# "NIKOLA TESLA" AIRPORT BELGRADE No. GD-283/2022 29 April 2022

04/2 No. 1290/13

# QUESTIONNAIRE ON CORPORATE GOVERNANCE PRACTICE FOR ISSUERS

Business name of the Company:	JSC Belgrade Nikola Tesla Airport
Company Headquarters:	BELGRADE, 11180 BELGRADE 59
Company ID number:	07036540
Company TIN	100000539

#### Questionnaire fill-in instructions:

- In addition to the answer YES/NO, it is necessary to describe in more detail the circumstances on the basis of which certain answers were given to the question asked.
- If the source of information for answering a question is an act of the company that is publicly available, it is necessary to indicate the place where the act can be inspected (e.g. the website where the act was published), and if it is an act that is not publicly available state the exact name of the act, the number of the act and the body of the company that passed it.
- If the source of information for an answer is a common practice of society, it is necessary to illustrate the same by specifying a specific example based on which the subject response is formulated.

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1. Has the company adopted its own Corporate Governance Code or has it applied another organization's Corporate Governance Code?		
Answer:	JSC Belgrade Nikola Tesla Airport adopted the text of the Corporate Governance Code of the Serbian Chamber of Commerce, published in the Official Gazette of the Republic of Serbia, number 99/2012, as the code of corporate governance of JSC Belgrade Nikola Tesla Airport (number 05-73/1 of 7 November 2012).	
Website where the applicable text of the Code is publicly available:		
2. Have the applicable corporate governance principles been incorporated into the internal company acts and are they easily available to all stakeholders?		
Answer:	Yes, the principles of corporate governance are contained in the Corporate Governance Code of JSC Belgrade Nikola Tesla Airport and they are easily accessible to the stakeholders.	
The most significant acts on corporate governance and the manner in which they have been made available	the Cornerate Covernance Code of ISC Polarede Nikela Teela Airean	

FORM 04/2 No. 1290/13

4. Does the company publish in its annual reports the information on its compliance of business operations with the corporate governance principles or provide explanations for any departure from the principles, in accordance with Article 368 of the Law on Companies?

Answer:

Yes, JSC Belgrade Nikola Tesla Airport, in accordance with Article 368 of the Law on Companies ("Official Gazette of RS" number 36/2011, 99/2011, 83/2014 - other law, 5/2015, 44/2018, 95/2018, 91/2019 and 109/2021), in its annual reports publishes the compliance of business operations with the corporate governance principles, contained in the Corporate Governance Code published in the Official Gazette of the Republic of Serbia, number 99/2012, and on the website of JSC Belgrade Nikola Tesla Airport <a href="https://www.antb.rs">www.antb.rs</a>

#### **ASSEMBLY AND SHAREHOLDERS**

5. Does the invitation for the general meeting of the assembly of the company contain all the prescribed elements and notifications, including the data on the shareholders' day with data on the shareholders' rights to participate in the operations of the assembly and propose the agenda, with timeframe for exercising these rights, as well as the description of voting procedures by proxy, absentee voting or voting electronically?

Answer:

Yes, the invitation for the general meeting of the assembly contains all the elements and notifications prescribed by the Law on Companies ("Official Gazette of RS" number 36/2011, 99/2011, 83/2014-other law, 5/2015, 44/2018, 95/2018, 91/2019 and 109/2021) and the Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 – consolidated text)

6. Has the invitation for the general meeting of the assembly of the company, with all relevant explanations and notifications been submitted to the Stock exchange for the purpose of publishing in the regulated market, i.e. MTP Belex, immediately after it has been sent (published) to the shareholders?

Answer:

Yes, the delivery of invitations for the general meeting of the assembly of JSC Belgrade Nikola Tesla Airport to the Belgrade Stock Exchange was done within the deadline and in the manner prescribed by the Law on Companies ("Official Gazette of RS", No. 36/2011, 99/2011, 83/2014 – other law, 5/2015, 44/2018, 95/2018, 91/2019 and 109/2021) and the Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 – consolidated text)

Specify whether and how long after sending the invitation to shareholders, it was submitted to the Stock exchange for the purpose of publication?

