

CHAPTER	PROVISION	ARTICLE	QUESTION	ANSWER (Each question is answered by choosing the answer from the drop-down menu)	EXPLANATION (USE only for questions that were answered with "NO" or "PARTIALLY")
1	Cooperation	1	The articles of association and/or other internal acts clearly define the powers of the supervisory board and management board.	YES	
1	Cooperation	1	The articles of association and/or other internal acts establish the availability of charge on the website of the company.	PARTIALLY	The Articles of Association are available on the company's website, but not all other internal acts of the company.
1	Cooperation	2	The supervisory board has adopted a decision in which it stated categories of decisions and legal transactions that require prior approval by the supervisory board and those decisions about which management board must consult with the supervisory board before making a decision and a summary thereof is available free of charge on the website of the company.	YES	
1	Cooperation	2	The articles of association and/or internal company acts provide for prior consent of the supervisory board for making important decisions that affect the strategy of the company, expenses, risk, and financial matters.	YES	
1	Cooperation	3	The articles of association and/or internal company acts provide that the supervisory board and its committees have broad access to documents, personnel and other services when necessary for the satisfactory performance of their duties.	YES	
1	Cooperation	4	The articles of association and/or other internal company acts require that the management board must report to the supervisory board of regular reviews on the operating results of the company, financial situation, substantial financial and non-financial risks and results of interaction with stakeholders and other stakeholders.	YES	
1	Cooperation	5	Decisions and/or internal company documents stipulate that the president of the management board shall immediately notify the supervisory board if there is or is likely to be an event to occur that has the potential to significantly affect the results, financial position or reputation of the company.	YES	
1	Rules of conduct	6	The supervisory board approved the rules of conduct on other internal acts, which stipulate the rules of conduct to be followed by members of the management and supervisory board members, employees and others acting on behalf of the company, which also contain rules and measures to be taken in case of an offence.	NO	Pursuant to the Company's Articles of Association, the consent of the Supervisory Board is not required for the adoption of such an act.
1	Rules of conduct	6	Rules of conduct for other interested parties available free of charge on the website of the company.	NO	The company will consider adopting such an act.
2	Conflict of interest	7	For members of the management board and the supervisory board the prohibition of participation in decision-making in relation to which there are conflicts of interest is stipulated.	YES	
2	Conflict of interest	7	The supervisory board has given prior consent to the policy for managing conflicts of interest.	YES	
2	Conflict of interest	8	The policy for managing conflicts of interest is available free of charge on the website of the company.	YES	
2	Conflict of interest	8	Members of the supervisory board are obliged to inform the supervisory board that they are in a conflict of interest.	YES	
2	Conflict of interest	8	Management board members have a duty to inform the president of the supervisory board and other members of the supervisory board of all matters pertaining to conflict of interest.	YES	
2	Conflict of interest	8	The supervisory board keeps records of all matters pertaining to conflict of interest.	YES	
2	Conflict of interest	9	Members of the management board or the supervisory board have an obligation to declare the President and/or Vice-President of the board if it considers that another member of management or supervisory board is in a conflict of interest.	YES	
2	Competition ban	10	Members of the supervisory board and management do not perform activities that compete with the business of the company, as do members of the management or supervisory board of the companies that carry out such activities or hold more than 1% stake in such companies.	YES	
2	Competition ban	10	Members of the management board and the supervisory board can hold shares in the companies with which the company is in the competition, informed the majority of the company of all the shares in such companies and the nature of these shares are available free of charge on the website of the company.	YES	
2	Related party transactions	11	The transactions between members of the management or supervisory board and the company or a person affiliated with any party can not be concluded without the prior consent of the supervisory board.	YES	
2	Related party transactions	11	The list value of each related transaction results correctly an independent expert prior to the transaction, and/or his/her report has to be available free of charge on the website of the company.	NO	This obligation is not provided by the internal act of the Company.
