



Corporate Governance Report - 2016

Graphisoft Park SE Ingatlanfejlesztő Európai Részvénytársaság

(1031 Budapest, Záhony utca 7., Cg.:01-20-000002)

in accordance with the Corporate Governance Recommendations of the
Budapest Stock Exchange

General Information on the report of Corporate Governance

Graphisoft Park SE (1031 Budapest, Záhony utca 7. Cg. 01-20-000002; hereinafter “company”) places great emphasis on implementing the Corporate Governance Recommendations and Guidelines, taking into account the relative small size of the group of companies formed by the company and its subsidiaries and its simple organisation structure (average of 19 employees, one-tier board, 5 members of the board of directors). The management of the company continuously improves its operational and monitoring practises.

The board of directors is continuously monitoring the operations of the company. The board of directors is holding its meetings more often than required, applying alternative methods (telephone, or other electronic communication methods), and requiring and receiving continuous information from the executive management (from the chief executive officer and the chief financial officer).

The board of directors and the executive management are performing their duties with continuous legal support, supplementing the necessary time frame and expenditure to ensure that all decisions are prepared responsibly, well founded financially and legally, taking into primary consideration the interests of the shareholders.

The company considers its primary duty to ensure that all shareholders may exercise their shareholders’ rights and upholds the equal treatment of the shareholders principle.

The general meeting representing the supreme control of the operation of the company is prepared by the management in compliance with deadlines, through an established schedule laid down in writing, ensuring that all necessary information is available in time for decision making. Similarly to the previous years’ practice the board of directors adopts propositions for all submissions on the agenda of the general meeting, further supporting the decision making of the shareholders.



Level of compliance with the Recommendations

The company should indicate whether it applies the relevant recommendation or not, and in the case of a negative answer, it should provide the reasons for not applying the given recommendation.

R 1.1.1 The Managing Body ensured that shareholders received access to information in time to enable them to exercise their rights.

Yes (Complies)

R 1.1.2 The company applies the "one share - one vote" principle.

Yes (Complies)

R 1.2.8 The company ensures that shareholders must meet the same requirements in order to attend at the general meeting.

Yes (Complies)

R 1.2.9 Items on the general meeting agenda only include subjects which are correctly detailed and summarized clearly and unambiguously.

Yes (Complies)

The proposals included the suggestions of the Supervisory Board and a detailed explanation of the effects of the decision.

Yes (instead of a Supervisory Board there is an Audit Committee at the Company)

R 1.2.10 Shareholders' comments on and supplements to the items on the agenda were published at least two days prior to the general meeting.

N/A (there were no comments or supplements)

R 1.3.8 Comments on the items of the agenda were made available to shareholders simultaneously with registration at the latest.

N/A (there were none)

Written comments made on the items on the agenda were published two working days prior to the general meeting.

N/A (there were none)

R 1.3.10 The election and dismissal of executives took place individually and by separate resolutions.

Yes (Complies)

R 2.1.1 The responsibilities of the Managing Body include those laid out in 2.1.1.

Yes (Complies)

R 2.3.1 The Managing Body held meetings regularly, at times designated in advance.

Yes (And further the Board of Directors held several meetings as determined by the course of business activities, and promptly exercised its rights and fulfilled its obligations directly via electronic communication)



The Supervisory Board held meetings regularly, at times designated in advance.

N/A (instead of a Supervisory Board there is an Audit Committee at the Company)

The rules of procedure of the Managing Body provide for unscheduled meetings and decision-making through electronic communications channels.

Yes (Complies)

The rules of procedure of the Supervisory Board provide for unscheduled meetings and decision-making through electronic communications channels.

N/A (instead of a Supervisory Board there is an Audit Committee at the Company)

R 2.5.1 The Board of Directors / Supervisory Board of the company has a sufficient number of independent members to ensure the impartiality of the board.

Yes (Complies)

R 2.5.4 At regular intervals (in connection with the CG Report) the Board of Directors / Supervisory Board requested a confirmation of their independent status from those members considered independent.

Yes (Complies)

R 2.5.6 The company disclosed on its website the guidelines on the independence of the Board of Directors / Supervisory Board, as well as the criteria applied for assessing independence.

No (But the Company acts in accordance with the provisions of Act V of 2013)

R 2.6.1 Members of the Managing Body informed the Managing Body (Supervisory Board/Audit Committee) if they (or any other person in a close relationship to them) had a significant personal stake in a transaction of the company (or the company's subsidiary).