The invitation for the general meeting of the assembly of JSC Belgrade Nikola Tesla Airport was published on the website of Belgrade Stock exchange on the same day as in the daily newspapers.

7. Are the materials for the general meeting of the assembly of the company available on the company's website?

Answer:

Yes, materials for the general meeting of the assembly of the company are available on the company's website (www.antb.rs). Furthermore, the materials are available to shareholders in full at the headquarters of JSC Belgrade Nikola Tesla Airport and can be picked up in person or through a proxy every working day during regular business hours from 7.30 to 15.30

Specify how the materials for the general meeting of the assembly of the company are available to the shareholders, if they are not available on the company's website

8. Has the company established some of the legally prescribed possibilities for online participation in the assembly activities, and if so, in which manner?

Answer:

JSC Belgrade Nikola Tesla Airport has not established possibilities for online participation in the activities of the Assembly of JSC Belgrade Nikola Tesla Airport.

9. Does the Company publish the adopted decisions and minutes of the general meeting of the assembly immediately, i.e. within prescribed deadlines after the general meeting?

Answer: Yes, JSC Belgrade Nikola Tesla Airport publishes the adoptions and minutes of the account publishes the adoption of the account publishes are also account to the account publishes and account publishes are also account to the account publishes and account publishes are also account to the account publishes are also accou		
decisions and minutes of the general meeting within prescri deadlines after the general meeting of the assembly.	ted bed	
Specify the ways in which the company provided information to shareholders and public on given issues through the website of JSC Belgrade Nil Tesla Airport www.antb.rs, and the updated data are also submit to the Belgrade Stock Exchange.	kola tted	
10. What materials, decisions and other relevant documents related to the assembly of the company, if any, are also prepared and published in English?		
Yes, the invitation for the general meeting of the assembly, abservoting form, proxy voting and information on the held genmeeting of the assembly, Financial reports, Business report, are report with decisions on the adoption of these reports	eral	
11. Has the Company adopted the Rules of Procedure of the assembly, and does the same or another act of the company contain rules and procedures that ensure that shareholders receive a timely answer to all relevant questions within the assembly of the company?		
Yes, JSC Belgrade Nikola Tesla Airport adopted the Rules  Procedure of the Assembly, number 21-12/3 of 28 June 2012, wh set the rules of procedure and manner of operation of the assem of the shareholders.	nich	
Specify whether the company has ensured and in which manner that all shareholders are continuously provided with information on all applicable rules and procedures  The website of JSC Belgrade Nikola Tesla Airport includes all relevant to shareholders of JSC Belgrade Nikola Tesla Airport.	the	
12. Has the company clearly defined its dividend policy and the procedures and deadlines their payment?	for	
Yes, the payment of dividends, procedures and deadlines for the payment are regulated by the Law on Companies ("Official Gaze of RS" number 36/2011, 99/2011, 83/2014 – other law, 5/204/2018, 95/2018, 91/2019 and 109/2021) and the Statute of Belgrade Nikola Tesla Airport (number: 361 of 5 February 201 consolidated text).	ette )15, JSC 9 –	
13. In the previous year, did the company issue shares with a restriction of the shareholders' right to pre-emptive purchase of new issues of the company's shares?		
Answer: No.		
14. Has the Company established a mechanism for prevention and settlement of possible conflicts between the shareholders and the company?		
Answer: No.		
Specify how shareholders have been notified about these / procedures		
15. When electing members of the company's board, does the assembly have at its disposal comprehensive information on the proposed candidates, and especially information on the existence and nature of relations with the company, related parties, competitive companies and the company's main business partners?		
Answer: Yes. When electing members of the Supervisory Board, the Assem	bly	
has at its disposal comprehensive information on the propos	Jea	
Answer:  has at its disposal comprehensive information on the propose candidates.  16. Are the shareholders enabled to exercise their right to participate in the activities a decision-making of the assembly of the shareholders without restrictions?	į	

FORM 04/2 No. 1290/13

Specify the conditions concerning shareholders' participation in the Assembly of the company (e.g. number of shares in their possession)

Shareholders who own more than 0.1% of shares have the right to participate in the work and decision-making of the Assembly, or if they own a smaller number of shares, they can associate and thus exercise their rights, all in accordance with the Law on Companies.

