee) monitor the implementation of procedures for reporting violations of the law or the Company's internal rules of conduct?	YES		
7. Risk, Internal Control and Audit/Relations with the External Auditor	Does the Audit Committee oversee the process for selecting and appointing the external auditor in accordance with legal requirements and make recommendations to the Supervisory Board on the selection of the external auditor and the terms of appointment?	YES		
7. Risk, Internal Control and Audit/Relations with the External Auditor	Has the Audit Committee approved the external auditor's work plan, which includes the scope and content of the activities to be audited, within the past twelve months?	YES		
7. Risk, Internal Control and Audit/Relations with the External Auditor	Does the Audit Committee meet as necessary with the external auditor to discuss issues identified during the audit and monitor the quality of services provided?	YES		
7. Risk, Internal Control and Audit/Relations with the External Auditor	Does the Audit Committee monitor the independence and objectivity of the external auditor?	YES		
7. Risk, Internal Control and Audit/Relations with the External Auditor	Has the Audit Committee approved a policy on permitted non-audit services provided by the external auditor and oversees the implementation of that policy?	Partially	Any non-audit service contracted from the auditor that is not prohibited under Regulation (EU) No 537/2014 is subject to the prior approval of the Audit Committee.	
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Has the Audit Committee assessed the effectiveness of the risk management and internal control system as a whole at least once a year?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Did the Audit Committee make recommendations to the Supervisory Board and the Company's management regarding the effectiveness of risk management and the internal control system, if necessary?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Did the Company state in its annual report how the Supervisory Board conducted oversight regarding the effectiveness of risk management and the internal control system?	YES		https://www.hpb.hr/
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Did the Company describe in its annual report which significant internal controls were ineffective and the measures and activities that were undertaken or proposed to improve them?	NO		https://www.hpb.hr/UserDocsImages/Financijska-izvjesca/26/Godisnji%20izvjestaj%202025.pdf?vel=17130824
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Does the Company maintain an effective risk management system that ensures reliable risk identification, measurement, response, reporting and monitoring?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Does the risk management system cover all risks that the Company faces or may face, including climate and environmental risks, health crises, disruptions in supply chains, geopolitical tensions, tax risks, risks related to cybersecurity and the application of digital technologies, as well as financial and operational risks?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Has the Company defined clear internal responsibilities for maintaining the risk management system and a clear procedure for maintaining contact between responsible persons and the Audit Committee?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Has the Company established an internal audit function responsible for monitoring the effectiveness of the internal control system, including risk management?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Has the Audit Committee approved the internal audit plan in the last twelve months?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Has the Audit Committee received reports from the internal auditor and monitored the implementation of the internal auditor's recommendations?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	Is the Audit Committee obliged to recommend to the Supervisory Board the appointment or dismissal of the head of the internal audit function?	YES		
7. Risk, Internal Control and Audit/Risk Management and Internal Control	If the Company does not have an internal audit function, has the Audit Committee assessed the need for such a function as part of its assessment of the internal control system once in the last twelve months?	NO	The Bank has an internal audit function.	
7. Risk, Internal Control and Audit/Whistleblowing	Has the Management Board, with the prior consent of the Supervisory Board, adopted procedures for reporting violations of the law, internal company rules or unethical behaviour, including cases where there is suspicion of a violation or the possibility of one occurring?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Does the procedure ensure that employees or external stakeholders do not suffer adverse consequences for reporting suspected misconduct and that the whistleblower's identity remains protected?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Are the procedures in line with regulations on the protection of whistleblowers, gender equality, protection from all forms of harassment and combating discrimination?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
7. Risk, Internal Control and Audit/Whistleblowing	Is a detailed description of the procedure for reporting violations of the law, internal company rules or unethical behaviour available free of charge on the Company's website?	YES		https://www.hpb.hr/hr/antikorupcijski-program-5268/5268
7. Risk, Internal Control and Audit/Whistleblowing	Has the Management Board appointed a person responsible for handling reported irregularities?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Do the Company's Articles of Association and/or internal acts provide for the management's duty to immediately report to the Supervisory Board all observed irregularities, agree on measures that must be implemented, and report to the Supervisory Board on the results of the implemented measures?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Do the Company's Articles of Association and/or internal acts provide for the management's duty to inform the person reporting irregularities about the results of the measures taken, unless otherwise provided for by the relevant regulation?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Do the Company's Articles of Association and/or internal acts provide for the Management Board's duty to ensure protection of the whistleblower's identity and protection against possible retaliation?	YES		
7. Risk, Internal Control and Audit/Whistleblowing	Has the Audit Committee assessed the effectiveness of the whistleblowing procedure and its implementation at least once a year?	Partially	Under specific regulations for credit institutions, the Audit Committee is not responsible for assessing the effectiveness of the procedure for reporting irregularities or its implementation. Its role and responsibilities are in Article 12 of the Rules on the Procedure for Reporting Irregularities and comprise verifying facts and evidence stated in a report, overseeing the process of establishing all disputed facts, and proposing measures once the fact-finding process is done. No reports of irregularities were received in 2025; so there was no need to carry out reviews or controls or to impose any measures.	
