



BORUSAN MANNESMANN BORU SANAYİ VE TİCARET A.Ş.
Corporate Governance Information Form
2019 - Annual Notification

Brief Information

2019 Corporate Compliance Report Forms



1. SHAREHOLDERS

Related Companies []

Related Funds []

1. SHAREHOLDERS

1.1. Facilitating the Exercise of Shareholder Rights

The number of investor meetings (conference, seminar, etc.) organized by the company during the year

0

1.2. Right to Information and Examination

The number of special audit request(s)

0

The number of special audit requests that were accepted at the General Shareholders' Meeting

0

1.3. General Assembly

Link to the PDP announcement that demonstrates the information requested by Principle 1.3.1 (a-d).

<https://www.kap.org.tr/tr/Bildirim/745564>

Whether the company provides materials for the General Shareholders' Meeting in English and Turkish at the same time

No

The links to the PDP announcements associated with the transactions that are not approved by the majority of independent directors or by unanimous votes of present board members in the context of Principle 1.3.9

There is no transaction without unanimous votes.

The links to the PDP announcements associated with related party transactions in the context of Article 9 of the Communique on Corporate Governance (II-17.1)

There is no transaction in this regard.

The links to the PDP announcements associated with common and continuous transactions in the context of Article 10 of the Communique on Corporate Governance (II-17.1)

There is no transaction in this regard.

The name of the section on the corporate website that demonstrates the donation policy of the company

<https://www.borusanmannesmann.com/yatirimci-iliskileri/kurumsal-yonetim-bagis-politikasi>

The relevant link to the PDP with minute of the General Shareholders' Meeting where the donation policy has been approved

<https://www.kap.org.tr/tr/Bildirim/750629>

The number of the provisions of the articles of association that discuss the participation of stakeholders to the General Shareholders' Meeting

None

Identified stakeholder groups that participated in the General Shareholders' Meeting, if any

Company Employees

1.4. Voting Rights

Whether the shares of the company have differential voting rights

Yes

In case that there are voting privileges, indicate the owner and percentage of the voting majority of shares.

Group (A) shares have each 5 votes at ordinary and extraordinary meetings. However, provisions of article 479 regulating privilege in voting of Turkish Commercial Code are reserved.

The percentage of ownership of the largest shareholder

73.48%

1.5. Minority Rights

Whether the scope of minority rights enlarged (in terms of content or the ratio) in the articles of the association	No
If yes, specify the relevant provision of the articles of association.	None
1.6. Dividend Right	
The name of the section on the corporate website that describes the dividend distribution policy	Investor Relations / Corporate Governance / Dividend Policy https://www.borusanmannesmann.com/kar-dagitim-politikasi
Minutes of the relevant agenda item in case the board of directors proposed to the general assembly not to distribute dividends, the reason for such proposal and information as to use of the dividend	-
PDP link to the related general shareholder meeting minutes in case the board of directors proposed to the general assembly not to distribute dividends	-

General Assembly Meetings

Date of General Assembly	The number of information requests received by the company regarding the clarification of the agenda of the General Shareholders' Meeting	Shareholder participation rate to the general shareholders' meeting	Percentage of shares directly present at the GSM	Percentage of shares represented by proxy	Specify the name of the page of the corporate website that contains the General Shareholders' Meeting minutes, and also indicates for each resolution the voting levels for or against	Specify the name of the page of the corporate website that contains all questions asked in the general assembly meeting and all responses to them	The number of the relevant item or paragraph of General Shareholders' Meeting minutes in relation to related party transactions	The number of declarations by insiders received by the board of directors	The link to the related PDP general shareholder meeting notification
28/03/2019	0	74.72%	0.00156%	74.71%	https://www.borusanmannesmann.com/genel-kurul-tutanaklari-ve-hazirun	None	Article 10	10	https://www.kap.org.tr/tr/Bildirim/750629

2. PUBLIC DISCLOSURE AND TRANSPARENCY

2. PUBLIC DISCLOSURE AND TRANSPARENCY

2.1. Corporate Website

Specify the name of the sections of the website providing the information requested by the Principle 2.1.1. Under the Investor Relations section

If applicable, specify the name of the sections of the website providing the list of shareholders (ultimate beneficiaries) who directly or indirectly own more than 5% of the shares. <https://www.borusanmannesmann.com/yatirimci-iliskileri/kurumsal-yonetim-ortaklik-yapisi>

List of languages for which the website is available Turkish and Partially English

2.2. Annual Report

The page numbers and/or name of the sections in the Annual Report that demonstrate the information requested by principle 2.2.2.