Yes (Complies)

R 2.6.2 Transactions between board and executive management members (and persons in close relationship to them) and the company (or its subsidiary) were conducted according to general rules of practice of the company, but with stricter transparency rules in place.

Yes (Complies)

Transactions which according to 2.6.2 fell outside the normal course of the company's business, and their terms and conditions were approved by the Supervisory Board (Audit Committee).

N/A (there were none)

R 2.6.3 Board members informed the Supervisory Board/Audit Committee if they received an offer of Board membership or an offer of an executive management position in a company which is not part of the company group.

Yes (Complies)



R 2.6.4 The Managing Body established its guidelines on information flow within the company and the handling of insider information, and monitored compliance with those guidelines.

Yes (Complies)

The Managing Body established its guidelines regarding insiders' trading in securities and monitored compliance with those guidelines.

Yes (Complies)

R 2.7.1 The Managing Body formulated remuneration guidelines regarding the evaluation and remuneration of the work of the Managing Body, the Supervisory Board and the executive management.

No (Remuneration is based on the common business practice of similar sized companies, the remuneration of the Board of Directors is approved by the General Meeting, the remuneration of the executive management is partially approved by the Board of Directors and partially by the General Meeting)

The Supervisory Board formed an opinion on the remuneration guidelines.

N/A (instead of a Supervisory Board there is an Audit Committee at the Company)

The guidelines regarding the remuneration for the Managing Body and the Supervisory Board and the changes in those guidelines were approved by the general meeting, as a separate item on the agenda.

No (Remuneration is based on the common business practice of similar sized companies, the remuneration of the Board of Directors is approved by the General Meeting, the remuneration of the executive management is partially approved by the Board of Directors and partially by the General Meeting)

R 2.7.2 The Managing Body prepared an evaluation of the work it carried out in the given business year.

Yes (Complies)

R 2.7.2.1 The Supervisory Board prepared an evaluation of the work it carried out in the given business year.

Yes (Complies)

R 2.7.3 It is the responsibility of the Managing Body to monitor the performance of and determine the remuneration for the executive management.

Yes (Complies)

The frameworks of benefits due to members of the executive management that do not represent normal practice, and the changes in those benefits were approved by the general meeting as a separate agenda item.

No (there were none)

R 2.7.4 The structure of share-incentive schemes were approved by the general meeting.

Yes (Complies)

Prior to the decision by the general meeting on share-incentive schemes, shareholders received detailed information (at least according to those contained in 2.7.4 **Hiba! A hivatkozási forrás nem található.**).

Yes (Complies)

R 2.7.7 The Remuneration Statement was prepared by the company and submitted to the general meeting.

Yes (Complies)

The Remuneration Statement includes information about the remuneration of individual members of the Managing Body, the Supervisory Board, and the executive management.

Yes (Complies)



R 2.8.1 The Managing Body or the committee operated by it is responsible for monitoring and controlling the company's entire risk management.

Yes (Complies)

The Managing Body requests information on the efficiency of risk management procedures at regular intervals.

Yes (Complies)

The Managing Body took the necessary steps to identify the major risk areas.

Yes (Complies)

R 2.8.3 The Managing Body formulated the principles regarding the system of internal controls.

No (the size of the Company did not necessitate the implementation of such system)

The system of internal controls established by the executive management guarantees the management of risks affecting the activities of the company, and the achievement of the company's performance and profit targets.

No (the size of the Company did not necessitate the implementation of such system)

R 2.8.4 When developing the system of internal controls, the Managing Body took into consideration the viewpoints included in 2.8.4

No (there is no such system)

R 2.8.5 It is the duty and responsibility of the executive management to develop and maintain the system of internal controls.

No (there is no such system)

R 2.8.6 The company created an independent Internal Audit function which reports to the Audit Committee / Supervisory Board.

No (the size of the Company did not necessitate the implementation of such system, the function was carried out by the Board of Directors)

The Internal Audit reported at least once to the Audit Committee / Supervisory Board on the operation of risk management, internal control mechanisms and corporate governance functions.

No (the size of the Company did not necessitate the implementation of such system, the function was carried out by the Board of Directors)

R 2.8.7 The internal audit activity is carried out by the Internal Audit function based on authorisation from the Audit Committee / Supervisory Board.

No (there is no such body at Company)

As an organisation, the Internal Audit function is independent from the executive management.