#### **COMPANY BOARD AND EXECUTIVE DIRECTORS**

17. What is the established management system in the company?

One-tier system – Board of !

One-tier system – Board of Directors (indicate Board members details, with the following indications: executive, nonexecutive and independent directors, and the information on the Board Chairman)

Supervisory Board of JSC Belgrade Nikola Tesla Airport consists of:
-Vesna Stanković Jevdjević, graduated economist, Chairman of the Supervisory Board:

Two-tier system – indicate Supervisory board members details, with the indication of the independent member, and the information on the Board chairman -Srdjan Minić, graduated economist, member of the Supervisory Board:

-Dragoslav Stanković, professional manager, member of the Supervisory Board;

-Petar Jarić, graduated economist, member of the Supervisory Board;

-Goran Mirković, Master of Economics, member of the Supervisory Board.

18. Are the competences of the company's board of directors, i.e. the company's supervisory board more precisely determined by the company's acts?

Answer:

Yes, the Statute of JSC Belgrade Nikola Tesla Airport (No. 361 of 5 February 2019 – consolidated text) and the Rules of Procedure on the work of the Supervisory Board (number 05-7/2 of 28 June 2012) precisely established the competence of the Supervisory Board.

19. Are the company's acts determined by the criteria that define the necessary professional knowledge and experience and other conditions for the appointment of a person as a member of the company's board?

Yes, Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 – consolidated text) determines that:

A member of the Supervisory Board cannot be a person:

- who is a director or a member of the Supervisory Board in more than five companies;
- who has been convicted of a criminal offense against the economy, during a period of five years counting from the day the verdict becomes final, provided that the time spent serving a prison sentence is not included in that period;
- to whom the imposed security measure is a ban on performing activities that represent the predominant activity of the Company, during the duration of that ban.

Answer:

A member of the Executive Board must have a university degree and managerial or organizational skills, and the Managing Director - Chairman of the Executive Board, among other things, must additionally meet the following requirements:

- to have at least five years of work experience in jobs for which higher education is required;
- to have at least three years of work experience in jobs related to the Company's business;
- to know the field of corporate governance;
- to have work experience in organizing work and conducting business;
- that he/she is not a member of the body of a political party, i.e. that he/she has been suspended from performing his/her function in the body of a political party;

FORM 04/2 No. 1290/13

- that he/she has not been sentenced to imprisonment of at least six months and that he/she has not been imposed security measures in accordance with the law governing criminal offenses.

20. Does the board of the company analyze and evaluate the quality and efficiency of its work at least once a year, and propose measures and activities for its improvement and report to the shareholders on those measures?

Answer:

Yes. Every year, the Supervisory Board submits to the Assembly of Shareholders of JSC Belgrade Nikola Tesla Airport a Report on the work of the Supervisory Board, which analyzes the quality and efficiency of its work and informs the shareholders about all decisions made and activities undertaken.

21. Are independent directors, i.e. independent members of the supervisory board obliged, and in what way, to inform the company and shareholders about all changes that may affect their status regarding independence?

Answer:

Yes. Members of the Supervisory Board submit to JSC Belgrade Nikola Tesla Airport data on all changes that may affect their status in terms of independence, and which JSC Belgrade Nikola Tesla Airport submits to the Anti-Corruption Agency.

22. Has the company's assembly adopted a transparent and publicly available policy of rewarding members of the company's board and does the amount of compensation of members of the company's board depend on their contribution to achieving financial and non-financial results and business goals of the company?

Yes, by the Decision of the Assembly of Shareholders number 21-4/1 of 14 February 2014, the amount of reimbursement for the work of the members of the Supervisory Board of JSC Belgrade Nikola Tesla Airport was determined.

