

## COMPLIANCE QUESTIONNAIRE FOR ISSUERS OF SHARES

All questions contained in this questionnaire relate to the period of one calendar year.

The Corporate Governance Code is intended for companies with two-tier governance structure considering that such a governance structure is most common in companies whose shares are listed on the Zagreb Stock Exchange. If the issuer has a one-tier structure, the questionnaire on management practices is answered in accordance with Appendix B of the Code of Corporate Governance

Companies respond to questions from the compliance questionnaire with **YES, NO or Partially** by selecting answers from a drop-down menu for each question.

For questions where company has responded with **YES** column **Explanation is not filled**.

For questions where company has responded with **NO or PARTIALLY** in the column **Explanation** it should explain why this is so, that is:

- explain in which part it does not comply with the provisions of the Code and for what reason,
- describe the measures taken in the place of compliance with provisions of the Code in order to fulfill the objectives set out in the relevant principles of the Code
- if the company intends to comply with the provisions of the Code in the future, indicate when it will start to act accordingly.

Instructions for generating XML Schema from XLS files are published on Hanfa's website under Technical instructions and forms in section Transparency of the issuer.

Year	Institution code
2019	199

**Instructions:**

\* Year is entered without period (eg. 2019)

\* Enter the year for which data are entered in the questionnaire

CHAPTER	PROVISION	ARTICLE	QUESTION	ANSWER (Each question is answered by choosing the answer from the drop-down menu)	EXPLANATION (fulfill 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 are available free of charge on the website of the company.	YES	
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.	PARTIALLY	The Articles of Association include categories of decisions and legal transactions that require prior approval by the Supervisory Board. The Supervisory Board has adopted a decision according to article 2 of the Code on 26 February 2020.
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 exposure and reputation.	YES	
1	Cooperation	3	The articles of association and/or internal company acts stipulate that the supervisory board and its committees have timely access to documents, premises and employees when necessary for the performance of their duties.	PARTIALLY	All required documents are promptly submitted to the Supervisory Board and its committees and also on their meetings, in accordance with article 16, paragraph 2 of the Rules of Procedure of the Supervisory Board, all invited reporters duly respond to certain issues that are discussed and decided. The internal act regulating the subject matter will be amended by the end of 2020.
1	Cooperation	4	The articles of association and/or other internal company acts stipulate that the management board must report to the supervisory board at regular intervals on the operating results of the company, financial situation, substantial financial and non-financial risks and results of interaction with shareholders and other stakeholders.	PARTIALLY	The Management Board regularly, and at last once a quarter, reports to the Supervisory Board on the Company's operations and business results. On 26 February 2020 the Supervisory Board adopted a decision that prescribes the reporting obligations to the Supervisory Board.
1	Cooperation	5	Statutes 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 for an event to arise that has the potential to significantly affect the results, financial position or reputation of the company.	PARTIALLY	The obligation of the Management Board of the Company arises from the Companies Act and article 57 of the Insurance Act.
1	Rules of conduct	6	The supervisory board approved the code of conduct (or other internal act), which establishes 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 contains rules and measures to be taken in case of its violations.	PARTIALLY	The Code of Ethics, adopted in June 2015, contains fundamental corporate values and rules of conduct and applies to all employees, including members of the Management Board; planned revision of the text in accordance with the Corporate Governance Code valid from 1 January 2020 by 31 December 2020.
1	Rules of conduct	6	Code of Conduct (or other internal act) is available free of charge on the website of the company.	NO	In the following period the Company will publish the Code of Ethics and make it available free of charge on its website.
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.	PARTIALLY	For the Management Board it is prescribed in the Policies, adopted by the Supervisory Board, on the election and assessment of the existence of conditions for performing the function of the Management Board member as of 22 November 2019. Note: Ordinance of Croatian Financial Services Supervisory Agency (HANFA) on requirements for performing the function of the insurance or reinsurance undertaking's management and supervisory board member, procurator of the insurance or reinsurance undertaking and authorised agent of the branch of the insurance or reinsurance undertaking (Official Gazette 72/19) did not prescribe obligation that an internal act on fit&proper must be passed in relation to the members of the Supervisory Board.
2	Conflict of interest	7	The supervisory board has given prior consent to the policy for managing conflicts of interest.	NO	In progress is an amendment to the policy for managing conflict of interest for which the Supervisory Board must give consent according to the Corporate Governance Code; for the currently valid policy for managing conflict of interest there was no obligation of the Supervisory Board to give consent.
2	Conflict of interest	7	The policy for managing conflicts of interest is available free of charge on the website of the company.	NO	In the following period the Company will publish the policy for managing conflict of interest and make the document available free of charge on its website.
