

Based on the provisions of Article 19 of the Statute of the investment company HITA-VRIJEDNOSNICE d.d., Zagreb, (hereinafter: the Company), Kumičićeva 10, the Management Board of the investment company, at the meeting held on December 27<sup>th</sup>, 2022, adopted

## DECISION ON BROKERAGE FEES

### I.

#### Buying and selling shares through HITA INTERNET TRADING for shares on the domestic market

<i>Turnover of the previous quarter*</i>	<i>Brokerage fee</i>	<i>Minimum fee per order</i>
0,00 - 3.981,68 EUR/ 0,00 – 29.999,97 HRK	0,55%	6,64 EUR / 50,03 HRK
3.981,69 - 13.272,28 EUR/ 29.999,98 – 99.999,99 HRK	0,50%	6,64 EUR / 50,03 HRK
13.272,29 - 33.180,70 EUR/ 100.000,00–249.999,98 HRK	0,45%	5,31 EUR / 40,01 HRK
33.180,71 - 66.361,40 EUR/ 249.999,99–499.999,97 HRK	0,40%	5,31 EUR / 40,01 HRK
Over **/ 66.361,41 EUR**/ 499.999,97 HRK	0,35%	3,98 EUR / 29,99 HRK

The brokerage fee includes all costs of the Zagreb Stock Exchange, the Central Clearing Depository Company (CDCC) and SKDD-CCP Smart Clear d.d. (which from January 2022 guarantees DVP for appropriate financial instruments in the contractual settlement) for settlement via the Joint (Omnibus) account.

There is no charge for opening an order. Any change in quantity and/or price constitutes a new order.

Active Clients are provided with a free insight into 20 offers for buying and selling in real time (the most that the XETRA trading system allows) and all transactions, via smartphones, tablets, and computers (iOS, Android, Windows...) and an overview and analysis of the Top 10 shareholders in CDCC.

Active Clients are not charged a fee for insight into stock price movements in real time and annual account management.

The service can be activated for the first time by a Client who has previously performed: a) at least 1 purchase or sale transaction b) registered financial instruments with a minimum market value of EUR 3,981.68/ HRK 29,999.97 c) made a payment of purchase funds to the Company's account.

\*Clients are sorted on the last day of the month depending on turnover in the last three months. The corresponding fee group is applied for trading in the following month.

New clients start trading in the fee group 0.55% minimum 6.64 Eur/ 50.03 HRK.

\*\*Clients who have margin loans with banks that have a contractual relationship with the Company have a fee of 0.35% minimum EUR 6.64/ HRK 50.03 and DVP to the bank is included in the fee.

In the brokerage fee is also included an overview of trading in financial instruments, i.e. records of financial assets in accordance with the Income Tax Act and the Income Tax Ordinance (according to the FIFO method) and an approximate calculation of the income tax base based on capital gains with a separate statement of non-taxable sales, a brochure for filling in the JOPPD form, which can be completed manually for tax obligations from other sources (investment in funds, foreign trading...). The above is sent exclusively to the Client's email address.

## II.

### **Buying and selling shares and rights, in person, by phone, by e-mail**

<i>Order amount</i>	<i>Brokerage fee</i>	<i>Minimum fee per order</i>
EUR 0 -13.272,28 / HRK 0 – 99.999,99	1,30%	19,91 EUR/ 150,01 HRK
EUR > 13.272,28 / HRK > 99.999,99	As agreed	As agreed

The brokerage fee includes all expenses of the Zagreb Stock Exchange, the Central Depository and Clearing Company and SKDD-CCP Smart Clear d.d. The fee is the same for all types of orders and includes orders with hidden quantity (iceberg).

The client whose actions cause the cancellation of the transaction by the Zagreb Stock Exchange, or the market operator is obliged to bear the compensation of the Zagreb Stock Exchange or the market operator in accordance with their price list increased by EUR 39.82/ HRK 300.02.