Answer:

The amount of the compensation is harmonized with the recommendation according to the Conclusion of the Government of RS No. 120-4780/2008 and the Law on temporary regulation of bases for calculation and payment of salaries, i.e. salaries and other permanent incomes with users of public funds and does not depend on their contribution to financial and nonfinancial results and business objectives of the Company. The mentioned decision of the Assembly is still in force and is being applied, although the Law on Termination of the Law on Temporary Regulation of Bases for Calculation and Payment of Salaries, i.e. Salaries and Other Permanent Income with Users of Public Funds was adopted ("Official Gazette of RS", No. 86 of 6 December 2019).

23. In addition to the legally obligatory audit commission, has the company's board formed other commissions, i.e. other expert advisory bodies?

Answer:

No.

State the name of the commissions, i.e. bodies if they are formed, with the number of members and the description of the tasks entrusted to them, and the acts of the company by which these bodies were formed and which regulate their competence.

24. Is the reimbursement paid to the members of the company's board of directors included in the policy of rewarding the members of the company's board of directors, i.e. determined within the framework defined by the company's assembly?

Answer:

Yes, by the Decision of the Assembly of Shareholders number 21-4/1 of 14 February 2014, reimbursement is defined for the work of members of the Supervisory Board in the amount of one-time total salary per employee without taxes and contributions, which was paid in the Republic of Serbia according to the latest data published by the Statistical Office of the Republic of Serbia.

To the member of the Audit Committee - certified auditor, the reimbursement is paid in accordance with the Decision of the Assembly of JSC Belgrade Nikola Tesla Airport number 21-11/1 of 27 June 2013 and Contract number 09-17/2013 of 8 August 2013.

Members of the Supervisory Board of JSC Belgrade Nikola Tesla Airport who are also members of the Audit Committee are remunerated for their work in the Supervisory Board of JSC Belgrade Nikola Tesla Airport, and not especially for work in the Audit Commission - formed by the Supervisory Board of JSC Belgrade Nikola Tesla Airport.

25. Are the authorizations and responsibilities of executive directors clearly defined by company acts?

Answer:

Yes

Specify the acts of the company that regulate these issues. In companies with a one-tier management system, state in what way and by which acts the tasks and authorizations between executive and nonexecutive in the two-tier management system whether an executive board has been formed.

Yes, the authorizations and responsibilities of the Executive Directors are defined by the Statute of the JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 - consolidated text), and the Rulebook on Internal Organization and Systematization of Work directors are delimited. Indicate Positions in JSC Belgrade Nikola Tesla Airport No. 145/1 of 21 January 2019.

26. Do the company's acts establish the criteria that define the necessary professional knowledge and experience and other conditions for the appointment of a person as an executive director?

Answer:

Yes, the criteria for appointing the executive directors were defined by the Statute of the JSC Belgrade Nikola Tesla Airport (number: 361) of 5 February 2019 - consolidated text) and the Rulebook on Internal Organization and Systematization of Work Positions in JSC Belgrade Nikola Tesla Airport number: 145/1 of 21 January 2019.

27. Has the process of evaluation of the work of executive directors been established and implemented by nonexecutive directors in the board of directors, i.e. the supervisory board in companies with a two-tier management system?

Answer:

Yes, based on available information

28. Does the reimbursement of the members of the executive board consist of a fixed and a variable part (bonuses, incentives, etc.) depending on the contribution to the achievement of financial and non-financial results and business goals of the company?

Answer:

No, the reimbursement for members of the Executive Board does not consist of a fixed and a variable part. Members of the Executive Board are employed for an indefinite period of time in JSC Belgrade Nikola Tesla Airport and receive a monthly salary for the work performed in accordance with the Employment Contract and the Rulebook on Work (No. 75 of 11 January 2019).

Article 44 of the Rulebook on work of JSC Belgrade Nikola Tesla Airport determines the possibility of paying incentives to employees for work results, which can amount to 30% of the employee's basic salary, and the Supervisory Board decides on incentives for appointed persons, i.e. members of the Executive Board, work results and the amount.

29. Does the company have effective mechanisms in place to ensure true, timely, comprehensive and equal reporting of company board members by executive directors, that is, how is the procedure for reporting of nonexecutive directors, i.e. supervisory board members on all issues affecting business, financial position and potential risks to the state of the company's assets regulated?

Vos. the procedure of reporting of the Company's assets.

