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Valamar Riviera d.d. - Compliance Questionnaire for 2025

CHAPTER	PROVISION	QUESTION	ANSWER	EXPLANATION	LINK TO THE COMPANY'S WEBSITE
1	Leadership/Cooperation	The articles of association and/or other internal regulations clearly set out the authorities of the supervisory board and management board, in accordance with the relevant legislation and the arrangements by which the management board and supervisory board cooperate?	YES		
1	Leadership/Cooperation	The articles of association (and/or other internal regulations) are freely available on the company's website?	YES		https://valamar-riviera.com/media/539327/articles-of-association-consolidated-text-23042026.pdf
1	Leadership/Cooperation	The supervisory board has adopted a resolution setting out the categories of decisions and legal transactions that require the prior approval of the supervisory board and regarding which the management board must consult the supervisory board before taking a decision?	YES		
1	Leadership/Cooperation	A summary of the resolution is freely available on the company's website?	YES		https://valamar-riviera.com/media/539200/excerpt-from-the-management-board-and-the-supervisory-board-rules-of-procedure.pdf
1	Leadership/Cooperation	\nThe articles of association and/or internal regulations of the company provide for the prior approval of the supervisory board for taking major decisions affecting the company's strategy, expenditure, risk exposure and reputation?	YES		
1	Leadership/Cooperation	The articles of association and/or internal regulations of the company stipulate that the supervisory board and its committees have timely access to documents, premises, as well as senior management and employees when necessary for the performance of their duties?	YES		
1	Leadership/Cooperation	The management board reported to the supervisory board at regular intervals on the company's operational performance, financial situation, its major financial and other risks, the company's resilience, and the results of its engagement with shareholders and other stakeholders?	YES		
1	Leadership/Cooperation	The management board and supervisory board agreed on the content, format and frequency of these reports?	YES		
1	Leadership/Cooperation	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	The supervisory board has approved a code of conduct (or another internal regulation) establishing 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		
1	Leadership/Rules of Conduct	The code of conduct (or another internal regulation) contains provisions ensuring an inclusive work environment, equal opportunities for different genders and the prohibition of any form of discrimination, as well as the rules of conduct and the measures to be taken in the event of their breach?	YES		
1	Leadership/Rules of Conduct	The code of conduct (or another internal regulation) is freely available on the company's website?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
1	Leadership/Rules of Conduct	The supervisory board oversees the implementation and keeps under review the effectiveness of the code of conduct (or another internal regulation)?	YES		
1	Leadership/Rules of Conduct	The code of conduct (and/or another internal regulation) took into account 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?	NO	The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct will be taken into account when the Company's Code of Business Conduct is amended for future periods, to the extent that they can be applied to the Company as a Croatian resident.	
2	Duties of management and supervisory board members/Conflicts of interest	Members of the management and supervisory boards are prohibited from participating in decisions where they have a conflict of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	The company has adopted a policy for managing conflicts of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	The supervisory board gave prior approval to the policy for managing conflicts of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	The policy for managing conflicts of interest is freely available on the company's website?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
2	Duties of management and supervisory board members/Conflicts of interest	Supervisory board members are required to inform the entire supervisory board that they have an existing or potential conflict of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	Management board members are required to inform the president of the supervisory board and the other management board members of an existing or potential conflict of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	The supervisory board is required to keep a record of all notifications relating to an existing or potential conflict of interest, including a description of the actions taken and the outcome of the actions taken as regards each existing or potential conflict of interest?	YES		
2	Duties of management and supervisory board members/Conflicts of interest	Members of the management and supervisory boards are required to inform the president 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 inform the deputy president of the supervisory board where the president of the supervisory board is concerned?	YES		
2	Duties of management and supervisory board members/Competition ban	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		
2	Duties of management and supervisory board members/Competition ban	Members of the supervisory and management boards are not members of the management or supervisory board of companies that engage in activities that compete with the company's business?	YES		
2	Duties of management and supervisory board members/Competition ban	Members of the supervisory and management boards do not hold significant holdings in companies that compete with the company's business?	YES		
2	Duties of management and supervisory board members/Competition ban	Members of the management and supervisory boards who hold holdings in companies with which the company competes have informed the company secretary of such holdings?	Partially	In accordance with the Company's acts, management and supervisory board members inform the Company secretary of all holdings in other companies exceeding 5%. The Company is not aware of any other possible holdings.	
2	Duties of management and supervisory board members/Competition ban	Details of the holdings held by the supervisory and management boards in companies that compete with the company's business are freely available on the company's website?	NO	In 2025 the company did not disclose on its website information on the shares and holdings that management and supervisory board members hold in other companies that may be considered competitors, but the company will consider the conditions for disclosing such information in relation to future periods.	
2	Duties of management and supervisory board members/Related party transactions	No transaction between members of the management or supervisory boards and the company (or persons related to either party) may be entered into without the prior approval of the supervisory board?	YES		
2	Duties of management and supervisory board members/Related party transactions	The fair value of each material transaction, as defined by law, must be confirmed by an independent expert prior to each such transaction?	Partially	Material transactions that do not go beyond the ordinary services within the Company's scope of activity (customary accommodation, food, beverage and other hospitality services) are not assessed by independent experts. Other material transactions are assessed in the cases and under the conditions in accordance with the relevant provisions of the Companies Act for all related party transactions.	

2	Duties of management and supervisory board members/Related party transactions	The independent expert's report on the fair value of each material transaction must be freely available on the company's website?	Partially	Material transactions that do not go beyond the ordinary services within the Company's scope of activity (customary accommodation, food, beverage and other hospitality services) are not assessed by independent experts. Other material transactions are assessed in the cases and under the conditions in accordance with the relevant provisions of the Companies Act for all related party transactions.	