In the brokerage fee is also included an overview of trading in financial instruments, i.e. records of financial assets in accordance with the Income Tax Act and the Income Tax Ordinance (according to the FIFO method) and an approximate calculation of the income tax base based on capital gains with a separate statement of non-taxable sales, a brochure for filling in the JOPPD form, which can be completed manually for tax obligations from other sources (investment in funds, foreign trading...). The above is sent exclusively to the Client's email address.

## III.

### **Fees for participation in public auctions**

<i>Order amount</i>	<i>Brokerage fee</i>
EUR 0 -132.722,81/ HRK 0 – 1.000.000,01	0,70%
EUR > 132.722,81/ HRK > 1.000.000,01	As agreed

The brokerage fee includes all expenses of the Zagreb Stock Exchange and the Central Depository and Clearing Company. The minimum fee is EUR 66.36/ HRK 499.99 per order.

## IV.

### **Fees for the conduct of public auctions at the Client's order**

<i>Order amount</i>	<i>Brokerage fee</i>
EUR 0 -132.722,81/ HRK 0 – 1.000.000,01	1,50%
EUR > 132.722,81/ HRK > 1.000.000,01	As agreed

The brokerage fee includes the costs of the Central Depository and Clearing Company. The cost of organizing a public auction is EUR 265.45/ HRK 2,000.00 per order, plus expenses (advertisement in the media, notary public...).

## V.

### **Buying and selling bonds**

<i>Order amount</i>	<i>Brokerage fee</i>
EUR > 132.722,81/ HRK > 1.000.000,01	0,30%
EUR > 132.722,81/ HRK > 1.000.000,01	As agreed

The brokerage fee includes all expenses of the Zagreb Stock Exchange and the Central Depository and Clearing Company. The minimum fee is EUR 19.91/ HRK 150.01 per order.

## VI.

### **Settlement of transactions via CDCC**

Receipt and/or delivery of financial instruments without payment or with payment amounts to EUR 6.64/ HRK 50.03 per financial instrument for each receipt/ delivery.

## VII.

### **Fees for sale by order of a court or other competent authority (e.g. enforcement proceedings)**

The brokerage fee for the sale of financial instruments in enforcement proceedings is 2.00% with a minimum brokerage fee per each order of HRK 39.82/300.02 EUR for each financial instrument and does not include the valuation of the company, which is separately agreed upon.

The fee for a simple valuation of smaller companies amounts to a minimum of EUR 1,327.23/ HRK 10,000.01 + VAT and includes one assessment method. Valuation that refers to larger companies and includes several methods is agreed upon individually. Only publicly available data is used for the valuation of companies. The fee for company valuation is paid in advance before starting the valuation and is independent of the success of the sale.

The brokerage fee for organized public auctions is 2.00%, plus the fee for the preparation of the auction in the amount of EUR 663.61/ HRK 4,999.97 and for other costs and taxes.

The company will not start the sales process before the advance payment.

The fee for the sale of business shares in limited companies is 2.00% of the value, and the minimum is EUR 5,308.91/ HRK 39,999.98. The amount of the minimum fee must be paid to the Company's account before the start of the sale.

Other costs are not included in the fee, such as the cost of an advertisement in a newspaper, the cost of a notary public, and other. Sales fees and sales costs are deducted by the Company from the received sales price and paid to the competent authority within one working day from the date of receipt of funds.

## VIII.

### **Buying and selling financial instruments on foreign markets**

<i>Order size</i>	<i>Brokerage fee</i>
In currency EUR	0,30%, cost of transfer* and tax**
In currency USD	0.02 USD per share, transfer*, tax**

The minimum fee is 25 USD or 25 EUR depending on the market, converted into Eur.

\* Bank commission costs for payments abroad and receipt of funds in a foreign bank

\*\* in certain national markets, capital gains tax can be paid.

The minimum amount for trading on foreign markets is equivalent to EUR 1,459.95 / HRK 10,999.99

The commission for the so-called "penny stocks" is agreed on request.