2	Related party transactions	12	The company has adopted procedures for the approval and disclosure of transactions between members of the management or supervisory board and the company or a person affiliated with any party.	NO	This obligation will be included in the Company's internal procedures.
2	Related party transactions	12	The audit committee annually assesses the effectiveness of these procedures.	NO	This obligation will be included in the Company's internal procedures.
3	Remuneration	13	The supervisory board is responsible for appointing and dismissing members of the management and supervisory board and the supervisory board has the right to request the resignation of the members of the management and supervisory board to the board of directors.	YES	
3	The role of the supervisory board	14	The supervisory board has approved formal and transparent procedures for the appointment to and dismissal of the management board.	YES	
3	The role of the supervisory board	14	The supervisory board has set an objective percentage of female members in the supervisory board and the management board which must be achieved in the next five years and adopted a plan for the implementation of the goal. Percentage or target and plan were published in the annual report.	PARTIALLY	Even though the Supervisory Board of the Company has not adopted a formal plan, ensuring gender equality of its members is one of its long-standing goals, as outlined in the Company's internal procedures.
3	The role of the supervisory board	14	A report regarding progress on the plan has been published in the annual report.	PARTIALLY	The annual report contains information of the composition of the Management and Supervisory Boards, which includes information on realization of the goal to increase the number of female members.
3	The role of the supervisory board	15	The remuneration committee has all the tasks listed in Article 15 of the Code.	YES	
3	Director of supervisory board members by the general meeting	16	Other remaining candidates for the supervisory board to be general meeting for election the company provides information within the general meeting materials on the basis regulated by Article 16 of the Code.	YES	
3	Director of supervisory board members by the general meeting	16	Information provided by Article 16 of the Code are freely available on the company's website.	YES	
3	Director of supervisory board members by the general meeting	17	Members for the general meeting consist of the information listed in Article 17 of the Code.	YES	

3	Effectiveness of supervisory board members by the board	18	The information referred to in Article 17 of the Code is available free of charge on the website of the company after a claim when received or directly from the supervisory board which is not elected by the shareholders at the general meeting is reported	NO	The obligation will be included in the Assembly minutes which are published on the Company website.
4	Responsibility of the supervisory board	19	The terms of reference of the supervisory board include all the responsibilities set in Article 19 of the Code	YES	
4	Composition	20	The supervisory board has developed a supervisory board profile which specifies the maximum number of members and composition of skills, knowledge and education, as well as professional and practical experience that is required in the supervisory board	YES	
4	Composition	21	The supervisory board includes members of different gender, age, profile and experience to ensure a broad representation of different perspectives	YES	
4	Composition	22	Members of the supervisory board are independent in accordance with the definition therein of the members of the supervisory board set out in Article 21 of the Code	YES	
4	Composition	22	The President or deputy president of the supervisory board are independent	YES	
4	President	23	The president of the supervisory board is responsible for the activities listed in Article 23 of the Code	YES	
4	Board committees	24	Supervisory board established the remuneration committee	YES	
4	Board committees	24	Supervisory board established the nomination committee	YES	
4	Board committees	24	Supervisory board established the audit committee	YES	
4	Board committees	24	The supervisory board assigned the responsibilities and activities of each committee	YES	
4	Board committees	26	Each committee of the supervisory board consists of members who have the necessary skills, knowledge and education, as well as professional and practical experience to carry out the Committee responsibilities effectively	YES	
4	Board committees	27	Each committee of the supervisory board has at least three members	YES	
4	Board committees	28	Members of the committee of each committee of the supervisory board are independent (as defined in Article 4 of the Code)	YES	
2	Board committees	29	Board committees are established by the resolutions of the committees of the supervisory board	YES	
4	Board committees	29	The terms of reference of each committee is made freely available on the company website	PARTIALLY	A description of the work of the Conflict of Interest Committee and the Committee for Market Protection Measures is available on the company's website. The Company will include terms of reference of all of the SB committees on its website.