2	Duties of management and supervisory board members/Related party transactions	Where the supervisory board has appointed a special committee in accordance with the law or authorised the audit committee to decide on prior approval of related party transactions, the members of such committee meet the independence requirements laid down for supervisory board members?	NO	The supervisory board has not appointed a special committee to decide on granting prior approval for entering into related party transactions. Such decisions are taken exclusively by the supervisory board, while its committees may make recommendations and proposals to it and prepare decisions.	
2	Duties of management and supervisory board members/Related party transactions	Where the supervisory board has appointed a special committee in accordance with the law or authorised the audit committee to decide on prior approval of related party transactions, the members of such committee are independent of the persons and transactions subject to the prior approval?	NO	The supervisory board has not appointed a special committee to decide on granting prior approval for entering into related party transactions. Such decisions are taken exclusively by the supervisory board, while its committees may make recommendations and proposals to it and prepare decisions.	
2	Duties of management and supervisory board members/Related party transactions	The company has adopted procedures for approving and publicly reporting transactions between members of the management or supervisory boards and the company (or persons related to either party)?	YES		
2	Duties of management and supervisory board members/Related party transactions	The audit committee reviews the effectiveness of these procedures once a year?	YES		
2	Duties of management and supervisory board members/Related party transactions	The company discloses without delay on its website information on related party transactions that require the prior approval of the supervisory board, for the company's transactions and for the transactions of a subsidiary with the parent company's related parties?	Partially	The company discloses information on related party transactions in cases involving material legal transactions. There were no such cases in 2025.	
2	Duties of management and supervisory board members/Related party transactions	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		
2	Duties of management and supervisory board members/Related party transactions	Such notice of transactions is available to the public for at least five years on the company's website?	YES		https://valamar-riviera.com/media/492916/notice-of-significant-legal-transactions-1-91-24.pdf
2	Duties of management and supervisory board members/Related party transactions	The management board prepares a report on related party transactions once a year, with the content prescribed by the Companies Act?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
2	Duties of management and supervisory board members/Related party transactions	The auditor has audited the report on related party transactions and submitted its signed report to the company's management board?	YES		
2	Duties of management and supervisory board members/Related party transactions	The supervisory board examined the report on related party transactions, took a position on the results of the audit, and reported on this to the general meeting in its report submitted to the general meeting?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
3	Appointment of management and supervisory board members/Role of the supervisory board	The supervisory board is responsible for appointing and dismissing members of the management board and for recommending candidates for the supervisory board to the general meeting?	YES		
3	Appointment of management and supervisory board members/Role of the supervisory board	The supervisory board has adopted formal and transparent procedures for appointment to the management and supervisory boards and for the selection of senior management?	Partially	The procedures relate to appointment to the management board and supervisory board, but not to senior management, since this is decided by the management board.	
3	Appointment of management and supervisory board members/Role of the supervisory board	The supervisory board has adopted a succession plan?	YES		
3	Appointment of management and supervisory board members/Role of the supervisory board	The 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 a person of the underrepresented gender?	YES		
3	Appointment of management and supervisory board members/Role of the supervisory board	A prior assessment of the impact of the procedures for appointment to the management and supervisory boards and for the selection of senior management, as well as of the succession plan, on gender equality was carried out?	NO	No such activities were carried out during 2025.	
3	Appointment of management and supervisory board members/Role of the supervisory board	The prior assessment of the impact of the procedures for appointment to the management and supervisory boards and for the selection of senior management, as well as of the succession plan, on gender equality was published free of charge on the company's website?	NO	No such activities were carried out during 2025.	
3	Appointment of management and supervisory board members/Role of the supervisory board	Representation of at least 40% of members of the underrepresented gender on the supervisory board, or on the supervisory board and management board together, is ensured?	NO	No such activities were carried out during 2025.	
3	Appointment of management and supervisory board members/Role of the supervisory board	If representation of at least 40% of members of the underrepresented gender has not been achieved, the company has taken measures to achieve the prescribed representation and adopted a plan and deadline for achieving it that may not exceed two years from the occurrence of the gender imbalance?	NO	No such activities were carried out during 2025.	
3	Appointment of management and supervisory board members/Role of the supervisory board	The company publishes in its annual report all the measures it takes, the plan and deadline for achieving the prescribed representation of the underrepresented gender, together with an explanation as to why the percentage has not been reached?	NO	No such activities were carried out during 2025.	
3	Appointment of management and supervisory board members/Role of the nomination committee	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 achieves a balanced representation of both genders?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	The nomination committee developed role and candidate descriptions for each vacancy consistent with the profile of the management or supervisory board, and identified and recommended suitable candidates to the supervisory board?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	When seeking independent candidates for the supervisory board, the nomination committee confirmed that the candidates are independent and on the basis of which criteria (as defined in Appendix A)?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	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 supervisory board or management board?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	The nomination committee monitored progress in achieving the target percentage of female members of the management and supervisory boards and of senior management?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	The nomination committee monitored the policy of the management board on the selection and appointment of senior management?	YES		
3	Appointment of management and supervisory board members/Role of the nomination committee	The nomination committee monitored the internal evaluation and the survey on workers' perceptions of gender equality and equal opportunities in the company?	Partially	The nomination committee does not oversee the processes but is informed of the results of the internal evaluation and the results of the survey.	