2	Conflict of interest	8	Members of the supervisory board are obliged to inform the entire supervisory board that they are in an actual or potential 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 management board of an actual or potential conflict of interest.	YES	
2	Conflict of interest	8	The supervisory board keeps records of all notices pertaining to conflict of interest.	YES	
2	Conflict of interest	9	Member of the management board or the supervisory board has an obligation to inform the President and/or Vice-President of that board if it considers that another member of management or supervisory board is in an actual or potential 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, are not members of the management or supervisory boards of the companies that carry out such activities nor hold more than 5% stake in such companies.	YES	
2	Competition ban	10	Members of the management board and the supervisory board who hold shares in the companies with which the company is in the competition, informed the secretary of the company of all the shares in such companies and the details of these shares are available free of charge on the website of the company.	NO	Members of the Management Board and the Supervisory Board do not have shares in the companies with which the Company is in competition.
2	Related party transactions	11	No 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.	PARTIALLY	The Company acts in accordance with the Companies Act, while the internal act that will regulate the subject is being drafted and will be adopted by the end of 2020.
2	Related party transactions	11	The fair value of each material transaction must be confirmed by an independent expert prior to any such transaction, and his or her report has to be available free of charge on the website of the company.	PARTIALLY	The Company discloses transactions with related parties in accordance with IAS 24 on an annual basis. These disclosures are an integral part of the annual financial statements. Material transactions and relationships with related legal entities are the subject of transfer pricing study.
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	The internal act that will regulate the subject is being drafted and will be adopted by the end of 2020.
2	Related party transactions	12	The audit committee annually assesses the effectiveness of these procedures.	NO	The Audit committee will evaluate the effectiveness of these procedures after their adoption by the end of 2020.
3	The role of the supervisory board	13	The supervisory board is responsible for appointing and dismissing members of the management board and making recommendations for candidates for members of the supervisory board to the general meeting.	YES	
3	The role of the supervisory board	13	The supervisory board has approved formal and transparent procedure for the appointment to both management and supervisory boards.	PARTIALLY	In November 2019, the Supervisory Board of the Company has adopted a Policy on the election and assessment of the existence of conditions for performing the function of a member of the Management Board, while the Company complied with the relevant HANFA Ordinance regarding the election/appointment of the Supervisory Board members. As a public consultation is underway regarding the new HANFA Ordinance governing the mentioned matter, the Company will comply with the Ordinance, as soon as possible, upon its adoption.
3	The role of the supervisory board	14	The supervisory board has set as a target percentage of female members of the supervisory board and the management board, which must be achieved in the next five years and adopted a plan for the implementation of this goal. Percentage on target and plan were published in the annual report.	NO	When the target is established for the members of the Supervisory and Management Board, the Company will publish it.
3	The role of the supervisory board	14	A report explaining progress on the plan has been published in the annual report.	NO	There is no legal obligation. The Company will consider disclosure in its annual report.
3	The role of the nomination committee	15	The nomination committee has all the tasks listed in Article 15 of the Code.	YES	
3	Election of supervisory board members by the general meeting	16	When nominating candidates for the supervisory board to the general meeting for election the company provides information within the general meeting materials on the items requested by Article 16. of the Code.	PARTIALLY	The CVs of the candidates and the requested informations in accordance with article 281 of the Companies Act were published.
3	Election of supervisory board members by the general meeting	16	Informations provided by Article 16 of the Code are freely available on the company's website.	PARTIALLY	The CVs of the candidates were published on the Company's website as well as the requested information in accordance with article 281 of the Companies Act.
3	Election of supervisory board members by the general meeting	17	Materials for the general meeting contain all the information listed in Article 17 of the Code.	PARTIALLY	Information on attendance at meetings is contained in the minutes of meetings of the Supervisory Board and its committees and will be included in the materials for the General Assembly, while the evaluation of work of members of the Supervisory Board is based on decision on discharge.
3	Election of supervisory board members by the general meeting	18	The information referred to in Article 17 of the Code is available free of charge on the website of the company also in cases where workers' representative or another member of the supervisory board which is not elected by the shareholders at the general meeting is appointed.	NO	In 2019, the Company did not have an appointment of an employee representative, nor did a shareholder who has the right to directly appoint a member of the Supervisory Board in accordance with the Articles of Association make such an appointment.
4	Responsibilities 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	