Answer:

Yes, the procedure of reporting of the Supervisory Board by executive directors is regulated by the Law on the capital market ("Official Gazette of RS ", No. 31/2011 and 112/2015, 108/2016, 9/2020 and 153/2020), the Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 – consolidated text), the Rulebook on accounting and accounting policies of JSC Belgrade Nikola Tesla Airport number DNO-9/2022 of 4 March 2022.

30. Do the executive directors report to the company's board on issues referred to in Article 416 of the Law on Companies, especially in terms of giving a qualitative opinion and analysis of significant issues that determined the company's operations in the reporting period, with vision and analysis of significant business risks and future long-term and short-term prospects?

Answer:

Yes, the executive directors at the meetings of the Supervisory Board report to the Supervisory Board on the business policy, operations, revenues and financial condition of JSC Belgrade Nikola Tesla Airport, as well as on other issues related to their work.

List the issues on which the reporting of the company's board was realized

The Supervisory Board is regularly informed about the planned business policy and about the Company's operations through financial statements on revenues and financial condition of the Company, about business events that are important for the operations of JSC Belgrade Nikola Tesla Airport.

31. Is the function of the secretary of the company organized in the company, and if so, what are the closer duties and responsibilities entrusted to him/her?

Yes, the function of the Secretary of the Company has been organized and he/she has been entrusted with the following duties:

- to prepare the general meeting of the Assembly and keep the minutes:
- to prepare and independently make draft decisions for the Assembly of the Company;
- to prepare the general meeting of the Executive Board and keep minutes;
- to prepare the general meeting of the Supervisory Board and keep minutes;
- to prepare and independently make draft decisions for the general meetings of the Supervisory Board;
- to monitor and apply regulations from the scope of work of the Company's bodies;
- Keeping all materials, minutes and decisions from the meetings of the Company's bodies;
- to perform communication of the Company with shareholders and provide insight to shareholders in acts and documents that the Company is required to make available to them by law (posting these acts and documents on the Company's website so that they can be downloaded in electronic form);
- to perform other tasks in accordance with the decision on appointment;

Answer:

- to organize the work process in accordance with the regulations, internal acts of the Company and the adopted business policy of the Company and the adopted Business Plans of the Company, all with the aim of improving the business of the Company;
- to ensure efficient and legal execution of tasks;
- to coordinate professional work on tasks for which he/she is responsible;
- Communication and coordination of the Company with the corporate agent;
- Communication and coordination of the Company with the Belgrade Stock Exchange;
- Communication and coordination of the Company with the Securities Commission;
- Communication and coordination of the Company with the Business Registers Agency;
- Communication and coordination of the Company with the Anti-Corruption Agency;
- Participation in the process of drafting general acts of the Company;
- Giving legal opinions regarding the application of general acts of the Company;
- Providing professional assistance to the bodies of the Companies;
- Authorized to sign internal acts in the field of work, to dispose of personal data of members of the Assembly of the Company, Supervisory Board and Executive Board, and in the function of work and tasks, to provide insight to the joint stock company in acts and documents that the Company is obliged to provide.

The Secretary of the Company is responsible for all tasks for which he/she is competent to perform, i.e. for the duties entrusted to him/her.

## SUPERVISION AND CONTROL

### 32. Is there the Audit Committee in the company?

Answer:

Yes. The Supervisory Board of JSC Belgrade Nikola Tesla Airport has formed the Audit Committee.

Specify the composition of the audit committee, and whether the chairman of the committee is an independent director / supervisory board, as well as whether at least one member of the committee is a certified auditor appointed by the company's assembly?

Petar Jarić, Chairman of the Audit Committee Dragoslav Stanković, Member Nevenka Aničić, Certified Auditor

## 33. Are there any formed bodies in the company, i.e. appointed persons who perform internal supervision activities?

Answer:

Yes

Specify the Company act governing these issues and specify requirements for appointing the person in charge of these tasks, as well as the data of the person performing these duties and the person who fulfils the requirements defined for the internal auditor in accordance with the law.

The Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 - consolidated text) regulates the issues of internal supervision, in accordance with Article 451 of the Law on Companies and the Law on Audit.