3	Appointment of management and supervisory board members/Election of supervisory board members by the general meeting	When proposing candidates for the supervisory board to the general meeting, the company makes all the information from Article 19 of the Code freely available on its website among the general meeting materials?	YES		https://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf
3	Appointment of management and supervisory board members/Election of supervisory board members by the general meeting	The proposal for the election of supervisory board members must contain, for each proposed member, information on whether they are independent within the meaning 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://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf
3	Appointment of management and supervisory board members/Election of supervisory board members by the general meeting	In the case where a current supervisory board member is proposed, the general meeting materials also contain all the information from Article 20 of the Code?	YES		https://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf
3	Appointment of management and supervisory board members/Election of supervisory board members by the general meeting	The information from Articles 19 and 20 of the Code is freely available on the company's website also in the case where a workforce representative or another supervisory board member not elected by shareholders at the general meeting is appointed?	YES		https://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf

4	Supervisory board and its committees/Responsibilities of the supervisory board	The tasks of the supervisory board include: appointing and dismissing members of the management board and 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, as well as how it engages with shareholders and other stakeholders?	YES		
4	Supervisory board and its committees/Responsibilities of the supervisory board	The tasks of the supervisory board also include ensuring at least 40% representation of the underrepresented gender on the supervisory board or on the supervisory board and management board together?	YES		
4	Supervisory board and its committees/Composition of the supervisory board	The supervisory board has 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 required on the supervisory board?	YES		
4	Supervisory board and its committees/Composition of the supervisory board	The supervisory board includes members of different genders, ages, backgrounds and experience in order to ensure a diversity of perspectives in decision-making and a balanced representation of both genders?	YES		
4	Supervisory board and its committees/Composition of the supervisory board	The majority of supervisory board members are independent in accordance with the definition in Appendix A of the Code?	NO	Three members of the Supervisory Board are independent.	
4	Supervisory board and its committees/Composition of the supervisory board	The president or deputy president of the supervisory board is independent?	NO	Three members of the Supervisory Board are independent. The president and deputy presidents of the supervisory board are persons with diverse skills, knowledge and education, as well as professional and practical experience.	
4	Supervisory board and its committees/Composition of the supervisory board	If the majority of supervisory board members is not independent, the supervisory board has 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 was not independent?	NO	Supervisory Board members are selected on the basis of their skills, knowledge and education, as well as professional and practical experience.	
4	Supervisory board and its committees/Composition of the supervisory board	The company publishes in its annual report all the measures it takes to achieve the independence of the supervisory board, the plan and deadline for achieving independence, together with an explanation as to why independence has not been achieved?	NO	Supervisory Board members are selected on the basis of their skills, knowledge and education, as well as professional and practical experience.	
4	Supervisory board and its committees/The president	The president of the supervisory board has the tasks set out in Article 26 of the Code?	YES		
4	4. Supervisory board and its committees/Board committees	The supervisory board has established a nomination committee?	YES		
4	4. Supervisory board and its committees/Board committees	The supervisory board has established a remuneration committee?	YES		
4	4. Supervisory board and its committees/Board committees	The supervisory board has established an audit committee?	YES		
4	4. Supervisory board and its committees/Board committees	The supervisory board has stipulated the mandate and activities of each of its committees?	YES		
4	4. Supervisory board and its committees/Board committees	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		
4	4. Supervisory board and its committees/Board committees	Each supervisory board committee has at least three members?	YES		
4	4. Supervisory board and its committees/Board committees	The majority of the members of each supervisory board committee is independent in accordance with the definition in Appendix A of the Code?	Partially	Two members of the Audit Committee and one member of the Investment Committee are independent.	
4	4. Supervisory board and its committees/Board committees	Members of the management board are prohibited from being members of supervisory board committees?	YES		
4	4. Supervisory board and its committees/Board committees	The independence of the supervisory board committees is achieved through independent supervisory board members?	Partially	Two members of the Audit Committee and one member of the Investment Committee are independent.	
4	4. Supervisory board and its committees/Board committees	The terms of reference of each supervisory board committee are freely available on the company's website?	YES		https://valamar-riviera.com/media/539200/excerpt-from-the-management-board-and-the-supervisory-board-rules-of-procedure.pdf
4	4. Supervisory board and its committees/Board committees	The company includes in its annual report a report on the work of each supervisory board committee, including information on the number of meetings held, the members of the committee, and the independence of each committee member?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
4	Supervisory board and its committees/Time commitment	The minimum expected time commitment of each supervisory board member is specified at the time of their appointment?	YES		
4	Supervisory board and its committees/Time commitment	The company's annual report publishes a record of each supervisory board member's attendance at meetings of the supervisory board and its committees?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
4	Supervisory board and its committees/Time commitment	The articles of association and/or internal regulations of the company provide for the obligation of supervisory board members to inform the company secretary of their membership of the supervisory or management boards of other companies?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	Supervisory board meetings are held at least every three months?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	The supervisory board has adopted a work plan that includes the timing and agenda of future meetings?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	The supervisory board committees meet as often as necessary to discharge their duties effectively and report regularly to the supervisory board on their activities?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	Supervisory board meetings may be held without the participation of management board members where the supervisory board considers it appropriate?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	Members of the management board do not attend meetings where the supervisory board discusses the performance and remuneration of the management board and its members?	YES		
4	Supervisory board and its committees/Frequency and format of meetings	Persons who are not committee members may participate in committee meetings only at the invitation of the committee?	YES		
4	Supervisory board and its committees/Support	The company has designated an individual to perform the activities of a company secretary?	YES		
4	Supervisory board and its committees/Support	In accordance with the articles of association (or other internal regulations), the company secretary is responsible for ensuring that the supervisory board complies with its procedures, for 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	All materials required for a meeting of the supervisory board or a supervisory board committee are provided to its members at least one week before the meeting?	YES		
4	Supervisory board and its committees/Quality and timeliness of information	The minutes of a supervisory board meeting are available to all supervisory board members?	YES		
4	Supervisory board and its committees/Quality and timeliness of information	The minutes of supervisory board meetings contain information on the voting results, including details of how individual members voted?	YES		
4	Supervisory board and its committees/Quality and timeliness of information	The supervisory board is entitled to receive information/advice from parties outside the company at the company's expense if it considers it necessary to carry out its duties effectively, and the procedure for doing so is specified in the internal regulations adopted by the management board with the prior approval of the supervisory board?	YES		
4	Supervisory board and its committees/Training and development	All supervisory board members received induction training into their role on appointment?	YES		
4	Supervisory board and its committees/Training and development	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	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 board, management board and in senior management?	Partially	Training in 2025 covered the topics of transparency, handling of inside information, corporate governance and responsible business conduct.	