No (there is no such body at Company, the function was carried out by the Board of Directors)

R 2.8.8 The Internal Audit schedule was approved by the Managing Body (Supervisory Board) based on the recommendation of the Audit Committee.

No (the function was carried out by the Board of Directors)



- R 2.8.9 The Managing Body prepared its report for shareholders on the operation of internal controls.
No (the size of the Company did not necessitate the implementation of independent internal controls)
- The Managing Body developed its procedures regarding the receipt, processing of reports on the operation of internal controls, and the preparation of its own report.
No (there is no such procedure)
- R 2.8.11 The Managing Body identified the most important deficiencies or flaw in the system of internal controls, and reviewed and re-evaluated the relevant activities.
N/A (there are no separated internal controls, the function was carried out by the Board of Directors, and there were no deficiencies or flaw)
- R 2.9.2 The Managing Body, the Supervisory Board and the Audit Committee were notified in all cases when an assignment given to the auditor may have resulted in significant additional expense, caused a conflict of interest, or affected normal business practices significantly in any other way.
N/A (there were none)
- R 2.9.3 The Managing Body informed the Supervisory Board of any assignment given to the external auditor or an external advisor in connection with any event, which held significant bearing on the operations of the company.
N/A (there is no Supervisory Board and there was no such event)
- The Managing Body pre-determined in a resolution what circumstances constitute "significant bearing".
No (the Board of Directors carefully evaluates case by case, preserving the interest of the shareholders, taking the totality of circumstances into consideration)
- R 3.1.6 On its website, the company disclosed duties delegated to the Audit Committee, as well as the committees targets, rules of procedure, composition (indicating the name, brief biography and the date of appointment of members).
Yes (Partially – the Audit Committee fulfills its obligations according to the Civil Code and the Articles of Association continuously, in close cooperation with the Board of Directors, the name, brief biography and the date of appointment of members is made available)
- R 3.1.6.1 On its website, the company disclosed duties delegated to the Nomination Committee, as well as the committees targets, rules of procedure, composition (indicating the name, brief biography and the date of appointment of members).
No (there is no such committee)
- R 3.1.6.2 On its website, the company disclosed duties delegated to the Remuneration Committee, as well as the committees targets, rules of procedure, composition (indicating the name, brief biography and the date of appointment of members).
No (there is no such committee)
- R 3.2.1 The Audit Committee / Supervisory Board monitored the efficiency of risk management, the operation of internal controls, and the activity of the Internal Audit.
Yes (The Board of Directors monitored the efficiency of risk management, there is no internal controls and Internal Audit at the Company)
- R 3.2.3 The Audit Committee / Supervisory Board received accurate and detailed information on the work schedule of the Internal Auditor and the independent auditor, and received the auditor's report on problems discovered during the audit.
Yes (Complies)



R 3.2.4 The Audit Committee / Supervisory Board requested the new candidate for the position of auditor to submit the disclosure statement according to 3.2.4.

N/A (the previous auditor was re-elected)

R 3.3.1 There is a Nomination Committee operating at the company.

No (the function was carried out by the Board of Directors)

R 3.3.2 The Nomination Committee provided for the preparation of personnel changes.

No (there is no Nomination Committee at Company, the function was carried out by the Board of Directors)

The Nomination Committee reviewed the procedures regarding the election and appointment of members of the executive management.

No (there is no Nomination Committee at Company, the function was carried out by the Board of Directors)

The Nomination Committee evaluated the activity of board and executive management members.

No (there is no Nomination Committee at Company, the function was carried out by the Board of Directors)

The Nomination Committee examined all the proposals regarding the nomination of board members which were submitted by shareholders or the Managing Body.

No (there is no Nomination Committee at Company, the function was carried out by the Board of Directors)

R 3.4.1 There is a Remuneration Committee operating at the company.

No (the function was carried out by the Board of Directors)

R 3.4.2 The Remuneration Committee made a proposal for the system of remuneration for the boards and the executive management (individual levels and the structure of remuneration), and carries out its monitoring.

No (the function was carried out by the Board of Directors)

R 3.4.3 The remuneration of the executive management was approved by the Managing Body based on the recommendation of the Remuneration Committee.

Yes (But there is no Remuneration Committee at Company, the function is carried out by the Board of Directors)

The remuneration of the Managing Body was approved by the general meeting based on the recommendation of the Remuneration Committee.

Yes (But there is no Remuneration Committee at Company, the recommendation was made by the Board of Directors)

The Remuneration Committee also monitored the share option, cost reimbursement and other benefits in the remuneration system.