Article 50 of the Statute of JSC Belgrade Nikola Tesla Airport defines the conditions for the appointment of a person who manages internal supervision, which states that a person employed in internal supervision must meet the requirements prescribed for internal auditor, in accordance with the Law governing accounting and audit and cannot be a director or a member of the Supervisory Board at

the same time.

By the decision of the Supervisory Board number 33-04/1 of 18 January 2016, Snežana Batrićević was appointed as a person in the internal supervision of JSC Belgrade Nikola Tesla Airport - in the position of head of internal audit.

In accordance with the Rulebook on Internal Organization and Systematization of Work Positions in JSC Belgrade Nikola Tesla Airport number 145/1 of 21 January 2019, the tasks of the independent function of internal supervision are performed by the internal auditor.

Internal Auditor Snežana Batrićević meets the requirements prescribed by the Law on Companies and the Law on Audit (certified internal auditor - certificate of the Chamber of Certified Auditors of Serbia No. 235/09 of 12 February 2009 and certified internal auditor in the public sector - certificate of the Ministry of Finance No. 153-03 -112/2012-19 of 3 October 2012).

The internal act which determines the role, authorizations, and responsibilities of the internal auditor in JSC Belgrade Nikola Tesla Airport is the Charter of Internal Audit of JSC Belgrade Nikola Tesla Airport No. 916/1 of 8 April 2019 which is updated every year in accordance with IIA Standards.

34. Do the Company acts more specifically regulate the issues under Article 452 of the Law on Companies?

Answer:

Issues under Article 452 of the Law on Companies ("Official Gazette of RS" number 36/2011, 99/2011, 83/2014 — other law, 5/2015, 44/2018, 95/2018, 91/2019 and 109/2021) are more closely defined by the Statute of JSC Belgrade Nikola Tesla Airport — Article 50, the Rulebook on Internal Organization and Systematization of Work Positions at JSC Belgrade Nikola Tesla Airport, number 145/1 of 21 January 2019, as well as with the Charter of Internal Audit JSC Belgrade Nikola Tesla Airport, which lists the obligations of internal auditor, as well the manner and reporting deadlines to the Audit Committee and Supervisory Board.

Specify how the mutual rights and obligations of the persons for internal supervision and the audit committee/board of the company are regulated, especially in the part of reporting

The rights and obligations of the persons for internal supervision and the Audit Committee, which refer to reporting, are regulated by the Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 - consolidated text), while the role, authorizations and responsibilities of the internal auditor in JSC Belgrade Nikola Tesla Airport, mutual rights and obligations of the internal auditor and the Audit Committee/Supervisory Board, as well as reporting to the Audit Committee and the Supervisory Board, defined in the Charter of Internal Audit of JSC Belgrade Nikola Tesla Airport No. 916/1 of 8 April 2019, which is updated every year in accordance with IIA Standards. The Internal Auditor is obliged to submit to the Audit Committee and the Supervisory Board for approval/adoption the established and updated internal audit regulations, strategic and annual internal audit plan, periodically report on performed audits and submit an annual report on the work of the internal auditor by the end of January of the current year for the previous year.

35. Are mechanisms and rules for the implementation of supervision and control defined at the level of company, as well as indicators of activities that should especially indicate to internal supervision the need for the implementation of preventive supervision and control?

Answer:

In accordance with the law and bylaws - Article 82 of the Law on Budget System, Articles 451 and 452 of the Law on Companies, Rulebook on common criteria for organization and standards and methodological instructions for acting and reporting on internal audit in the public sector and Article 50 of the Statute of JSC Belgrade Nikola Tesla Airport, the Company has defined the manner

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of introduction and implementation of internal supervision and control. The adopted Charter of Internal Audit of JSC Belgrade Nikola Tesla Airport defines the role, authorizations and responsibilities of the internal audit function.

Mechanisms and rules for conducting supervision and control are defined in the Internal Audit Procedures approved by the Audit Committee and adopted by the Supervisory Board of JSC Belgrade Nikola Tesla Airport. The procedures are in line with the Rulebook and Methodology of conducting the internal audit of the Ministry of Finance - Central Harmonization Unit.