4	Supervisory board and its committees/Training and development	Supervisory board members regularly receive updates and briefings from the management board and experts on matters relevant to the company and to the duties of supervisory board members?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The supervisory board evaluated its effectiveness and composition in the past twelve months?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The supervisory board evaluated the effectiveness and composition of its committees in the past twelve months?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The supervisory board evaluated the individual performance of its members and of the members of its committees in the past twelve months?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The evaluation was led by the president, or by the deputy president of the supervisory board if the president is not independent?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The evaluation of the supervisory board and its committees included an assessment of all the circumstances set out in Article 43 of the Code?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The evaluation of the supervisory board and its committees identifies whether there is a need for improvements in the operation and preparation of committee meetings?	YES		
4	Supervisory board and its committees/Supervisory board evaluation	The annual report includes a report on the evaluation of the supervisory board and its committees?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
4	Supervisory board and its committees/Supervisory board evaluation	The report on the evaluation of the supervisory board and its committees states how the evaluation was carried out, whether external assessors were engaged and who was consulted during the process, and summarises the actions that have been or will be taken as a result of the evaluation?	YES		
5	Management board/Responsibilities of the management board	The management board has the responsibilities set out in Article 45 of the Code?	YES		
5	Management board/Responsibilities of the management board	The management board has set the percentage of representation of the underrepresented gender in senior management as a target to be achieved in the next five years?	NO	Senior Management members are selected on the basis of their skills, knowledge and education, as well as professional and practical experience.	
5	Management board/Responsibilities of the management board	The set percentage of representation of the underrepresented gender in senior management is published in the annual report, 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, and the plan and deadline for achieving it, which may not exceed five years, and a statement of progress towards the plan?	NO	Senior Management members are selected on the basis of their skills, knowledge and education, as well as professional and practical experience.	
5	Management board/Responsibilities of the management board	The management board has adopted 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		
5	Management board/Responsibilities of the management board	The rules of procedure of the management board must be approved by the supervisory board?	YES		
5	Management board/Responsibilities of the management board	In the case of a group, the management board of the parent company has ensured effective oversight of the activities of the other companies in the group and the existence of appropriate cooperation within the group?	YES		
5	Management board/Responsibilities of the management board	In the case of a group, the management board of the parent company has ensured 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		
5	Management board/Responsibilities of the management board	In the case of a group, information about the supervision system and intra-group cooperation, as well as the intra-group rules of action, are freely available on the company's website?	NO	Neither the articles of association nor internal acts provide for an obligation to disclose such rules.	
5	Management board/Responsibilities of the management board	Where no company management agreement has been concluded, the management board of the dependent company prepared, within the first three months of the financial year, a report on the company's relations with related companies?	YES		
5	Management board/Responsibilities of the management board	The report of the dependent company's management board on relations with related companies contains all legal transactions that the company undertook in the previous year with the controlling company or companies related to it, or on their instructions in the interest of those companies, as well as all other actions that it took or failed to take in the previous year on the instructions of those companies?	YES		
5	Management board/Responsibilities of the management board	The report of the dependent company's management board on relations with related companies contains, for legal transactions and for 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	The auditor has audited the report of the dependent company's management board on relations with related companies and submitted its signed report to the company's management board?	YES		
5	Management board/Responsibilities of the management board	The supervisory board examined the report of the dependent company's management board on relations with related companies, took a position on the results of the audit, and reported on this to the general meeting in its report submitted to the general meeting?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
5	Management board/Composition	The supervisory board ensures that the management board maintains a profile which 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 account the need to ensure a balanced representation of both genders?	YES		
5	Management board/The president	The responsibility of the president of the management board for all the activities set out in Article 49 of the Code is prescribed?	YES		

5	Management board/Limits on other appointments	The company's internal regulations provide that management board members must obtain the prior approval of the supervisory board before accepting an appointment to the management or supervisory board of a company that is not part of the same group?	YES		
5	Management board/Limits on other appointments	Management board members hold no more than two positions on the management or supervisory boards of companies that are not part of the same group?	YES		
5	Management board/Board evaluation	In the past 12 months, the supervisory board evaluated the effectiveness of the arrangements for cooperation between the supervisory and management boards, as well as the adequacy of the support and information it receives from the management board?	YES		
5	Management board/Board evaluation	The results of the evaluation of the arrangements for cooperation between the supervisory and management boards are included in the annual report?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
5	Management board/Board evaluation	The management board evaluated its own effectiveness and that of its individual members at least once a year, applying the same criteria and avoiding any form of discrimination?	YES		
5	Management board/Board evaluation	The management board reported to the supervisory board the conclusions regarding the evaluation of its own effectiveness and that of its individual members?	YES		
6	Remuneration of management and supervisory board members/Role of the remuneration committee	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 of the workforce as a whole, and has 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?	NO	The remuneration committee recommends the remuneration policy at least every four years, all in accordance with the Companies Act.	
6	Remuneration of management and supervisory board members/Role of the remuneration committee	The remuneration committee recommended to the supervisory board the remuneration to be received by 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		
6	Remuneration of management and supervisory board members/Role of the remuneration committee	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, which policy was submitted to the general meeting for approval?	YES		
6	Remuneration of management and supervisory board members/Role of the remuneration committee	The remuneration committee monitored the amount and structure of remuneration to 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?	NO	The powers of the Remuneration Committee as a committee of the Supervisory Board relate only to the supervisory board and the management board.	
6	Remuneration of management and supervisory board members/Role of the remuneration committee	The remuneration committee oversaw the preparation of the annual remuneration report required by law, for approval by the supervisory board?	YES		
6	Remuneration of management and supervisory board members/Remuneration of management board members	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	The remuneration policy is non-discriminatory and consistent 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	The level of remuneration of management board members takes into account the agreed strategy, risk appetite, the economic environment within which the company operates, the fulfilment of sustainability objectives, and the pay and conditions of employees within the company?	YES		
6	Remuneration of management and supervisory board members/Remuneration of management board members	The remuneration policy stipulates that a management board member must not dispose of shares awarded to them as part of their remuneration for at least two years from the day on which they were awarded?	NO	Restrictions on the disposal of shares are governed by the share award agreement with the individual management board member and by a separate internal act.	