8. Disclosure and Transparency/Use of the Company Website	Is all information that the Company is required to disclose under the law, listing rules, the Code and its own Articles of Association made freely available on the Company's website?	YES		
8. Disclosure and Transparency/Use of the Company Website	Are the Company's websites easily accessible, accessible to end users, and clear and easy to find information?	YES		
8. Disclosure and Transparency/Use of the Company Website	Is the Company's annual report available on the Company's website?	YES		
8. Disclosure and Transparency/Use of the Company Website	Is the half-yearly and quarterly report and other financial information required to be published available on the Company's website?	YES		https://www.hpb.hr/hr/financijski-izvjestaji-i-ostale-informacije-za-investitore/322
8. Disclosure and Transparency/Use of the Company Website	Is sustainability-related information available on the Company's website that could reasonably be expected to influence an investor's assessment of the Company's value or their investment or voting decisions?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
8. Disclosure and Transparency/Use of the Company Website	Is information available on the Company's website about the rules of operation, 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?	Partially	Information on the rules governing the operation of the Supervisory Board and its committees and of the Bank's Management Board, including their respective Rules of Procedure, is not publicly available.	
8. Disclosure and Transparency/Use of the Company Website	Are the Company's Articles of Association and other internal documents in accordance with this Code available on the Company's website?	Partially	The Rules of Procedure of the Supervisory Board and its committees are not publicly available. The calendar of events has been published, but it does not include the dates of General Assembly.	
8. Disclosure and Transparency/Use of the Company Website	Are the Company's policies on social and environmental impact, human rights, including children's rights, inclusive work environment, bribery and corruption, and discrimination available on the Company's website?	YES		https://www.hpb.hr/hr/transparentno-korporativno-upravljanje/7626
8. Disclosure and Transparency/Use of the Company Website	Are the Company's internal rules and the method of reporting irregularities available on the Company's website?	YES		https://www.hpb.hr/hr/transparentno-korporativno-upravljanje/7626
8. Disclosure and Transparency/Use of the Company Website	Is an organisational chart showing in detail the Company's position within the group, where the Company is part of a group, including intra-group policies, available on the Company's website?	YES		https://www.hpb.hr/hr/hpb-grupa/340
8. Disclosure and Transparency/Use of the Company Website	Is information on mutual shareholdings where the Company is involved available on the Company's website?	NO	The Bank is listed on the Zagreb Stock Exchange, and information on trading in its shares is available on the Zagreb Stock Exchange website.	
8. Disclosure and Transparency/Use of the Company Website	Is there a report on information on profit tax available on the Company's website?	YES		https://www.hpb.hr/
8. Disclosure and Transparency/Use of the Company Website	Is a report on transactions with related parties available on the Company's website?	NO	Pursuant to Articles 497 and 498 of the Companies Act, this report must be prepared by dependent companies. As HPB is not a dependent company, it is not required to prepare the report concerned.	
8. Disclosure and Transparency/Use of the Company Website	Is a report on the Company's relations with affiliated companies available on the Company's website?	NO	Pursuant to Articles 497 and 498 of the Companies Act, this report must be prepared by dependent companies. As HPB is not a dependent company, it is not required to prepare the report concerned.	