In accordance with bylaws and International Standards on Internal Auditing, the internal auditor performs risk assessment and based on that adopts the Strategic and Annual Internal Audit Plan of JSC Belgrade Nikola Tesla Airport, which is approved by the Audit Committee and adopted by the Company's Supervisory Board.

Based on the Annual Internal Audit Plan, the internal auditor conducts assurance audits and consulting audits aimed at improving operations and pointing out the functioning of the internal control system, which is directly reported by the Company's Supervisory Board, in accordance with laws, bylaws and internal regulations, International internal audit standards and adopted procedures. The Internal Audit Charter also defines that upon the order of the Supervisory Board, preventive supervision can be performed, which

is carried out through the advisory engagement of internal audit.

36. Does the internal supervisory system also include matters related to insider information?

Answer:

Activities related to insider information are covered by the Rulebook on Insider Information No. GD – 843/2021 of 22 October 2021.

37. Does the External Auditor of the Company inform the Audit Committee on the issues pursuant to Article 453 of the Law on Companies?

Answer:

Yes, the External Auditor informs the Audit Committee on the issues pursuant to Article 453 of the Law on Companies ("Official Gazette RS" number 36/2011, 99/2011, 83/2014 — other law, 5/2015, 55/2018, 95/2018, 91/2019 and 109/2021).

Specify the methods communication between external auditor and company's audit committee

of :

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The External Auditor of the Company submits a Statement of Independence confirming their independence in relation to JSC Belgrade Nikola Tesla Airport, and states all types of services performed for the Company in addition to the audit of financial statements, i.e. confirms that they did not provide additional services apart from audit.

38. Does the external auditor also compile a special internal document to the company's board (letter to the management board) which includes significant weaknesses identified in the control procedures, accounting and operational procedures of the company, with suggestions for their improvement?

Answer:

Yes, the Independent Auditor's Opinion and Independent Auditor's Report.

39. Does the external auditor attend the general meetings of the assembly at which the report on the performed audit of the company's financial statements is considered?

Answer

Yes. The External Auditor attends the regular general meetings of the Assembly of Shareholders, at which the report on the performed audit of the financial statements of JSC Belgrade Nikola Tesla Airport is considered and adopted.

#### TRANSPARENCY AND PUBLICITY

40. Does the company have a clearly defined and publicly available reporting policy that defines the principles, rules and procedures for reporting to shareholders, competent authorities, the public and all stakeholders?

Answer:

Yes, the principles and procedures of reporting to shareholders, competent authorities and the public are defined by laws, bylaws, the Statute of JSC Belgrade Nikola Tesla Airport (number: 361 of 5 February 2019 - consolidated text) and the rules of the Belgrade Stock Exchange.

41. Does the company publish business reports with the report of the external auditor in accordance with the law, bylaws and rules of the Stock Exchange?

Answer:

Yes, the insight can be done on the website of the Belgrade Stock Exchange - www.belex.rs and on the website of JSC Belgrade Nikola Tesla Airport - www.antb.rs.

42. Do the company's business reports include all elements prescribed by the law, notably elements prescribed under Article 289 of the Law on Companies and Article 50 of the Law on Capital Market?

Yes. The business reports of JSC Belgrade Nikola Tesla Airport contain elements prescribed by Article 289 of the Law on Companies, as follows:

- 1) reasons for acquisition;
- type, class, number and nominal value, i.e. book value of shares without nominal value, own shares acquired during 2018, as well as their share in the share capital;

3) the price at which those shares were acquired;

4) type, class, total number and nominal value, i.e. book value of shares without nominal value, own shares of the company at the end of that business year, as well as their share in the share capital of the company.

The answer should include all elements specified in the aforementioned articles

Article 50 of the Law on Capital Market also compiles an annual report containing annual financial reports, auditor's report on the performed audit of annual financial statements and business report, data on acquired own shares in accordance with Article 50, paragraph 4 of the Law on Capital Market, as well as in accordance with paragraph 3 of the same article, the Annual Business Report must contain:

- a credible presentation of the development and results of the company's operations, and in particular the financial condition in which it is, as well as data important for the assessment of the company's assets;
- a description of the expected development of the company in the coming period, changes in the company's business policies, as well as the main risks and threats to which the company's operations are exposed;
- 3) all important business events that occurred after the end of the business year for which the report is being prepared;

4) all significant transactions with related parties;

5) activities of the company in the field of research and development.