6	Remuneration of management and supervisory board members/Remuneration of management board members	The remuneration policy stipulates that a management board member must not exercise share options awarded to them as part of their remuneration for at least two years from the day on which they were awarded?	NO	No share options were granted.	
6	Remuneration of management and supervisory board members/Remuneration of management board members	The remuneration policy includes provisions specifying the circumstances in which part of a management board member's remuneration would be withheld or recovered?	NO	Restrictions on the disposal of shares are governed by the share award agreement with the individual management board member and by a separate internal act.	
6	Remuneration of management and supervisory board members/Remuneration of management board members	The level of remuneration for the president of the supervisory board and for other supervisory board members reflects their time commitment and responsibilities, including the time commitment and responsibilities on supervisory board committees?	YES		
6	Remuneration of management and supervisory board members/Remuneration of management board members	The remuneration policy and/or the company's internal regulations prohibit the inclusion of variable or other performance-related elements in the remuneration of the supervisory board?	YES		
6	Remuneration of management and supervisory board members/Reporting on remuneration	The company has adopted a remuneration policy for the supervisory board, management board and senior management?	Partially	It has adopted a remuneration policy for the supervisory board and management board, but not for senior management.	
6	Remuneration of management and supervisory board members/Reporting on remuneration	The company carried out an assessment of the effects of the remuneration policies on the equality of remuneration of different genders?	NO	In 2025 the company did not carry out an assessment of the effects of the remuneration policies on the equality of remuneration of different genders. In line with the upcoming obligations arising from Directive (EU) 2023/970 on pay transparency, the company plans to develop and implement appropriate mechanisms in the future for monitoring and assessing the equality of remuneration between women and men.	
6	Remuneration of management and supervisory board members/Reporting on remuneration	The remuneration policy was approved by the shareholders at the general meeting?	YES		
6	Remuneration of management and supervisory board members/Reporting on remuneration	The company's approved remuneration policy is freely available on the company's website?	YES		https://valamar-riviera.com/media/482363/valamar-remuneration-policy-2024-2027.pdf
6	Remuneration of management and supervisory board members/Reporting on remuneration	The assessment of the effects of the remuneration policies on the equality of remuneration of different genders is freely available on the company's website?	NO	In 2025 the company did not carry out an assessment of the effects of the remuneration policies on the equality of remuneration of different genders. In line with the upcoming obligations arising from Directive (EU) 2023/970 on pay transparency, the company plans to develop and implement appropriate mechanisms in the future for monitoring and assessing the equality of remuneration between women and men.	
6	Remuneration of management and supervisory board members/Reporting on remuneration	The annual remuneration report includes information on the remuneration of each individual supervisory and management board member, with the content set out in Article 60 of the Code and the Companies Act?	YES		
6	Remuneration of management and supervisory board members/Reporting on remuneration	The annual remuneration report contains 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 the management board's remuneration 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?	YES		
6	Remuneration of management and supervisory board members/Reporting on remuneration	The annual remuneration report contains information on the remuneration of each member of a supervisory board committee who is not a member of the supervisory board, if applicable	NO	There is no such case.	
6	Remuneration of management and supervisory board members/Reporting on remuneration	The annual remuneration report is freely available on the company's website?	YES		https://valamar-riviera.com/media/539100/valamar-riviera-dd-remuneration-report-for-2025.pdf
6	Remuneration of management and supervisory board members/Reporting on remuneration	The auditor's report on the review of the annual remuneration report is freely available on the company's website?	YES		https://valamar-riviera.com/media/539100/valamar-riviera-dd-remuneration-report-for-2025.pdf
7	Risks, internal control and audit/Roles of the supervisory and management boards	The management board has, with the prior approval of the supervisory board, adopted a risk management policy specifying the nature and extent of the risks the company needs and is willing to take in order to achieve its long-term strategic objectives?	YES		

7	Risks, internal control and audit/Roles of the supervisory and management boards	The risk management policy takes into account sustainability matters?	YES		
7	Risks, internal control and audit/Roles of the supervisory and management boards	The articles of association and/or internal regulations of the company set out the management board's responsibility to identify the major financial, operational and external risks associated with achieving the strategy and sustaining the company's activities, and to maintain an adequate risk management and internal control system to manage and mitigate those risks?	YES		
7	Risks, internal control and audit/Roles of the supervisory and management boards	The company's 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	The audit committee monitors the integrity and completeness of the financial statements, accounting policies of the company and other formal announcements relating to the company's financial performance?	YES		
7	Risks, internal control and audit/Role of the audit committee	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		
7	Risks, internal control and audit/Role of the audit committee	The audit committee monitors the implementation of tax planning, including the distribution of tax on profit from cross-border activities?	YES		
7	Risks, internal control and audit/Role of the audit committee	The audit committee monitors the effectiveness of the company's internal financial controls?	YES		
7	Risks, internal control and audit/Role of the audit committee	The audit committee ensures the adequacy, independence and effectiveness of the external audit function?	YES		
7	Risks, internal control and audit/Role of the audit committee	The audit committee ensures the independence and adequacy of the internal audit function?	YES		
7	Risks, internal control and audit/Role of the audit committee	The audit committee monitors the implementation of actions identified as a result of external and internal audit and its own monitoring?	YES		
7	Risks, internal control and audit/Role of the audit committee	The supervisory board (or a separate supervisory board committee or the audit committee) monitors the effectiveness of the company's overall internal control and risk management systems?	YES		
7	Risks, internal control and audit/Role of the audit committee	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	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 external auditor and the terms of their appointment?	YES		
7	Risks, internal control and audit/Relations with the external auditor	In the past twelve months, the audit committee approved the external auditor's work plan, which includes the scope and content of the activities to be audited?	YES		
7	Risks, internal control and audit/Relations with the external auditor	The audit committee meets 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		
7	Risks, internal control and audit/Relations with the external auditor	The audit committee monitors the independence and objectivity of the external auditor?	YES		
7	Risks, internal control and audit/Relations with the external auditor	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	The audit committee reviewed the effectiveness of the risk management and internal control systems as a whole at least once a year?	YES		
7	Risks, internal control and audit/Risk management and internal control	The audit committee made recommendations to the supervisory and management boards regarding the effectiveness of the risk management and internal control systems, as necessary?	YES		
7	Risks, internal control and audit/Risk management and internal control	The company stated in its annual report how the supervisory board conducted supervision regarding the effectiveness of the risk management and internal control systems?	YES		https://valamar-riviera.com/media/539095/annual-report-for-2025-consolidated-pdf.pdf
7	Risks, internal control and audit/Risk management and internal control	The company described in its annual report which significant internal controls were not effective and the measures and activities taken or proposed to improve them?	NO	No internal controls that were not effective were identified.	