N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors)

R 3.4.4 The Remuneration Committee made proposals regarding remuneration guidelines.

N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors)

R 3.4.4.1 The Remuneration Committee made proposals regarding the remuneration of individual persons.

N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors)



- R 3.4.4.2 The Remuneration Committee reviewed the terms and conditions of contracts concluded with the members of the executive management.
N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors)
- R 3.4.4.3 The Remuneration Committee ascertained whether the company fulfilled its disclosure obligations regarding remuneration issues.
N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors)
- R 3.4.7 The majority of the members of the Remuneration Committee are independent.
N/A (There is no Remuneration Committee at Company, the function is carried out by the Board of Directors, the majority of the members of the Board of Directors are independent)
- R 3.5.1 The Managing Body disclosed its reasons for combining the Remuneration and Nomination Committees.
N/A (there are no such committees)
- R 3.5.2 The Managing Body carried out the duties of the Nomination Committee and disclosed its reasons for doing so.
Yes (but did not disclose public information)
- R 3.5.2.1 The Managing Body carried out the duties of the Remuneration Committee and disclosed its reasons for doing so.
Yes (but did not disclose a public information)
- R 4.1.1 In its disclosure guidelines, the Managing Body established those principles and procedures which ensure that all relevant information about the operations of the company and circumstances influencing its share price are disclosed and made available accurately, in a timely fashion and in full.
Yes (The Board of Directors ensures that all relevant information regarding the company, and information influencing the company's share price are disclosed in due time, accurately and in full. Exception to this is information, which is regarded a business secret, based on the well-founded interest of the Company or its business partners.
- R 4.1.2 The company ensured in its disclosure activities that all shareholders and market participants were treated equally.
Yes (Complies)
- R 4.1.3 The company's disclosure guidelines include the procedures governing electronic, on-line disclosure.
No (there is no independent guideline, the Company acts according to the relevant regulations)
- The company develops its website taking into consideration disclosure guidelines and the provision of information to investors.
Yes (Complies)
- R 4.1.4 The Managing Body assessed the efficiency of disclosure processes.
Yes (Complies)
- R 4.1.5 The company published its corporate events calendar on its website.



Yes (Complies)

R 4.1.6 In the annual report and on the website of the company, the public was informed about the company's corporate strategy, its main business activities, business ethics and its policies regarding other stakeholders.

Yes (Complies)

R 4.1.8 In the annual report the Managing Body disclosed the character and size of any other assignments given by the company or its subsidiaries to the auditing firm responsible for auditing the financial statements.

Yes (Complies)

R 4.1.9 In the annual report and on the website the company discloses information on the professional career of the members of the Managing Body, the Supervisory Board and the executive management.

Yes (Complies)

R 4.1.10 The company provided information on the internal organisation and operation of the Managing Body and the Supervisory Board.

Yes (Complies)

R 4.1.10.1 The company provided information on the criteria considered when evaluating the work of the Managing Body, the executive management and the individual members thereof.

No (the Company did not form separate criteria, the evaluation is carried out based on the common business practice)

R 4.1.11 In the annual report and in the Remuneration Statement on the company's website, the company informed the public about the applied remuneration guidelines, including the remuneration and fees provided for members of the Managing Body, the Supervisory Board and the executive management.

Yes (Complies)

R 4.1.12 The Managing Body disclosed its risk management guidelines, including the system of internal controls, the applied risk management principles and basic rules, as well as information about major risks.

No (the size of the Company did not necessitate the setting out of independent guidelines; risk management is part of the common business planning and operation, without separate guidelines)

R 4.1.13 In order to provide market participants with information, the company publishes its report on corporate governance at the same time that it publishes its annual report.

Yes (the report on corporate governance is part of the submissions for the general meeting)

R 4.1.14 The company discloses its guidelines governing insiders' trading in the company's securities on its website.

Yes (Complies)

The company published in the annual report and on its website ownership in the company's securities held by the members of the Managing Body, the Supervisory Board and the executive management, as well as any interests held in share-incentive schemes.

Yes (Complies)

R 4.1.15 In the annual report and on its website, the company disclosed any relationship between members of the Managing Body and the executive management with a third party, which might have an influence on the operations of the company.

