



OKTA CRUDE OIL REFINERY SHAREHOLDING COMPANY - SKOPJE

О К Т А Рафинерија на нафта
Акционерско друштво

Бр. 0202-3057/23-14
28.12.2024 год.
Скопје 1

BUSINESS PROCEDURE

for submitting questions and requesting information

by shareholders / investors of OKTA AD - Skopje

Pursuant to the Corporate Governance Code of the Macedonian Stock Exchange and Article 46 paragraph 1 item 16 of the Charter of OKTA AD - Skopje on its 208th meeting held on 28.12.2023, determined the following:

BUSINESS PROCEDURE

for raising questions and requesting information

by shareholders / investors of OKTA AD - Skopje

1 SUBJECT

- 1.1 This Business Procedure of OKTA AD - Skopje (hereinafter referred to as "the Company") governs the manner and procedure of correspondence between an investor/shareholder and OKTA AD – Skopje outside of the scope of rights of the shareholders related to the Assembly of Shareholders.
- 1.2 Shareholders and investors of the Company are entitled to submit to the Company a specific question or request for information in relation to the operation of the Company or issues that affect their rights or interests as shareholders/investors, within the frames of the applicable legislation, and in a manner regulated in this Procedure.
- 1.3 The communication between the shareholder/investor and the Company shall be in a written form (electronic correspondence or post mail), via the Company's person for contact with investors. Details related to the persons for contact with investors are available on the Company's official webpage and the SEINET platform of the Macedonian Stock Exchange.

2 APPLICATION AND RESPONSIBILITIES

- 2.1 This Business Procedure applies to all investors/shareholders.
- 2.2 The Chief Executive Officer (CEO) of the Company and the Company's person for contact with investors, appointed by the Board of Directors pursuant to Article 32 paragraph 3 of the Listing Rules of the Macedonian Stock Exchange, which reports directly to the CEO, are responsible for the consistent application of this Business Procedure.

3 ACCESS TO DOCUMENTS

3.1 Obligation to keep documents

- 3.1.1 The following documents shall be kept in the registered office of the Company:
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- 1) the statute and the other acts, as well as their amendments, together with the consolidated text;
- 2) the minutes and all other documents from the shareholders assemblies;
- 3) the minutes and the decisions from the meetings of the Board of Directors;
- 4) the annual accounts and the financial reports that have to be kept in accordance with law;
- 5) all attachments (documents and proofs) submitted to the trade registry maintained by the Central Registry of the Republic of North Macedonia;
- 6) all public announcements and prospectuses for issuance of shares and other securities of the Company;
- 7) total written communication of the Company with its shareholders;
- 8) an updated list of names and addresses of all elected members of the Board of Directors
- 9) pledge and mortgage documents;
- 10) the reports of the authorized auditor and of the authorized appraiser;
- 11) the voting ballots and letter of attorneys for participation at the shareholders assemblies in original or copy;
- 12) the collective agreement on the company's level;
- 13) the complete documentation related to the approval of deals with an interested party;
- 14) other acts and documents anticipated by law and the statute of the Company.

3.2 Right to access the documents

3.2.1 Each shareholder of the Company is entitled to inspect the acts and the documents of the Company referred to in sub-section 3.1 above.

3.2.2. The shareholders shall exercise the right to information regarding the minutes and the decisions of the Board of Directors through the non-executive members of the Board of Directors.

3.2.3 The Company can require from the shareholder who is requesting the examination, to inform the Company regarding the examination, within a time period not longer than 3 (three) days prior to the day of the intended examination. The shareholder may be required to cover the costs of the requested copies, which cannot be higher than the actual cost.

3.2.4 The shareholder cannot publicly announce or present the information contained in the documents presented by the Company, except in cases of: (i) presenting information to the shareholders, (ii) exercising right in front of a competent body determined by law, by the statute or other act of the Company, or (iii) if such information is already published.

3.2.5 In order to preserve the confidentiality of its operations or business secrets, the Company may restrict access to the requested documents and shall provide an explanation for this to the shareholder making the request.

4 COMMUNICATION BETWEEN THE COMPANY AND THE SHAREHOLDERS

4.1 Manner of communication of the investor/shareholder with the Company

4.1.1 The shareholder/investor can submit to the Company a specific question or request for information in the following two ways:

4.1.1.1 In writing, by sending a letter addressed to the Person for contact with investors, delivered by postal service to the address of the headquarters of the Company (OKTA Crude Oil Refinery Shareholding Company – Skopje, str. 1 no. 25, Miladinovci, Ilinden) or personally in the Company's archive.

