

IDENTIFICATION OF MANAGERS AND PERSONS CLOSELY ASSOCIATED

ISSUER'S AND MANAGER'S OBLIGATIONS



1 The issuer identifies managers

PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES

- Management Board
- Supervisory Board
- Other important person in the company – 3 conditions combined:
 - Senior executive
 - Regular access to inside information
 - Power to take decisions affecting the issuer

2 The issuer notifies managers of their obligations:

- Notification on their transactions relating to the issuer's financial instruments
- Identification of persons closely associated
- Notification of persons closely associated of their obligations and sanctions
- Keeping copies of the notifications
- Informing the issuer about the list of persons closely associated and updating the list without delay



1 The manager draws up a list of persons closely associated by business

PERSONS CLOSELY ASSOCIATED BY BUSINESS

- DISCHARGING MANAGERIAL RESPONSIBILITIES in other entities
- or
- Direct or indirect control
- or
- Entities set up for the benefit of the natural person
- or
- Entities, the economic interests of which are substantially equivalent to those of the natural person

2 The manager notifies in writing persons closely associated by business of their obligations:

- Notification of their transactions relating to the issuer's financial instruments
- Keeping their data up-to-date

3 The manager keeps copies of the notifications

4 The managers transfers the list of persons closely associated by business to the issuer



1 The manager draws up a list of persons closely associated by family

PERSONS CLOSELY ASSOCIATED BY FAMILY

- or
- Spouse or partner
- or
- Dependent child
- Relative who has shared the same household for at least one year

2 The manager notifies in writing persons closely associated by family of their obligations:

- Notification of their transactions relating to the issuer's financial instruments
- Identification of persons closely associated by business
- Keeping the above data up-to-date

3 The manager keeps copies of the notifications

4 The managers transfers the list of persons closely associated by family to the issuer



1 The manager draws up a list of persons closely associated by business with persons closely associated by family

PERSONS CLOSELY ASSOCIATED BY FAMILY

PERSONS CLOSELY ASSOCIATED BY BUSINESS

12 potential connections

2 The manager notifies in writing persons closely associated by business with persons closely associated by family of their obligations:

- Notification of their transactions relating to the issuer's financial instruments
- Keeping their data up-to-date

3 The manager keeps copies of the notifications

4 The manager transfers the list of persons closely associated by business with persons closely associated by family to the issuer



3 The issuer draws up a complete and up-to-date list of:

- MANAGERS
- PERSONS CLOSELY ASSOCIATED BY BUSINESS
- PERSONS CLOSELY ASSOCIATED BY FAMILY
- PERSONS CLOSELY ASSOCIATED BY BUSINESS WITH PERSONS CLOSELY ASSOCIATED BY FAMILY

4 It is recommended that the issuer takes the following actions towards managers and persons closely associated that may probably trade in the issuer's financial instruments:

- Gathering contact data allowing instant contact
- Organizing a seminar on managers' transactions covering at least the following topics:
 - Scope of financial instruments to be notified
 - Types of transactions triggering the notification requirement
 - Procedure of notification
 - Template of notification
- Establishing an email address to be used by the person in the notification procedure