Yes (Complies)



Level of compliance with the Suggestions

S 1.1.3	The company has an investor relations department.	Yes
S 1.2.1	The company published on its website the summary document regarding the conducting of the general meeting and the exercise of shareholders' rights to vote (including voting via proxy)	Yes
S 1.2.2	The company's articles of association are available on the company's website.	Yes
S 1.2.3	The company disclosed on its website information according to 1.2.3 Hiba! A hivatkozási forrás nem található. (on the record date of corporate events).	Yes
S 1.2.4	Information and documents according to 1.2.4 regarding general meetings (invitations, proposals, draft resolutions, resolutions, minutes) were published on the company's website.	Yes
S 1.2.5	The general meeting of the company was held in a way that ensured the greatest possible shareholder participation.	Yes
S 1.2.6	Additions to the agenda were published within 5 days of receipt, in the same manner as the publication of the original invitation for the general meeting. N/A (there were none)	N/A
S 1.2.7	The voting procedure applied by the company ensured unambiguous, clear and fast decision-making by shareholders.	Yes
S 1.2.11	At the shareholders' request, the company also provided information on the general meeting electronically.	Yes
S 1.3.1	The identity of the chairman of the general meeting was approved by the company's general meeting prior to the discussion of the items on the agenda.	Yes
S 1.3.2	The Managing Body and the Supervisory Board were represented at the general meeting.	Yes
S 1.3.3	The company's articles of association render possible that at the initiation of the chairman of the Managing Body or the shareholders of the company, a third party be invited to the company's general meeting and be granted the right of participation in the discussion of the relevant items on the agenda.	No
S 1.3.4	The company did not prevent shareholders attending the general meeting from exercising their rights to request information, make comments and proposals, and did not set any pre-requisites to do so.	Yes
S 1.3.5	The company published on its website within three days its answers to those questions which it was unable to answer satisfactorily at the general meeting. Where the company declined to give an answer it published its reasons for doing so. N/A (there were none)	N/A
S 1.3.6	The chairman of the general meeting and the company ensured that in answering the questions raised at the general meeting, national laws and regulations of the Stock Exchange pertaining to disclosure were complied with.	Yes



S 1.3.7	The company published a press release and held a press conference on the decisions passed at the general meeting.	No
S 1.3.11	The company's general meeting decided on the different amendments of the articles of association in separate resolutions. N/A (there were none)	N/A
S 1.3.12	The minutes of the general meeting containing the resolutions, the presentation of draft resolutions, as well as the most important questions and answers regarding the draft resolutions were published by the company within 30 days of the general meeting.	Yes
S 1.4.1	The dividend was paid within 10 days to those shareholders who had provided all the necessary information and documentation.	Yes
S 1.4.2	The company disclosed its policy regarding anti-takeover devices.	Yes
S 2.1.2	The rules of procedure define the composition of the Managing Body and all procedures and protocols for the preparation and holding of meetings, the drafting of resolutions and other related matters.	Yes
S 2.2.1	The rules of procedure and the work schedule of the Supervisory Board gives a detailed description of its operation and duties, as well as procedures and processes which the Supervisory Board followed. N/A (there were none)	N/A
S 2.3.2	Board members had access to the proposals of a given meeting at least five days prior to the board meeting.	Yes
S 2.3.3	The rules of procedure regulate the regular or occasional participation at board meetings of persons who are not members of the boards.	Yes
S 2.4.1	The election of the members of the Managing Body took place in a transparent way, information on candidates was made public at least five days prior to the general meeting. N/A (there were none)	N/A
S 2.4.2	The composition of boards and the number of members complies with the principles specified in 2.4.2.	Yes
S 2.4.3	Newly elected, non-executive board members were able to familiarize themselves with the structure and operations of the company, as well as their duties as board members through a tailored induction programme. N/A (there were none)	N/A
S 2.5.2	The separation of the responsibilities of the Chairman of the Managing Body from those of the Chief Executive Officer has been outlined in the basic documents of the company.	Yes
S 2.5.3	The company has published a statement about the means it uses to ensure that the Managing Body gives an objective assessment of the executive management's work where the functions of Chairman and CEO are combined. N/A (the Company is not planning to combine the functions of Chairman and CEO)	N/A