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4	Composition	20	The supervisory board has developed a supervisory board profile which specifies the minimum number of members and combination of skills, knowledge and education, as well as professional and practical experience that required in the supervisory board.	NO	It is planned until 31 December 2020: Pursuant to the HANFA's Ordinance of 25 July 2019 there is no obligation to adopt the Policy and due to this, appointment of members of Supervisory Board is made in accordance with the Companies Act, Insurance Act, HANFA's Ordinance, the Articles of Association while the General Assembly votes on the final decision on appointment.
4	Composition	21	The supervisory board includes members of different gender, age, profile and experience to ensure a diversity perspective when making decisions.	YES	
4	Composition	22	Majority of the members of the supervisory board are independent in accordance with the definition set out in Appendix A of the Code.	NO	The members of the Supervisory Board are experts of various profiles connected or directly appointed by the two largest shareholders.
4	Composition	22	The President or deputy president of the supervisory board are independent.	NO	The Chairman and the Deputy Chairman of the Supervisory Board are experts of various profiles connected or directly appointed by the two largest shareholders.
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 nomination committee.	YES	
4	Board committees	24	Supervisory board established the remuneration committee.	YES	
4	Board committees	24	Supervisory board established the audit committee.	YES	
4	Board committees	24	The supervisory board stipulated the mandate 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	27	Majority of the members of each committee of the supervisory board are independent (as defined in Appendix A of the Code).	NO	The members of the Supervisory Board are experts of various profiles connected or directly appointed by the two largest shareholders.
4	Board committees	27	Board members are prohibited to be members of the committee of the supervisory board.	YES	
4	Board committees	28	The terms of reference of each committee is made freely available on the company's website	YES	
4	Board committees	28	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.	PARTIALLY	The annual report includes information on members of the Audit Committee. Information on number of meetings held is published in the Report of the Supervisory Board for 2019.
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 its committees.	NO	Minutes from the meetings of the Supervisory Board and its committees contain information on the presence of members at the meetings and they will be included in the next annual report.
4	Time commitment	30	The articles of association and/or internal company acts stipulate the obligation of the supervisory board member to inform the secretary of the company about their membership in the supervisory board or the management board of other companies.	PARTIALLY	The Company collected relevant data in accordance with article 281 of the Companies Act. The Internal Act of the Company will be amended in terms of article 30 of the Code by the end of 2020.
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.	PARTIALLY	The Supervisory Board has prescribed that the meetings of the Supervisory Board will be held as a rule once in 3 months, and more often if necessary.
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	
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 efficiently.	YES	
4	Quality and timeliness 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 at least one week before the meeting.	NO	The deadline for submission of materials (no later than one week before the meeting) is determined by the Rules of Procedure of the Supervisory Board of 26 February 2020.
4	Quality and timeliness 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 at least one week before the meeting.	NO	According to the Rules of Procedure of the Supervisory Board of 26 February 2020, the deadline was extended from 5 days to one week before the meeting and the same applies to the work of the Supervisory Board committees.
4	Quality and timeliness of information	35	The articles of association and/or internal company acts anticipate that the minutes of the meeting of the supervisory board must be available to all members of the supervisory board.	YES	
4	Quality and timeliness of information	35	Supervisory Board meeting minutes provide data on voting results including details of how individual members voted.	YES	
4	Quality and timeliness of information	36	The supervisory board has the right to receive information and advice from people outside the company at the expense of the company if it considers it necessary to successfully carry out its duties, provided that the procedure for it is specified in the internal documents of the company issued by the management board with the consent of the supervisory board.	PARTIALLY	If necessary, the Supervisory Board may use the services of persons outside the Company at the expense of the Company. The procedure is not specified by the internal act of the Company but it will be adopted by the end of 2020.
4	Training and development	37	All members of the supervisory board at the time of appointment received introduction 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 supervisory board members receive regular updates and briefings from the management board and experts on matters relevant to the company and to their duties.	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 assessed the individual results of its members in the last 12 months.	NO	The evaluation of the work of the members of the Supervisory Board arises from the decision on discharge.
4	Supervisory board evaluation	39	The evaluation of the supervisory board was led by the president or deputy president.	NO	There is no legal obligation.
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	NO	There is no legal obligation.
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	There is no legal obligation. The Company will consider disclosure in its 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 at the level of the parent company and subsidiaries.	PARTIALLY	Through the organization of regular workshops, distribution of the Group's accounting policies and reporting instructions, the Company regulates responsibilities and reporting procedures.
5	Composition	45	The supervisory board ensures that management maintains a profile of the management board which determines the minimum number of members and a combination of members who possess 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	