4	Board committees	29	The Company's annual report includes a report on the work of each committee of the supervisory board as well as information on the number of meetings held and the members of the committee	YES	
4	Time commitment	29	The minimum expected time commitment of each supervisory board member is specified on their appointment	YES	
4	Time commitment	29	The annual report includes record of attendance at the meetings for each member of the supervisory board and the appointment	YES	
4	Time commitment	30	The articles of association and/or internal company acts oblige the obligation of the supervisory board members to attend the meetings of the company about their membership in the supervisory board and the committees of the supervisory board	YES	
4	Frequency and format of meetings	31	The supervisory board meets at least every three months	YES	
4	Frequency and format of meetings	31	The supervisory board has adopted a workplan that includes time and agenda of future meetings	YES	
4	Frequency and format of meetings	31	Committees of the supervisory board shall meet as often as necessary for the effective discharge of their duties, and regularly report to the supervisory board on its activities	YES	
4	Frequency and format of meetings	32	The supervisory board can meet without the participation of the management board where it considers it appropriate	YES	
4	Frequency and format of meetings	32	Non-board committee members can participate in committee meeting only at the invitation of the committee	YES	
4	Support	33	The company has designated an individual to carry out the duties of a company secretary	YES	The company has not appointed a person to carry out the duties of a company secretary
4	Support	33	According to the company's internal acts, the person carrying out the duties of a company secretary is responsible for ensuring that supervisory board procedures are complied with, advising the supervisory board on governance matters, supporting the president of the supervisory board and helping the supervisory board and committees to function effectively	PARTIALLY	The described tasks are the responsibility of the company's Management Board
4	Quality and treatment of information	34	The board terms of reference and/or internal acts require the materials for supervisory board meetings to be provided to all its members in least one week before the meeting	YES	
4	Quality and treatment of information	34	The board committee terms of reference and/or internal acts require the materials for board committee meetings to be provided to all its members in least one week before the meeting	YES	
4	Quality and treatment of information	35	The articles of association and/or internal company acts articulate that the minutes of the meeting of the supervisory board must be available to all members of the supervisory board	YES	
4	Quality and treatment of information	35	Supervisory board meeting minutes provide data on voting results including details of how individual members voted	YES	
4	Quality and treatment of information	36	The supervisory board has the right to receive information and advice from people outside the company or the appointer of the company if it considers it necessary to do so, provided that the procedures for it is specified in the internal documents of the company issued by the management board with the consent of the supervisory board	PARTIALLY	The decision on informing and/or consulting from persons outside the company at the expense of the company is made at the meeting of the Supervisory Board. The obligation will be included in the Company's internal procedures
4	Training and development	37	All members of the supervisory board at the time of appointment received induction training for their role	YES	
4	Training and development	37	All supervisory board members receive ongoing training and education to improve their skills and knowledge	YES	
4	Training and development	38	The board/other main members receive regular updates and training from the management board and experts on matters relevant to the company and to their roles	YES	
4	Supervisory board evaluation	39	The supervisory board evaluated its effectiveness in the past 12 months	YES	
4	Supervisory board evaluation	39	The supervisory board appointed the evaluation method of its members in the last 12 months	YES	
4	Supervisory board evaluation	39	The evaluation of the supervisory board was carried out by the president or deputy president	PARTIALLY	The evaluation of the effectiveness of the members of the Supervisory Board is carried out by the Nominations Committee, whose member is the Deputy Chairman of the Supervisory Board
4	Supervisory board evaluation	40	The evaluation of the supervisory board included an assessment of all the matters specified in Article 40 of the Code	YES	
4	Supervisory board evaluation	41	The annual report includes the assessment report of the supervisory board and its committees in which they assessed all the circumstances set out in Article 41 of the Code	NO	The Company will include the evaluation report of the Supervisory Board and its committees in the annual report

5	Responsibilities of the management board	42	The duties of management board include all the activities listed in Article 42 of the Code.	YES	
5	Responsibilities of the management board	43	The supervisory board has approved internal rules of procedure adopted by the management board that define the matters specified in Article 43, of the Code.	YES	
5	Responsibilities of the management board	44	In the case of groups, the management board of the parent company is obliged to ensure effective oversight over the activities of other companies in the group.	YES	
5	Responsibilities of the management board	44	The articles of association and/or internal company acts contain rules governing responsibilities and reporting procedures of the management board.	NO	The obligation will be included in the Company's internal procedures.