S 2.5.5	The company's Supervisory Board has no member who held a position in the Managing Body or the executive management of the company in the three years prior to his nomination. Yes (there is no Supervisory Board, members of the Audit Committee never held a position in the executive management)	Yes
S 2.7.5	The development of the remuneration system of the Managing Body, the Supervisory Board and the executive management serves the strategic interests of the company and thereby those of the shareholders.	Yes
S 2.7.6	In the case of members of the Supervisory Board, the company applies a fixed amount of remuneration and does not apply a remuneration component related to the share price. (Instead of a Supervisory Board the Company has an Audit Committee)	Yes
S 2.8.2	The Managing Body developed its risk management policy and regulations with the cooperation of those executives who are responsible for the design, maintenance and control of risk management procedures and their integration into the company's daily operations. No (because there are no independent regulations)	No
S 2.8.10	When evaluating the system of internal controls, the Managing Body took into consideration the aspects mentioned in 2.8.10. N/A (there is no separate internal controls at the Company)	N/A
S 2.8.12	The company's auditor assessed and evaluated the company's risk management systems and the risk management activity of the executive management, and submitted its report on the matter to the Audit Committee / Supervisory Board.	Yes
S 2.9.1	The rules of procedure of the Managing Body cover the procedure to be followed when employing an external advisor. No (but there was no external advisor for the Board of Directors)	No
S 2.9.1.1	The rules of procedure of the Supervisory Board cover the procedure to be followed when employing an external advisor. No (but there is no Supervisory Board and there was no external advisor for the Audit Committee)	No
S 2.9.1.2	The rules of procedure of the Audit Committee cover the procedure to be followed when employing an external advisor. No (but there was no external advisor for the Audit Committee)	No
S 2.9.1.3	The rules of procedure of the Nomination Committee cover the procedure to be followed when employing an external advisor. No (there is no Nomination Committee)	No
S 2.9.1.4	The rules of procedure of the Remuneration Committee cover the procedure to be followed when employing an external advisor. No (there is no Remuneration Committee)	No
S 2.9.4	The Managing Body may invite the company's auditor to participate in those meetings where it debates general meeting agenda items.	Yes



S 2.9.5	The company's Internal Audit function co-operated with the auditor in order to help it successfully carry out the audit. No (there is no separate body for internal audit)	No
S 3.1.2	The chairmen of the Audit Committee regularly inform the Managing Body about the meetings of the committee, and the committee prepared at least one report for the Managing Body and the Supervisory Board in the given business year.	Yes
S 3.1.2.1	The chairmen of the Nomination Committee regularly inform the Managing Body about the meetings of the committee, and the committee prepared at least one report for the Managing Body and the Supervisory Board in the given business year. N/A (There is no such Committee at Company, the function is carried out by the Board of Directors)	N/A
S 3.1.2.2	The chairmen of the Remuneration Committee regularly inform the Managing Body about the meetings of the committee, and the committee prepared at least one report for the Managing Body and the Supervisory Board in the given business year. N/A (There is no such Committee at Company, the function is carried out by the Board of Directors)	N/A
S 3.1.4	The company's committees are made up of members who have the capabilities, professional expertise and experience required to perform their duties.	Yes
S 3.1.5	The rules of procedure of committees operating at the company include those aspects detailed in 3.1.5. Hiba! A hivatkozási forrás nem található.	Yes
S 3.2.2	The members of the Audit Committee / Supervisory Board were fully informed about the accounting, financial and operational peculiarities of the company.	Yes
S 3.3.3	The Nomination Committee prepared at least one evaluation for the chairman of the Managing Body on the operation of the Managing Body and the work and suitability of the members of the Managing Body. N/A (there is no Nomination Committee at Company)	N/A
S 3.3.4	The majority of the members of the Nomination Committee are independent. N/A (there is no Nomination Committee at Company)	N/A
S 3.3.5	The rules of procedure of the Nomination Committee includes those details contained in 3.3.5. N/A (there is no Nomination Committee at Company)	N/A
S 3.4.5	The Remuneration Committee prepared the Remuneration Statement. N/A (there is no Remuneration Committee at Company)	N/A
S 3.4.6	The Remuneration Committee exclusively consists of non-executive members of the Managing Body. N/A (there is no Remuneration Committee at Company)	N/A
S 4.1.4	The disclosure guidelines of the company at least extend to those details contained in 4.1.4. Hiba! A hivatkozási forrás nem található. N/A (there are no independent guidelines)	N/A



	The Managing Body informed shareholders in the annual report on the findings of the investigation into the efficiency of disclosure procedures. (there was no investigation)	N/A
S 4.1.7	The company's financial reports followed IFRS guidelines.	Yes
S 4.1.16	The company also prepares and releases its disclosures in English.	Yes