4.1.1.1.1 Attached to the Letter, the investor/shareholder must submit:

- Relevant document verifying the status of investor/shareholder of the Company. If the document is issued in a language other than Macedonian or English, the document must be accompanied by a translation by an official court sworn translator, verified by a notary
- Copy of a valid identification document (personal ID or passport) of the shareholder/investor - natural persons, i.e. of the –legal representative, if the shareholder/investor is a legal entity
- If the investor/shareholder is a legal entity, a copy of a Certificate on current standing issued by the Central Registry or another relevant document containing information on the name of the legal entity, its headquarters and its authorized representative, issued by a authorized body of the foreign state where the headquarters of the shareholder is located, not older than 60 (sixty) days, and in any event containing currently valid information. If the document is issued in a language other than Macedonian or English, the document must be accompanied by a translation by an official court sworn translator, verified by a notary.
- When the Letter is submitted through a proxy, in addition to the respective information for the investor/shareholder, the letter must contain respective information for identification of the proxy and must be accompanied by a photocopy of the issued proxy. The letter must be signed by the investor/shareholder-natural person, the legal representative of the investor/shareholder-legal entity or the proxy.

4.1.1.2 Electronically by sending an e-mail to the designated e-mail address of the Person for contact with investors. Attached to the e-mail, the investor/shareholder must submit scanned copies of the documents specified in item 4.1.1.1.1 above. The Company must confirm the receipt of such e-mail, or otherwise, if confirmation is not received within 3 (three) business days, the investor/shareholder shall submit the question/request in the manner provided in item 4.1.1.1 above.

4.2 Procedure within the Company

- If the Letter is submitted in writing by postal service or delivered personally in the Company's archive, it shall be delivered to the appointed Person for contact with investors immediately after registering, but not later than the next working day.
 - Upon receiving the Letter or the e-mail, the Person for contact with investors inspects if the Letter/e-mail are accompanied by the necessary documents specified in item 4.1.1.1.1. If
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certain documents are missing, the investor/shareholder will be asked to provide them additionally, within no more than 15 days following the receipt of the information from the Person for contact with investors. If the documents are not submitted within the deadline, the investor/shareholder will be informed that the Company cannot proceed with providing a reply.

- If the Letter/e-mail are accompanied by the necessary documents, the Person for contact with investors notifies the Chief executive Officer and immediately, but not later than the next working day forwards the Letter/e-mail to the CEO.
 - Upon receiving the Letter/e-mail, the CEO determines if the question or the request for information are related to the operation of the Company or to issues related to the right and interests of the investor/shareholder AND whether the question or the request are within the frames of the applicable legislation. Furthermore, the CEO determines if by providing an answer to the posed question or by disclosing the requested information, the Company is in risk of breaching any business secret OR a legal or contractual obligation for confidentiality.
 - If the CEO determines that there are obstacles for providing a reply to the posed question or for disclosing the requested information, the Person with contact with investors will be notified of such obstacles and information on the reasons for not providing the reply or disclosing the information shall be sent to the investor/shareholder.
 - If the CEO determines that there are no obstacles for proceeding, the Letter/e-mail is forwarded to the relevant Directorate, Department or other Organizational unit of the Company, with instructions to provide a proposed reply to the CEO in relation to the posed question or to the request for information within no more than 7 days, or within no more than 14 days if a more complex investigation or consultations are necessary.
 - The final reply to the posed question or to the request for information is formulated by the CEO, and is delivered to the Person for contact with investors for further forwarding to the investor/shareholder.
 - If the Chief Executive Officer determines that the question or the request for information should be escalated to the Board of Directors, OR if the investor/shareholder has specifically designated this in the Letter/e-mail, the Chief Executive Officer notifies the Chairman of the Board of Directors immediately, but not later than the next working day. The Board of Directors will discuss the matter and provide a reply or information on its first subsequent meeting, or in urgent cases, the matter will be communicated to all members of the Board of Directors via electronic mail. If the Board of Directors determines that the reply or the information cannot be provided by the Board due to the fact that they are not within its competence or due to other reasons, the investor/shareholder will be informed of this by the Person for contact with investors.
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- After receiving the reply or the requested information from the CEO or from the Board of Directors, the Person for contact with investors forwards it to the investor/shareholder via postal service or by electronic communication.

5 DEADLINES

- 5.1 The Company shall tend to provide an answer to the investor/shareholder within 15 days from the day the Letter/e-mail was duly received, or within the same period notify the investor/shareholder of the additional time the Company may need if more complex investigations or consultations are necessary.
- 5.2. The relevant Directorate/EO should perform the necessary checks and submit the answer to the Chief Executive Officer within 7 days or within 14 days if more complex investigations or consultations are necessary, but in any event within the deadlines agreed with the CEO.

6 PERSONAL DATA PROTECTION

- 6.1 The submitted copy of the identification document will be destroyed immediately after submitting an answer to the investor/shareholder, in accordance with the Law on personal data protection and the internal procedures of the company.

7 CONFIDENTIALITY

- 7.1 The investor/shareholder must treat all information received from the Company as strictly confidential and may not disclose them to any third party without the explicit written consent of the Company. Otherwise, the Company is authorized to request reimbursement of any damages that may be caused to it by the unauthorized disclosure.

8 FINAL PROVISION

- 7.1 This Business Procedure enters into force on the date of its approval by the Board of Directors, and shall become applicable from the date of its publication on the official website of the Company.

Prepared by
Risk Officer

Sofija Misheva Jankovikj



Checked by
Chief Executive Officer

Dimitrios Paschos



Approved by
Board of Directors

Vuk Radovic, Chairman