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5	Limits on other appointments	47	Internal company documents provide that the members of the management board must obtain the prior consent of the supervisory board before accepting appointment to the management board or supervisory board which is not part of the same group.	PARTIALLY	Restrictions on appointments to the Management Board or Supervisory Board are prescribed by the Insurance Act and HANFA's Ordinance on requirements for performing the function of the insurance or reinsurance undertaking's management and supervisory board member, procurator of the insurance or reinsurance undertaking and authorised agent of the branch of the insurance or reinsurance undertaking.
5	Limits on other appointments	47	Internal documents of the company provide that board members are prohibited from holding more than two positions in the management or supervisory board of other such companies.	PARTIALLY	Restrictions on appointments to the Management Board or Supervisory Board are prescribed by the Insurance Act and HANFA's Ordinance on requirements for performing the function of the insurance or reinsurance undertaking's management and supervisory board member, procurator of the insurance or reinsurance undertaking and authorised agent of the branch of the insurance or reinsurance undertaking.
5	Board evaluation	48	The supervisory board in the last 12 months, evaluated the effectiveness of arrangements for cooperation between the supervisory board and the management board, as well as the adequacy of support and information received from the management board.	YES	
5	Board evaluation	48	Results of the evaluation of arrangements for cooperation between the supervisory board and management are included in the annual report.	PARTIALLY	The results of the evaluation of the cooperation between the Supervisory Board and the Management Board are included in Report of Supervisory Board, which is publicly available.
5	Board evaluation	49	The management board has evaluated its own effectiveness and that of its individual members in the last 12 months.	NO	It is planned until 31 December 2020: Pursuant to the HANFA's Ordinance of 25 July 2019 there is no obligation to adopt the Policy and due to this, appointment of members of Supervisory Board is made in accordance with the Companies Act, Insurance Act, HANFA's Ordinance, the Articles of Association while the General Assembly votes on the final decision on appointment.
5	Board evaluation	49	The management board has reported the conclusions of the evaluations of its members to the supervisory board.	NO	The Company will form a Questionnaire on the effectiveness of the Management Board, through which they will evaluate each other by 31 December 2020 or in case of non-implementation, to clarify that the General Assembly, by giving a discharge, performs evaluation of work of the Management Board and the Supervisory Board.
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 approved remuneration policy.	YES	
6	Remuneration of management board members	52	The level of receipts of members of the management board takes into account the agreed strategy, risk appetite, the economic environment in which the company operates as well as wages and conditions of workers within companies.	YES	
6	Remuneration of management board members	53	Remuneration policy provides that a management board member may not dispose of the shares assigned to it as part of the remuneration at least two years from the date on which the shares were assigned to him or her.	NO	Remuneration policy for the Management Board members of 22 May 2019 is in accordance with Companies Act, in which this was no requirement; such type of remuneration was not applied in 2019.
6	Remuneration of management board members	53	Remuneration policy provides that a 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 stock options were assigned to him or her.	NO	Remuneration policy for the Management Board members of 22 May 2019 is in accordance with Companies Act, in which this was no requirement; such type of remuneration was not applied in 2019.
6	Remuneration of management board members	53	Remuneration policy includes provisions that closely define the circumstances in which a portion of the remuneration of management board member was put on hold or to was asked to be returned.	YES	
6	Remuneration of supervisory board members	54	Remuneration level for 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 in the committees of the supervisory board.	PARTIALLY	Some members of Supervisory Board do not receive compensation, in accordance with their waiver on the matter.