8. Disclosure and Transparency/Use of the Company Website	Is information on shareholder agreements, including the parties to the agreement, its principal purpose and how that purpose is implemented, as prescribed by law, available on the Company's website?	NO	HPB has no such agreements.	
8. Disclosure and Transparency/Use of the Company Website	Are details available on the Company's website about changes in shareholdings of members of the Supervisory Board and management board, other persons performing managerial duties and persons closely associated with them, who must be reported under applicable laws and other regulations, and transactions with related parties?	Partially	The Annual Report states that neither the Bank's Management Board (page 71) nor the members of the Supervisory Board (page 63) hold any shares in the Bank.	
8. Disclosure and Transparency/Use of the Company Website	Are the remuneration policy for members of the Supervisory Board, Management Board and senior management, and the annual remuneration report, available on the Company's website?	Partially	This information is not available for senior management.	
8. Disclosure and Transparency/Use of the Company Website	Is the dividend policy available on the Company's website?	NO	HPB does not have a dividend policy.	
8. Disclosure and Transparency/Use of the Company Website	Is the risk management policy available on the Company's website, including information on the nature and effectiveness of the related due diligence procedures and measures?	YES		https://www.hpb.hr/hr/javno-objavljene-informacije/326

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
8. Disclosure and Transparency/Use of the Company Website	Is a calendar of events for the next twelve months available on the Company's website, including the dates of the General Meeting, publication of financial results, dividend payments and investor conferences?	Partially	The calendar of events available on the website includes the dates on which financial results are to be published.	
8. Disclosure and Transparency/Use of the Company Website	Are all materials relating to General Meeting sessions, including the resolutions adopted at those meetings, available on the Company's website?	YES		https://www.hpb.hr/hr/glavna-skupstina/324
8. Disclosure and Transparency/Use of the Company Website	Are the names and contact details of the persons responsible for investor relations available on the Company's website?	YES		https://www.hpb.hr/hr/odnosi-s-investitorima-320/320
8. Disclosure and Transparency/Use of the Company Website	Has the Company ensured that the information on the website is up-to-date and published within the deadlines prescribed by law and regulations?	YES		
8. Disclosure and Transparency/Use of the Company Website	Is all information on the Company's website made freely and unconditionally available in Croatian?	YES		
8. Disclosure and Transparency/Use of the Company Website	Is all information on the Company's website made freely and unconditionally available in English?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain records of the number of meetings of the Supervisory Board and Supervisory Board committees held and the presence of each member at those meetings?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain information on all shares and other financial instruments of the Company held by members of the Supervisory Board and management board and senior management, for which there is an obligation to report under applicable laws and regulations, and in other companies whose operations are in competition with the Company's operations?	Partially	The Annual Report states that neither the Bank's Management Board (page 71) nor the members of the Supervisory Board (page 63) hold any shares in the Bank.	
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain information on all concluded contracts and agreements between members of the management or supervisory board and the Company (or persons related to any party)?	NO	The Annual Report (page 335) discloses the Bank's total exposure to related parties comprising key shareholders and key management personnel.	
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain the results of the assessment of the Supervisory Board regarding its effectiveness and the effectiveness of the arrangements for cooperation with management?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain a report on the work of each committee of the Supervisory Board, including data on the number of meetings held, board members and records of their attendance?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain information on shareholder agreements, including the parties to the agreements, their principal purpose and how that purpose is implemented, as prescribed by law?	NO	There are no such agreements with shareholders	

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain a report on gender equality and compliance with the requirements concerning balanced representation of both genders on the Supervisory Board, Management Board and in senior management, with an explanation where those requirements are not met?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report contain information on the fulfilment of the requirements regarding the independence of the members of the Supervisory Board and the criteria for their independence?	YES		
8. Disclosure and Transparency/Annual Report	Does the Company's annual report include a description of the sustainability-related objectives established by the Company and a report on their achievement?	YES		
8. Disclosure and Transparency/Annual Report	Does the annual report include information on issued bonds, debt agreements concluded, including information on 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 and shareholders or require changes in the Company's operations, as well as information on the probability of such events occurring?	NO	The Bank had no such obligations as at year-end 2025.	