7	Risks, internal control and audit/Risk management and internal control	The company maintains an effective risk management system that ensures\n reliable risk identification, measurement, response, reporting and\n monitoring.	YES		
7	Risks, internal control and audit/Risk management and internal control	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		
7	Risks, internal control and audit/Risk management and internal control	The company has designated clear internal responsibilities for maintaining the risk management system and a clear procedure for those responsible to liaise with the audit committee?	YES		
7	Risks, internal control and audit/Risk management and internal control	The company has established an internal audit function responsible for supervising the effectiveness of the internal control system, including the management of risks?	YES		
7	Risks, internal control and audit/Risk management and internal control	The audit committee approved the internal audit plan in the past twelve months?	YES		
7	Risks, internal control and audit/Risk management and internal control	The audit committee received the internal auditor's reports and monitored the implementation of their recommendations?	YES		
7	Risks, internal control and audit/Risk management and internal control	The audit committee is required to recommend to the supervisory board the appointment or dismissal of the head of the internal audit function?	YES		
7	Risks, internal control and audit/Risk management and internal control	Where there is no internal audit function in the company, the audit committee has\n once in the past 12 months reviewed the need for one as part of\n its review of the internal control system	NO	The Company has an internal audit function.	
7	Risks, internal control and audit/Whistle-blowing	The management board has, with the prior approval of the supervisory board, adopted procedures for reporting breaches of the law, the company's internal rules or unethical behaviour, including cases where a breach is suspected or likely to occur?	YES		
7	Risks, internal control and audit/Whistle-blowing	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		

7	Risks, internal control and audit/Whistle-blowing	The procedures comply with the regulations on the protection of whistle-blowers, gender equality, protection against any form of harassment and anti-discrimination?	YES		
7	Risks, internal control and audit/Whistle-blowing	A detailed description of the procedure for reporting breaches of the law, the company's internal rules or unethical behaviour is freely available on the company's website?	YES		https://valamar-riviera.com/media/539453/regulation-on-the-procedure-for-internal-reporting-of-irregularities-2026.pdf; https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
7	Risks, internal control and audit/Whistle-blowing	The management board has appointed a person in charge of resolving reported irregularities?	YES		
7	Risks, internal control and audit/Whistle-blowing	The articles of association and/or internal regulations of the company provide for the duty of the management board to immediately inform the supervisory board of all identified irregularities, arrange the measures to be implemented, and inform the supervisory board of the results of the implemented measures?	YES		
7	Risks, internal control and audit/Whistle-blowing	The articles of association and/or internal regulations of the company provide for the duty of the management board to inform the whistle-blower of the results of the implemented measures, unless otherwise regulated by the relevant regulation?	YES		
7	Risks, internal control and audit/Whistle-blowing	The articles of association and/or internal regulations of the company provide for the duty of the management board to ensure the protection of the whistle-blower's identity and protection against possible retaliation?	YES		
7	Risks, internal control and audit/Whistle-blowing	The audit committee reviewed the effectiveness of the whistle-blowing procedure and how it has been applied at least once a year?	YES		
8	Disclosure and transparency/Use of the company website	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		
8	Disclosure and transparency/Use of the company website	The company website is easily accessible, available to end users, clear and user-friendly?	YES		
8	Disclosure and transparency/Use of the company website	The company's annual report is available on the company's website?	YES		
8	Disclosure and transparency/Use of the company website	The half-yearly and quarterly reports and other financial information the publication of which may be required are available on the company's website?	YES		https://valamar-riviera.com/hr/investitori/financijska-izvjesca/
8	Disclosure and transparency/Use of the company website	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://esg.valamar-riviera.com/
8	Disclosure and transparency/Use of the company website	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 member of the board and the criteria for their independence, is available on the company's website?	YES		https://valamar-riviera.com/en/about-us/supervisory-board/
8	Disclosure and transparency/Use of the company website	The company's articles of association and other internal regulations in accordance with this Code are available on the company's website?	YES		https://valamar-riviera.com/en/investors/corporate-governance/
8	Disclosure and transparency/Use of the company website	The company's policies on social and environmental impact, human rights, including children's rights, inclusive working environment, bribery and corruption, and discrimination are available on the company's website?	YES		https://valamar-riviera.com/media/482265/dividend-policy-1-23-24.pdf
8	Disclosure and transparency/Use of the company website	The company's internal rules and the method of reporting irregularities are available on the company's website?	YES		
8	Disclosure and transparency/Use of the company website	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://valamar-riviera.com/media/538980/valamar-riviera-organisation-structure-2025.pdf
8	Disclosure and transparency/Use of the company website	Data on any cross-shareholdings involving the company are available on the company's website?	NO	The company has no cross-shareholdings.	https://valamar-riviera.com/media/539453/regulation-on-the-procedure-for-internal-reporting-of-irregularities-2026.pdf
8	Disclosure and transparency/Use of the company website	The report on corporate income tax information is available on the company's website?	NO	In accordance with the Accounting Act, the company is not required to prepare and disclose a report on corporate income t	https://valamar-riviera.com/media/539169/annual-report-for-2025-consolidated.pdf
8	Disclosure and transparency/Use of the company website	The report on related party transactions is available on the company's website?	YES		https://valamar-riviera.com/media/539169/annual-report-for-2025-consolidated.pdf
8	Disclosure and transparency/Use of the company website	The report on the company's relations with related companies is available on the company's website?	YES		https://valamar-riviera.com/media/539169/annual-report-for-2025-consolidated.pdf
8	Disclosure and transparency/Use of the company website	Information on the concluded shareholders' agreements, including detailed information on who the parties to the agreement are, what the basic purpose of the concluded agreement is and how it is achieved, as prescribed by law, is available on the company's website?	NO	There are no concluded shareholders' agreements in relation to the company Valamar Riviera d.d.	