Clients bear the cost of sending/ receiving funds to/ from abroad for trading and for corporate actions (dividends, capital reduction, merger of shares with payment...). Clients bear the cost of receiving/ releasing financial instruments with a foreign broker.

The fee for carrying out corporate actions (dividend payment, merger of shares, conversion of shares, etc.) is EUR 13.27/ HRK 99.98 for each corporate action and financial instrument.

Buying and selling financial instruments on foreign markets is possible by opening an individual Client account (the Client has his own account and the possibility of trading from 0-24 hours). In that case, the company acts as an introducing broker.

## IX.

### **Fee for premature payment**

The fee for premature payment of funds during the sale of financial instruments is calculated in the amount of 1% of the amount of premature paid funds (minimum EUR 19.91/ HRK 150.01). It refers to financial instruments that are in the SKDD-CCP contractual settlement system.

Clients are obliged to check the availability of the service in advance, considering the Company's available funds and financial instruments that are the subject of the transaction.

### **Maintaining an inactive money account**

## X.

The Company is required to send quarterly statements of money account to Client's and once a year statement of financial instruments in accordance with applicable legal regulations, and to keep records of them.

The Company will charge an annual fee for maintaining an inactive money account in the amount of 15.93 EUR/ HRK 120,02 to Clients who have not had a transaction with financial instruments in a period of one year and who have an amount of less than EUR 63.71/ HRK 480.02 in their account. The fee will be calculated twice a year in June and December. Financial instruments may be deregistered from Clients who are charged a fee for maintaining an inactive account. This cost is included in the fee for active clients.

Clients who have less funds than the amount of the annual fee will be charged the amount they have in their account and will not be charged additionally.

## **HITA OTC, OTC, Block transactions and other services**

### **XI.**

The fee for orders on the HITA OTC market is 1.5% of the transaction value with a minimum commission of EUR 23.89/ HRK 179.99. The fee includes the transfer of ownership in SKDD.

The fee for OTC orders is 2.00% of the transaction value with a minimum commission of EUR 26.54/ HRK 199.97.

The fee for block transactions is charged at 1.00% depending on the size of the block and the agreement with the Client.

The fee for transferring financial instruments that are not listed on the Zagreb Stock Exchange (shares, bonds) is 0.10% of the market value or the nominal value, considering the larger amount, with a minimum fee of EUR 26.54/ HRK 199.97.

Fee for maintaining special accounts in SKDD-CCP Smart Clear d.d.:

- Individual account (ISA) – EUR 3,318.07 / HRK 24,999.99 per year
- Additional Joint Account - EUR 1,592.67 / HRK 11,999.97 per year

The additional minimum fee for each order for the Individual and Additional Joint account amounts to EUR 6.64/ HRK 50.03.

Clients for Individual and Additional Joint accounts must provide their own Collateral.

The fee for confirmation for audit purposes (sending to the Client and the auditor) amounts to EUR 26.54/ HRK 199.97 and is increased by the amount of VAT.

## **Final provisions**

### **XII.**

The Company may agree with Clients on prices different from those specified in this Decision on brokerage fees.

The Company will negotiate fees for professional investors and institutional investors individually.

Tied agents of the Company may have different fees from those specified in this Decision on brokerage fees.

For the purposes of dual reporting of prices in the period from the adoption of the Decision on Fees to December 31, 2022 in accordance with the provisions of the Law on the introduction of the Euro (Official Gazette 57/22 and 88/22), fees will be reported informatively and in EUR, which is obtained by applying the fixed conversion rate from article 3 of the Law on the introduction of the Euro (1 EUR = 7.53450 HRK).

### **XIII.**

This Decision applies from January 2<sup>nd</sup>, 2023.

With the entry into force of this Decision, the Decision on brokerage fees from August 17<sup>th</sup>, 2022, ceases to be valid.

HITA-VRIJEDNOSNICE d.d.

Ivan Tadin, CEO