5	Composition	45	The supervisory board ensures that management members a profile of the management board which ensures the involvement of members with a combination of expertise and covers the skills, knowledge and education, as well as professional and practical experience that are required for management board.	YES	
5	The president	46	The president of the management board is formally responsible for the activities listed in Article 46 of the Code.	YES	
5	Limits on other appointments	47	Internal company documents provide that the members of the management board may also hold the prior consent of the supervisory board before accepting appointment to the management board of other companies.	YES	
5	Limits on other appointments	47	The company provides that board members are prohibited from holding more than two positions in the management or supervisory board of other such companies.	NO	The Company is a highly highly regulated institution in which, in addition to the Company Law and the Trust Act, the Regulation on leasing approvals for the appointment of management board members and for acquiring qualified or controlling interests apply, along with criteria for assessing the stability of members of the Supervisory Board, holders of key functions, and senior management (Official Gazette 2021, 432, and 14032), as well as the ESM Guidelines on the management body of market operators and data reporting service providers.
5	Board evaluation	48	The supervisory board is in line with 17 months regular effectiveness or management board cooperation between the supervisory board and the management board, as well as the adequacy of appointment and remuneration for the management board.	YES	
5	Board evaluation	48	Results of the evaluation of arrangements for cooperation between the supervisory board and the management board are published in the annual report.	YES	
5	Board evaluation	49	The management board has evaluated its own effectiveness and that of its individual members in the annual report.	YES	
5	Board evaluation	49	The management board has reported the conclusions of the evaluation of its members in the annual report.	YES	
6	Role of remuneration committee	50	The duties of the remuneration board include all the activities listed in Article 50 of the Code.	YES	
6	Remuneration of management board members	51	The supervisory board determines the annual remuneration of each member of the management board, based on recommendations of the remuneration committee and in accordance with the general remuneration policy.	YES	
6	Remuneration of management board members	51	The level of receipt of members of the management board takes into account the agreed strategy, the specific conditions in which the company operates and its major risk conditions of members within companies.	YES	
6	Remuneration of management board members	52	Remuneration policy provides that a management board member may not discuss the issues assigned to be part of the remuneration at least two years from the date on which the issues were assigned to him or her.	YES	
6	Remuneration of management board members	53	Remuneration policy provides that management board member may not make use of stock options assigned to him or her as part of the remuneration for at least two years from the date on which such options were assigned to him or her.	YES	
6	Remuneration of management board members	53	Remuneration policy includes provisions that clearly define the circumstances in which a portion of the remuneration of management board member will not or is also subject to be returned.	YES	
6	Remuneration of supervisory board members	54	Remuneration board is the president of the supervisory board and of other members of the supervisory board reflects the time commitment and responsibilities, including the time commitment and responsibilities of the members of the supervisory board.	YES	
6	Remuneration of supervisory board members	55	Remuneration policy and/or internal company documents provide the inclusion of variable elements or other elements related to performance in the remuneration of the supervisory board.	YES	
6	Reporting on independence	56	Remuneration policy of the company was approved by shareholders at a general meeting.	YES	
6	Reporting on independence	56	The company has made freely available on its website its remuneration policy, as approved by the shareholders.	YES	
6	Reporting on independence	57	Annual report on remuneration includes data on remuneration of each individual member of the management board and each member of the remuneration committee.	YES	
7	Role of the supervisory and management boards	58	Management board, with the prior approval of the supervisory board, adopts a policy that determines the scope and areas of risk that the company needs and that it wishes to take in order to achieve all the long-term strategic objectives ("not applicable").	YES	