8	Disclosure and transparency/Use of the company website	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://valamar-riviera.com/en/investors/financial-news/?page=1&year=2025
8	Disclosure and transparency/Use of the company website	The remuneration policy for supervisory board, management board and senior management members, and the annual remuneration report, are available on the company's website?	Partially	The remuneration policy for supervisory and management board members has been disclosed: https://valamar-riviera.com/media/482335/politika-primitaka-valamar-riviera-dd-2024-2027.pdf, as well as the annual remuneration report for supervisory and management board members: https://valamar-riviera.com/media/539101/valamar-riviera-dd-izvjesce-o-primicima-za-2025.pdf	
8	Disclosure and transparency/Use of the company website	The dividend policy is available on the company's website?	YES		https://valamar-riviera.com/media/482265/dividend-policy-1-23-24.pdf
8	Disclosure and transparency/Use of the company website	The risk management policy, including information on the nature and effectiveness of the related due diligence procedures, is available on the company's website?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
8	Disclosure and transparency/Use of the company website	A calendar of events for the next twelve months, including the dates of the general meeting, the publication of financial results, dividend payments and investor conferences, is available on the company's website?	YES		https://valamar-riviera.com/en/investors/calendar-of-events/
8	Disclosure and transparency/Use of the company website	All materials related to the general meeting, including the decisions of the meeting, are available on the company's website?	YES		https://valamar-riviera.com/en/investors/financial-news/general-assembly-convocation-invitation-to-the-shareholders-1-49-26/ ; https://valamar-riviera.com/en/investors/financial-news/general-assembly-notification-and-voting-results-1-99-26/
8	Disclosure and transparency/Use of the company website	The name and contact details of the person in charge of investor relations are available on the company's website?	YES		https://valamar-riviera.com/en/investors/
8	Disclosure and transparency/Use of the company website	The company has ensured that the information on the website is kept up to date and published within the time limits prescribed in law and regulations?	YES		
8	Disclosure and transparency/Use of the company website	All data on the website are available freely and unconditionally in Croatian?	YES		

8	Disclosure and transparency/Use of the company website	All data on the website are available freely and unconditionally in English?	YES		
8	Disclosure and transparency/Annual report	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		
8	Disclosure and transparency/Annual report	The company's annual report contains details of all shares and other financial instruments of the 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?	Partially	The annual report contains such information for supervisory and management board members, but not for senior management.	
8	Disclosure and transparency/Annual report	The company's annual report contains details of all contracts and agreements between members of the management or supervisory boards and the company (or persons related to either party)?	NO	There were no such contracts or agreements in 2025.	
8	Disclosure and transparency/Annual report	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		
8	Disclosure and transparency/Annual report	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		
8	Disclosure and transparency/Annual report	The company's annual report contains information on the concluded shareholders' agreements, including detailed information on who the parties to the agreement are, what the basic purpose of the concluded agreement is and how it is achieved, as prescribed by law?	NO	There are no concluded shareholders' agreements in relation to the company Valamar Riviera d.d.	
8	Disclosure and transparency/Annual report	The company's annual report contains a report on gender equality, the fulfilment of the conditions regarding the balanced representation of both genders on the supervisory board, management board and in senior management, with an explanation if these are not met?	YES		
8	Disclosure and transparency/Annual report	The company's annual report contains information on the fulfilment of the conditions relating to the independence of the supervisory board members and the criteria for their independence?	YES		
8	Disclosure and transparency/Annual report	The company's annual report includes a description of the sustainability-related objectives determined by the company and a report on their achievement?	YES		
8	Disclosure and transparency/Annual report	The annual report covers 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?	NO	There were no such cases in 2025.	
8	Disclosure and transparency/Annual report	The report on the application of the corporate governance code is included in the company's annual report?	YES		
8	Disclosure and transparency/Annual report	The report on the application of the corporate governance code contains everything prescribed by the Accounting Act?	YES		
8	Disclosure and transparency/Annual report	The company has 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		
9	Shareholders and the general meeting/Relations with shareholders	The company has effective mechanisms that enable minority shareholders to\n raise issues directly with the president of the management board and the supervisory board, and all information is\n available on the company's website	YES		
9	Shareholders and the general meeting/Relations with shareholders	Information about the formal mechanisms that enable minority shareholders to raise issues directly with the president of the management board and the president of the supervisory board is freely available on the company's website?	YES		https://valamar-riviera.com/en/investors/
9	Shareholders and the general meeting/Relations with shareholders	The company has designated an individual as the investor relations contact for all shareholders, whose responsibilities include ensuring a rapid response to requests for information?	YES		
9	Shareholders and the general meeting/General meeting	The company's articles of association and/or internal regulations do not in any way restrict the ability of shareholders to convene a general meeting, participate in it, or place items on the agenda?	YES		
9	Shareholders and the general meeting/General meeting	The company's articles of association and/or internal regulations allow shareholders to exercise their voting rights by proxy without restriction?	YES		
9	Shareholders and the general meeting/General meeting	The company's articles of association and/or internal regulations allow shareholders to exercise their voting rights by electronic communication without restriction?	NO	Given the large number of shareholders, administrative and legal problems are possible, such as accurately establishing identity, attendance, cessation of participation, quorum, entry into the notarial minutes, and the like.	