8. Disclosure and Transparency/Annual Report	Is the report on the application of the corporate governance code included in the Company's annual report?	YES		
8. Disclosure and Transparency/Annual Report	Does the report on the application of the corporate governance code contain everything prescribed by the Accounting Act?	YES		
8. Disclosure and Transparency/Annual Report	Has the Company ensured that all shareholders, regardless of the number or type of shares they hold, have equal access to information about the Company and how they can exercise and protect their rights?	YES		
9. Shareholders and the General Meeting/Relations with Shareholders	Does the Company have effective formal mechanisms that allow minority shareholders to ask questions directly to the chairman of the Management Board and the Chair of the Supervisory Board?	YES		
9. Shareholders and the General Meeting/Relations with Shareholders	Is information on formal mechanisms that enable minority shareholders to ask questions directly to the chairman of the Management Board and the Chair of the Supervisory Board available free of charge on the Company's website?	YES		https://www.hpb.hr/hr/glavna-skupstina/324
9. Shareholders and the General Meeting/Relations with Shareholders	Has the Company appointed an investor relations contact person for all shareholders whose duties include responding promptly to requests for information?	YES		
9. Shareholders and the General Meeting/General Meeting	Do the Company's Articles of Association and/or internal acts of the Company in any way restrict the ability of shareholders to convene a General Meeting, to participate in it, or to add items to the agenda?	YES		

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
9. Shareholders and the General Meeting/General Meeting	Do the Company's Articles of Association and/or internal company documents allow shareholders the possibility of exercising their voting rights through a proxy without restrictions?	YES		
9. Shareholders and the General Meeting/General Meeting	Do the Company's Articles of Association and/or internal company documents allow shareholders the opportunity to exercise their voting rights via electronic communication without restrictions?	YES		
9. Shareholders and the General Meeting/General Meeting	Is an explanation of other ways in which shareholders may exercise their voting rights provided in the General Meeting documents?	YES		
9. Shareholders and the General Meeting/General Meeting	Does the Company's statute or management decision allow for the General Meeting to be held in a hybrid format?	YES		
9. Shareholders and the General Meeting/General Meeting	Does the Company's statute or the Management Board's decision allow shareholders who do not participate in the work of the General Meeting to cast their votes in writing or via electronic communication (correspondence voting) after the announcement of the invitation to the General Meeting, and before it is held?	YES		
9. Shareholders and the General Meeting/General Meeting	Was the notice of the General Meeting published no later than 30 days before the date of its holding?	YES		
9. Shareholders and the General Meeting/General Meeting	Are the agenda, proposed resolutions and all other materials required for the General Meeting made freely available on the Company's website?	YES		https://www.hpb.hr/hr/glavna-skupstina/324
9. Shareholders and the General Meeting/General Meeting	Are all documents available in Croatian and English?	YES		
9. Shareholders and the General Meeting/General Meeting	Has the Company published on its website how shareholders may participate in the General Meeting and exercise their voting rights, particularly where electronic communication is used, and how the Company has ensured compliance with the statutory requirements for the use of electronic communication?	YES		
9. Shareholders and the General Meeting/General Meeting	Were the chairman and deputy Chair of the Supervisory Board, the chairs of the Supervisory Board committees and all members of the Management Board present at the General Meeting in the past twelve months?	Partially	The only relevant chairperson who did not attend either of the two General Assemblies held during the past 12 months was the Chair of the Risk Committee.	