7	Role of the supervisory and management boards	59	The management board is formally responsible for the activities listed in Article 59 of the Code.	YES	
7	Role of the audit committee	60	Some of the activities of the audit committee include all activities listed in Article 60 of the Code.	YES	
7	Role of the audit committee	61	The audit committee, the supervisory board or one of its committees, undertakes the activities referred to in Article 61 of the Code.	YES	
7	Relations with the external auditor	62	The audit committee assesses the process of selection and appointment of external auditors in accordance with the legal requirements and makes recommendations to the supervisory board for the selection of the external auditor and conditions for their appointment.	YES	
7	Relations with the external auditor	63	The audit committee in the last 12 months approved the work plan of the external auditors, which includes the audit and other services provided by the auditors.	YES	
7	Relations with the external auditor	63	The audit committee shall meet as necessary with the external auditors to discuss the issues that have been identified during the audit and to review the quality of services provided.	YES	
7	Relations with the external auditor	64	The audit committee is responsible for monitoring the independence and objective of external auditor.	YES	
7	Relations with the external auditor	64	The audit committee approved a policy on permitted non-audit services provided by the external auditor.	PARTIALLY	The audit committee oversees non-audit services, but the obligation is not defined in the Company's internal procedures.
7	Risk management and internal control	65	The audit committee evaluated the effectiveness of risk management and internal control system as a whole at least once a year.	YES	
7	Risk management and internal control	65	The audit committee, where appropriate, makes recommendations to the supervisory board and management board regarding the effectiveness of risk management and internal control systems.	YES	
7	Risk management and internal control	66	The company monitors or evaluates risk management system that provides adequate identification of the measurement, sources, reporting and supervision.	YES	

7	Risk management and internal control	65	The company has determined clear internal responsibilities for the maintenance of the risk management system and a clear procedure for identifying critical business process responsible and the audit committee.	YES	
7	Risk management and internal control	66	The company has established an internal audit function responsible for monitoring the effectiveness of internal control systems, including risk management.	YES	
7	Risk management and internal control	67	The audit committee approved the internal audit plan in the last 12 months.	YES	
7	Risk management and internal control	68	The audit committee receives reports of internal audits and monitors the implementation of its recommendations.	YES	
7	Risk management and internal control	69	The audit committee shall recommend to the supervisory board the appointment or dismissal of the heads of the internal audit function.	YES	
7	Risk management and internal control	68	The company also has an internal audit function, the audit committee has since in the last 12 months established the need for this function as part of the assessment of internal control systems.	YES	
7	Whistle-blowing	68	Management board, with the prior approval of the supervisory board, established a procedure for reporting violations of laws or internal rules of the company, aimed at the case of suspected cases.	PARTIALLY	The Company has adopted a Policy for reporting violation of regulations for which the consent of the Supervisory Board has not been obtained.
7	Whistle-blowing	69	The procedure ensures that victims and external stakeholders do not suffer negative consequences from their reporting behavior.	YES	
7	Whistle-blowing	68	Details of the procedure for registration are available free of charge on the website of the company.	NO	The Company will implement the procedure for registration on its website.
7	Whistle-blowing	70	Details and/or internal company documents regulate the duty of the management board to inform the supervisory board of any irregularities and to act in accordance with measures that must be implemented.	YES	
7	Whistle-blowing	70	The audit committee evaluated the effectiveness of the procedure and its application in the last 12 months.	YES	
8	Use of the company website	71	All information that the company is required to disclose in accordance with the law, rules on the company Code and/or other rules of incorporation are available free of charge on the website of the company.	YES	
8	Use of the company website	72	The company releases timely, suitable and easily accessible on the website all the information required by Article 17 of the Code.	PARTIALLY	The Company will publish all of the information referred to Article 17 on its website.