6	Remuneration of supervisory board members	55	Remuneration policy and/or internal company documents prohibit the inclusion of variable elements or other elements related to performance in the remuneration of the supervisory board.	YES	
6	Reporting on remuneration	56	Remuneration policy of the company was approved by shareholders at a general meeting.	NO	Remuneration policy of the Company was approved at the General Assembly held on 3 July 2020.
6	Reporting on remuneration	56	The company has made freely available on its website its remuneration policy, as approved by the shareholders.	YES	
6	Reporting on remuneration	57	Annual report on remuneration includes data on remuneration of each individual member of the supervisory board as well as other information contained in Article 57 of the Code.	NO	In the Annual financial statements the total remuneration is disclosed.
7	Roles of the supervisory and management boards	58	Management board, with the prior approval of the supervisory board, adopted a policy that determines the nature and extent of risk that company needs and that is willing to take in order to achieve all the long-term strategic objectives ("risk appetite").	YES	
7	Roles 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	Terms of reference of the audit committee includes 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, undertook the activities referred to in Article 61 of the Code.	YES	
7	Relations with the external auditor	62	The audit committee oversees 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 scope and content of the activities to be audited.	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 oversee 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 considers any possible engagement of the external auditor in non-audit services and makes separate decision about this. Internal act related to this question will be adopted by the end of 2020.
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 maintains an effective risk management system that provides reliable identification of risk measurement, answers, reporting and supervision.	YES	
7	Risk management and internal control	66	The company has determined clear internal responsibilities for the maintenance of the risk management system and a clear procedure for maintaining contact between persons responsible and the audit committee.	YES	
7	Risk management and internal control	67	The company has established an internal audit function responsible for monitoring the effectiveness of internal control systems, including risk management.	PARTIALLY	Although the internal audit function deals with risks and their assessment, the Company also has a separate risk management function. This function has also been periodically audited by the internal audit function.
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	67	The audit committee receives reports of internal auditors and monitors the implementation of its recommendations.	YES	
7	Risk management and internal control	68	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	If the company does not have internal audit function, the audit committee has once in the last 12 months evaluated the need for this function as part of its assessment of internal control systems.	NO	The Company has internal audit function.
7	Whistle-blowing	68	Management board, with the prior approval of the supervisory board, adopted a procedure for reporting violations of laws or internal rules of the company, actual or in the case of suspected violation.	PARTIALLY	Ordinance on the appointment of a confidential person and the procedure for internal reporting of irregularities was adopted by the Management Board on 3 December 2019. A plan is to submit it to the Supervisory Board for approval until 31.12.2020.
7	Whistle-blowing	69	The procedure ensures that workers and external stakeholders do not suffer negative consequences if they report suspicious behavior.	YES	
7	Whistle-blowing	69	Details of the procedure for registration are available free of charge on the website of the company.	YES	
7	Whistle-blowing	70	Statute and/or internal company documents stipulate the duty of the management board to inform the supervisory board of any irregularities and to agree on measures that must be implemented.	NO	The Company will until 31 December 2020 amend the Ordinance on the appointment of a confidential person and the procedure for internal reporting of irregularities and submit it to the Supervisory Board for approval.