9	Shareholders and the general meeting/General meeting	An explanation of the different means by which shareholders can exercise their voting rights is included in the documents for the general meeting?	YES		
9	Shareholders and the general meeting/General meeting	The company's articles of association or a decision of the management board allow the general meeting to be held in a hybrid format?	NO	Given the large number of shareholders, administrative and legal problems are possible, such as accurately establishing identity, attendance, cessation of participation, quorum, entry into the notarial minutes, and the like.	
9	Shareholders and the general meeting/General meeting	The company's articles of association or a decision of the management board allow shareholders who do not participate in the general meeting to cast their votes, after the notice convening the general meeting is published and before it is held, in writing or by electronic communication (postal voting)?	NO	The company considers that the existing means of exercising shareholder rights are appropriate to its ownership structure and organisation and ensure effective participation of shareholders in the work of the general meeting in accordance with statutory provisions and the articles of association. The company will continue to monitor developments in regulatory requirements and good corporate governance practice in this area.	
9	Shareholders and the general meeting/General meeting	The notice of the general meeting was issued no later than 30 days before the day it was held?	YES		
9	Shareholders and the general meeting/General meeting	The agenda, resolutions and all other materials required for the general meeting are freely available on the company's website?	YES		https://valamar-riviera.com/en/investors/financial-news/general-assembly-convocation-invitation-to-the-shareholders-1-49-26/; https://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf/
9	Shareholders and the general meeting/General meeting	All documents are available in Croatian and English?	YES		
9	Shareholders and the general meeting/General meeting	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 by electronic communication, and how the company has ensured the legally prescribed conditions for the use of electronic communication?	Partially	Participation in the general meeting by electronic communication is not provided for.	
9	Shareholders and the general meeting/General meeting	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		
9	Shareholders and the general meeting/General meeting	The external auditor attended the general meeting at which the financial reports were presented?	YES		
9	Shareholders and the general meeting/General meeting	The company made the decisions of the general meeting freely available on its website?	YES		https://valamar-riviera.com/media/500824/general-assembly-convocation-invitation-to-the-shareholders-1-67-25.pdf; https://valamar-riviera.com/media/500909/general-assembly-notification-and-voting-results-1-83-25.pdf
9	Shareholders and the general meeting/General meeting	Within 30 days of the general meeting, the company made freely available on its website the answers to the questions asked at the general meeting?	YES		https://valamar-riviera.com/media/503856/odgovori-na-postavljena-pitanja.pdf

10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on assessing the impact of the company's activities on the environment and the community and managing the associated risks, in the entire value chain?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	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?\n	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on creating an inclusive work environment, in particular for persons with disabilities?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on achieving the work-life balance of employees?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on ensuring the equal remuneration of different genders for equal work and/or work of equal value?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	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 discrimination?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on preventing and sanctioning bribery and corruption and protecting whistle-blowers?	YES		https://valamar-riviera.com/media/539453/regulation-on-the-procedure-for-internal-reporting-of-irregularities-2026.pdf; https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on tax planning that ensures that most taxes are paid in the countries where the activities are carried out and income is generated?	NO	There is no formal policy on tax planning, but in practice taxes are planned through various projections.	
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on communication between the company and the main stakeholders?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf; https://valamar-riviera.com/media/494040/valamar-riviera-dd-privacy-policy-en.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards agreed and adopted policies on the application of due diligence procedures and measures in the company, its subsidiaries and, where relevant, its direct and indirect business partners?	YES		https://valamar-riviera.com/media/539413/code-of-business-conduct_2026.pdf
10	Stakeholders, sustainability and resilience/Responsible business conduct	In agreeing and adopting the policies set out 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?	NO	The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct will be taken into account when the Company's Code of Business Conduct is amended for future periods, to the extent that they can be applied to the Company as a Croatian resident.	
10	Stakeholders, sustainability and resilience/Responsible business conduct	All the policies referred to in Article 88 of the Code are freely available on the company's website?	YES		
10	Stakeholders, sustainability and resilience/Responsible business conduct	The supervisory and management boards ensured periodic monitoring of the implementation and effectiveness of all the policies they agreed and adopted in accordance with Article 88 of the Code?	YES		
10	Stakeholders, sustainability and resilience/Responsible business conduct	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	Stakeholders, sustainability and resilience/Stakeholder engagement	The supervisory and management boards jointly identified who they consider to be the company's key stakeholders?	YES		
10	Stakeholders, sustainability and resilience/Stakeholder engagement	The management board ensured that there are effective mechanisms in place for regular engagement with the key stakeholders, and for informing the supervisory board of the results of that engagement?	YES		
10	Stakeholders, sustainability and resilience/Stakeholder engagement	The supervisory board is entitled, with prior notice to the president of the management board, to organise meetings with external stakeholders where it considers it necessary?	YES		
10	Stakeholders, sustainability and resilience/Stakeholder engagement	The mandate of each supervisory board committee clearly specifies the purposes for which the president of the committee can communicate directly with stakeholders and the procedure to be followed in such cases?	YES		
10	Stakeholders, sustainability and resilience/In-house training	The company organises continuous training for the supervisory board, management board and all employees regarding gender equality, the inclusion of persons with disabilities and children's rights, especially when the structure of employees changes significantly or when the regulations relating to these matters change significantly?	Partially	Continuous training in this area is carried out for all existing and new employees. Training for the supervisory board and management board is carried out as needed.	
10	Stakeholders, sustainability and resilience/In-house training	The 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		