8	Use of the company website	73	The company ensures that the information on the website is kept up to date and published in accordance with the applicable laws and regulations.	YES	
8	Use of the company website	74	All data on the website are freely available in both Croatian and English.	YES	
8	Annual report	74	The annual report contains all the information referred to in Article 74 of the Code.	YES	
9	Relations with shareholders	75	The Company ensures that all shareholders, regardless of the amount of shares they hold, have equal access to information about the company and about the way they can carry out and protect their rights.	YES	
9	Relations with shareholders	76	The Company has established an effective formal mechanism to ensure minority shareholders the possibility of raising questions directly to members of the management board and members of the supervisory board, and the details of the functioning of these mechanisms are available free of charge on the website of the company.	YES	
9	Relations with shareholders	77	The Company has selected a person that will act for all shareholders but the person is not in relation with investors, and control of the person is available free of charge on the website of the company.	YES	
9	General meeting	78	The articles of association and/or internal rules of the company do not in any way limit the ability of shareholders to call a general meeting, to present items to be put before the general meeting.	YES	
9	General meeting	79	The articles of association and/or internal company documents allow shareholders the opportunity to propose their own agenda items without restriction.	YES	
9	General meeting	79	The articles of association and/or internal company documents allow shareholders the opportunity to propose their own agenda items without restriction.	YES	
9	General meeting	79	Explanation of other ways in which shareholders can exercise its right to vote are set out in the documents for the general meeting.	YES	
9	General meeting	80	Minutes of the general meeting is published no later than 30 days before its date.	YES	
9	General meeting	80	The agenda, minutes and all other reports required for the general meeting are available free of charge on the website of the company.	YES	
9	General meeting	80	All documents are available in English and Croatian language.	YES	
9	General meeting	81	All persons referred to in Article 81 of the Code were present at the general meeting in the past 12 months.	PARTIALLY	The external auditor was not present.
9	General meeting	81	The external auditor was present at the general meeting where financial statements are presented.	NO	The external auditor was not present.
9	General meeting	82	The company has made the minutes of a general meeting freely available on its website without restriction.	YES	
9	General meeting	82	Other 10 days from the date of the general meeting the company has made available on its website free of charge reports to questions raised at the general meeting.	PARTIALLY	No questions were asked at the General Assembly that would require an answer within 30 days, but the Company has enabled procedures of publishing the information.
10	Corporate social responsibility	83	The company's and management board's CSR policies have been included in Article 83 of the Code.	YES	
10	Corporate social responsibility	83	These policies are available free of charge on the company's website.	YES	
10	Corporate social responsibility	84	When the management board seeks prior consent from the supervisory board for the decisions, accompanying documents explain how the recommended measure is in line with the policies associated with the proper assessment of corporate activities on the environment and the community, with the policies associated with the preservation of human rights and workers' rights and compliance with the policies associated with the preservation of human rights and workers' rights and compliance with prevention and tackling of corruption and bribery.	YES	
10	Shareholder satisfaction	85	The supervisory board and management board jointly identified which are considered key indicators of shareholder satisfaction.	YES	
10	Shareholder engagement	85	The management board has obtained the address of effective mechanisms for regular interaction with shareholders, as well as to inform the supervisory board about the results of these interactions.	YES	
10	Shareholder engagement	86	The supervisory board is authorized, subject to prior notification to the president of the management board, to organize meetings with external shareholders when it is deemed necessary.	YES	
10	Shareholder engagement	87	In the absence of any committee of the supervisory board is provided for who proposes members of the committee may communicate directly with shareholders and state procedure to follow.	NO	The acts provide for communication with board members, but not with external shareholders. The Company will implement the obligation into its internal procedures.