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7	Whistle-blowing	70	The audit committee evaluated the effectiveness of the procedure and its application in the last 12 months.	NO	The Company will until 31 December 2020 amend the Ordinance on the appointment of a confidential person and the procedure for internal reporting of irregularities and submit it to the Supervisory Board for approval.
8	Use of the company website	71	All information that the company is required to disclose in accordance with the law, rules on the listing, the Code and its own Articles of Association are available free of charge on the website of the company.	YES	
8	Use of the company website	72	The company makes freely available and easily accessible on the website all the information requested by Article 72 of the Code.	YES	
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 time limits prescribed in law and regulations.	YES	
8	Use of the company website	73	All data on the website are freely available in both Croatian and English.	YES	In 2019, the Company's website was available in English and due to launching of new website this spring, the English version of the site is currently being finalized.
8	Annual report	74	The annual report contains all the information referred to in Article 74 of the Code.	PARTIALLY	There is no legal obligation. The Company will consider disclosure in its annual report.
9	Relations with shareholders	75	The Company ensured that all shareholders, regardless of the number or type of shares they hold, have equal access to information about the company and about the way they can carry and protect their rights.	YES	
9	Relations with shareholders	76	The Company has established an effective formal mechanisms to ensure minority shareholders the possibility of asking questions directly to president of the management board and president 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 for all shareholders be the person to contact in relations with investors, and contact of this 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 participate in it or to add items to the agenda.	YES	
9	General meeting	79	The articles of association and/or internal company documents allow shareholders the opportunity to exercise their right to vote by proxy without restriction.	YES	
9	General meeting	79	The articles of association and/or internal company documents allow shareholders the opportunity to exercise their right to vote electronically without restrictions.	NO	On the Company's General Assembly meetings, shareholders with a share of approximately 96% of the share capital regularly participate and there was no such requests from shareholders, otherwise the Company would perform activities to enable it.
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	Notice of the general meeting is published no later than 30 days before it is held.	YES	
9	General meeting	80	The agenda, decisions and all other materials 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.	YES	
9	General meeting	81	The external auditor was present at the general meeting where financial statements are presented.	YES	
9	General meeting	82	The company has made the decisions of a general meeting freely available on its website without delay.	YES	
9	General meeting	82	Within 30 days from the date of the general meeting the company has made available on its website free of charge answers to questions raised at the general meeting.	YES	
10	Corporate social responsibility	83	The supervisory and management boards have agreed and adopted policies listed in Article 83 of the Code.	PARTIALLY	As part of its non-financial report, the majority owner of the Company has described the stated topics, that are applied by the Company as a part of Group of the parent company.
10	Corporate social responsibility	83	These policies are available free of charge on the company's website.	NO	Please refer to the explanation to the previous question.
10	Corporate social responsibility	84	When the management board asks 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 impact assessment of company's activities on the environment and the community, with the policies associated with the preservation of human rights and workers' rights and the measures associated with prevention and sanctioning of corruption and bribery.	NO	Considering the character of decisions that are submitted for approval to the Supervisory Board and having in mind the subject of Company's operations, they do not contain the stated elements. The Company acts as a socially responsible company, which is reflected in a number of activities and initiatives that the Company has initiated or has joined them.
10	Stakeholder engagement	85	The supervisory board and management board jointly identified which are considered key stakeholders in relation to company.	YES	
10	Stakeholder engagement	85	Management board has ensured the existence of effective mechanisms for regular interaction with key stakeholders, as well as to inform the supervisory board about the results of these communications.	YES	
10	Stakeholder engagement	86	The supervisory board is authorized, subject to prior notification to the president of the management board, to organize meetings with external stakeholders when it deems it necessary.	YES	
10	Stakeholder engagement	87	In the mandate of every committee of the supervisory board it is provided for what purpose president of the committee may communicate directly with stakeholders and what procedure to follow.	PARTIALLY	The chairmen of committees of the Supervisory Board are authorized to communicate with stakeholders, although particular procedures are not prescribed.