9. Shareholders and the General Meeting/General Meeting	Was the external auditor present at the General Meeting where the financial statements were presented?	YES		
9. Shareholders and the General Meeting/General Meeting	Has the Company made the resolutions of the General Meeting freely available on its website?	YES		https://www.hpb.hr/hr/glavna-skupstina/324
9. Shareholders and the General Meeting/General Meeting	Has the Company made available, free of charge, on its website, within 30 days of the date of the General Meeting, answers to questions asked at the General Meeting?	YES		https://www.hpb.hr/hr/glavna-skupstina/324

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management Board agreed and adopted policies regarding the assessment of the impact of the Company's activities on the environment and the community and the management of related risks, throughout the entire value chain?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management agreed and adopted policies regarding the preservation of human, children's and workers' rights, especially persons with disabilities, throughout the value chain?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management agreed and adopted policies regarding the creation of an inclusive work environment, especially for persons with disabilities?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management agreed and adopted policies regarding achieving work-life balance for employees?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management Board agreed and adopted policies regarding ensuring equal remuneration for different genders for equal work and/or work of equal value?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management agreed and adopted policies regarding the prevention and sanctioning of all forms of discrimination, especially on the basis of gender and disability, and the protection of whistleblowers?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management Board agreed and adopted policies regarding the prevention and sanctioning of bribery and corruption and the protection of whistleblowers?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management Board agreed and adopted policies regarding tax planning that ensure payment of the majority of taxes in the countries where activities are carried out and income is generated?	Partially	The Management Board and the supervisory bodies monitor the tax compliance and tax risk framework, including cross-border activities. The Bank applies the principle that its tax position should be aligned with its business activities and applicable regulations, while the specific tax treatment of individual transactions is determined in accordance with the relevant rules and the circumstances of each case.	
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and Management Board agreed and adopted policies regarding communication between the Company and its main stakeholders?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and the Management Board agreed and adopted policies regarding the implementation of due diligence procedures and measures in the Company, its subsidiaries and, where applicable, its direct and indirect business partners?	YES		https://www.hpb.hr/hr/odrzivo-poslovanje-7616/7616

		ANSWER	EXPLANATION	LINK TO COMPANY WEBSITE
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	When agreeing and adopting the policies specified in Article 88 of the Code, were the Supervisory Board and the Management Board guided by the recommendations for responsible business conduct as prescribed in the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the applicable OECD Implementation Guidelines for Due Diligence on Responsible Business Conduct?	Partially	When coordinating and adopting the policies referred to in Article 88 of the Code, the Supervisory and Management Board were guided by the principles of responsible business conduct, sustainability, transparency, risk management and protection of stakeholder interests, in alignment with the fundamental principles of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Although HPB is not an entity primarily addressed by those Guidelines, the Bank has implemented to a significant extent the principles they promote.	
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Are all policies referred to in Article 88 of the Code available free of charge on the Company's website?	YES		
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	Have the Supervisory Board and the Management Board ensured periodic monitoring of the implementation and effectiveness of all policies they have agreed and adopted in accordance with Article 88 of the Code?	YES		
10. Stakeholders, Sustainability and Resilience/Responsible Business Conduct	When management requests prior approval of decisions from the Supervisory Board, do the supporting documents explain how the recommended action is consistent with the policies set out in Article 88 of the Code?	YES		
10. Stakeholders, Sustainability and Resilience/Stakeholder Engagement	Have the Supervisory Board and Management jointly identified who they consider to be key stakeholders in relation to the Company?	YES		
10. Stakeholders, Sustainability and Resilience/Stakeholder Engagement	Has the management ensured that there are effective mechanisms in place for regular interaction with key stakeholders, as well as for informing the Supervisory Board about the results of these communications?	YES		
10. Stakeholders, Sustainability and Resilience/Stakeholder Engagement	Is the Supervisory Board authorised, with prior notice to the President of the Management Board, to organise meetings with external stakeholders when it considers this necessary?	Partially	The Supervisory Board communicates with the Croatian National Bank pursuant to the Credit Institutions Act.	
10. Stakeholders, Sustainability and Resilience/Stakeholder Engagement	Do the terms of reference of each Supervisory Board committee clearly specify the purposes for which the chairman of the board may communicate directly with stakeholders and the procedure to be followed in such cases?	Partially	The Audit Committee communicates with the external auditors pursuant to the Audit Act.	
10. Stakeholders, Sustainability and Resilience/Internal Training	Does the Company organise continuous training for the Supervisory Board, management and all employees regarding gender equality, inclusion of persons with disabilities and children's rights, especially when the structure of employees changes significantly or when there are significant changes to regulations relating to these areas?	YES		
10. Stakeholders, Sustainability and Resilience/Internal Training	Are the trainings organised in cooperation with competent institutions, civil society organisations or experts who deal with these issues in the field of employment and labour?	Partially	Training is generally organised internally.	