43. Does the company, in addition to the information prescribed by the Law on Capital Market, determine and immediately publish other data that may affect the price of the company's shares and the position of shareholders?

Answer:

Yes.

Specify data on published data in accordance with the Law on Capital Market (e.g. changes in significant equity participation; acquisition/disposal of own shares, etc.), as well as other data that affect the price (e.g. business news, shareholder agreements, court proceedings for refuting the

During 2021, the Company published the annual report for 2020 and quarterly reports for the first, second and third quarters of 2021, updated information about the Company, annual document on published information, Decision of the Assembly of Shareholders on the adoption of the annual financial report for 2020, Decision on the adoption of the report on operations for 2020 and the Decision on the distribution of profits or loss coverage for 2020, Invitation to shareholders for the 28th regular general meeting of the Assembly

assembly decisions of the company, etc.)	Assembly of Shareholders, Questionnaire on corporate governance. These reports, information and decisions were published on the Company's website (www.antb.rs), the website of the Belgrade Stock Exchange and submitted to the Securities Commission of the Republic of Serbia	
44. Are up-to-date data o shares/percentage of shares	n company insiders publicly available with data on the number of of the company owned by them?	
Answer:	No, the mentioned data were not published.	
Specify the available data and the location at which they can be accessed	<b>/</b>	
45. Does the company publish biographical data on members of the company's board of directors, executive directors, members of the audit committee and persons in charge of internal supervision?		
Answer:	No.	
Specify where these data are published		
46. Does the company pub persons and related persons	lish data on transactions with related parties and transactions with with special authorizations in the company?	
Answer:	No, JSC Belgrade Nikola Tesla Airport does not have transactions with related parties, and this can be seen in the publicly published data in the Company's Business Report.	
Specify where these data are published	/	
47. Does the company report to the public on individually paid reimbursements and other financial and non-financial rights and benefits achieved by the holders of management, governance and supervision functions in the company, as well as members of the company's board of directors?		
Answer:	JSC Belgrade Nikola Tesla Airport does not publish individually paid reimbursements and other financial and non-financial rights and benefits achieved by the holders of management, governance and supervision in JSC Belgrade Nikola Tesla Airport as well as members of the committees of the board of JSC Belgrade Nikola Tesla Airport.	
Specify where these data are published	JSC Belgrade Nikola Tesla Airport publishes the total amount of reimbursements paid to holders of management, governance and supervision in JSC Belgrade Nikola Tesla Airport as well as members of the committees of the board of JSC Belgrade Nikola Tesla Airport in the Notes to the Financial Statements.	
48. Does the company use it	s own website to publish all relevant information?	
Answer:	Yes. In order to publish all relevant information, JSC Belgrade Nikola Tesla Airport uses its own website.	
Indicate the website	www.antb.rs	
49. Is the company's website organized in such a way as to provide easy access to information relevant to the investor?		
Answer:	Yes. The website of JSC Belgrade Nikola Tesla Airport is organized in a way that provides easy access to important information.	
Specify the manner in which the informing of investors is organized (e.g. whether the website contains special content for investors that can be accessed from the front page of the company)	On the Company's website, within the About Us segment, there is a special section Investors and Shareholders.	

50. Is all relevant investment information published in the English language as well?		
Answer:	Yes.	

STATEMENT – It is hereby stated that the following agreed with the answers contained in this Questionnaire (circle):

- 1) All executive directors and members of the supervisory board of the company,
- 2) all members of the board of directors of the company (executive and nonexecutive directors of the company),

and that the answers to the questions from this Questionnaire are true to the best of their knowledge and that they agree that they can be published on the website of the Belgrade Stock Exchange JSC Belgrade.

Chairman of the Executive Board, Managing Director Saša Vlaisavljević, BScTE

(stamp and signature)

Name and surname of the legal representative