a) The page numbers and/or name of the sections in the Annual Report that demonstrate the information on the duties of the members of the board of directors and executives conducted out of the company and declarations on independence of board members Corporate Governance / Structure and Formation of the Board of Directors

b) The page numbers or names of the sections that include information about the committees formed within the Board Number, Structure and Independency of Committees established within the Board of Directors

c) The page numbers or names of the sections that include information about the number of board meetings held during the year and the attendance of the members to these meetings Principles of Activity of the Board of Directors

ç) The page numbers or name of the sections that include information about amendments to the legislation which may significantly affect the activities of the corporation None

d) The page numbers or names of the sections that include information about significant lawsuits filed against the corporation and the possible results thereof None

e) The page numbers or names of the sections that include information about the Company's conflicts of interest with the organizations from which it receives services such as investment consultancy and rating services and about the measures taken to prevent such conflicts None

f) The page numbers or names of the sections that include information about the cross ownership subsidiaries that the direct contribution to the capital exceeds 5% It has no mutual participation relationship.

g) The page numbers or names of the sections that include information about social rights and professional training of the employees and corporate social responsibility activities related to company activities leading to social and environmental results Human Resources Policy

3. STAKEHOLDERS

3. STAKEHOLDERS

3.1. Corporation's Policy on Stakeholders

The name of the section on the corporate website that demonstrates the employee remedy or severance policy	None
The number of definitive convictions the company was subject to in relation to breach of employee rights	9
The position of the person responsible for the alert mechanism (i.e. whistleblowing mechanism)	Stakeholders have been made possible to apply to the Ethics committee within Borusan Holding in case the company has unethical transactions that are contrary to the legislation.
The contact detail of the company alert mechanism	The contact detail of the company alert mechanism 0 212 393 52 52 and WhatsApp report line 0 549 8216958

3.2. Supporting Stakeholders' Participation in the Company's Management

Name of the section on the corporate website that demonstrates the internal regulation addressing the participation of employees on management bodies.	None
Corporate bodies where employees are actually represented	None

3.3. The Company's Human Resources Policy

The role of the board on developing and ensuring that the company has a succession plan for the key management positions	The Board of Directors encourages the management to make a succession plan.
The name of the section on the corporate website that demonstrates the human resource policy covering equal opportunities and hiring principles. Also provide a summary of relevant parts of the human resource policy.	https://www.borusanmannesmann.com/borusanli-olmak
Whether the company provides an employee stock ownership programme	There isn't an employee stock ownership programme. The relevant policy can be found in the annual report, under the human resources policy.

The name of the section on the corporate website that demonstrates the human resource policy covering discrimination and mistreatments and the measures to prevent them. Also provide a summary of relevant parts of the human resource policy.

In regard to human resource management, our Company acts in accordance with "Borusan Group Management Understanding and Practices" and "Business Principles, Business Ethics and Human Resource Practices" published by Borusan Holding for all group companies in 2002 and revised in 2012. The first document encompasses the corporate governance understanding, structure, operation, business principles and policies of Borusan Group. The latter document covers Borusan Group's main human resource policies and practices under subheadings such as business principles, application of ethic rules, stakeholder relations, recruitment, work order, remuneration, payments, employee duties and responsibilities. In human resource practices, all group companies have to act in accordance with the following article in the "Borusan Group Management Understanding and Practices" document. "Borusan Group believes in and supports personal rights and liberties everywhere it operates to the fullest extent. Accordingly, under no circumstances and conditions may any discrimination be made in our Group as regards ethnic origin, gender, color, race, nationality, economic status, religion and other belief.

The number of definitive convictions the company is subject to in relation to health and safety measures

2

3.5. Ethical Rules and Social Responsibility

The name of the section on the corporate website that demonstrates the code of ethics

www.borusanmannesmann.com/misyon-vizyon-ve-degerlerimiz

The name of the section on the company website that demonstrates the corporate social responsibility report. If such a report does not exist, provide the information about any measures taken on environmental, social and corporate governance issues.

<https://www.borusanmannesmann.com/misyon-vizyon-ve-degerlerimiz>

"Borusan Group Management Understanding, Business Principles and Practices" prepared by Borusan Holding in 2002 for all group companies and employees covers ethic rules.

Any measures combating any kind of corruption including embezzlement and bribery

This document was revised in 2012 and its name was changed as "Borusan Member Manual: Business Principles, Business Ethics and Human Resources Practices". The document in question has been shared with all employees, and the company's ethic rules have not been announced to the public. The Holding's Internal Audit Department increases the effectiveness of all processes and sub-processes of the company, provides audit and consultancy services by using best practice examples related to the development of processes, audits compliance with corporate governance principles and ethical values, examines the effectiveness of risk management practices and offers improvement suggestions.

4. BOARD OF DIRECTORS - I

4. BOARD OF DIRECTORS - I

4.2. Principles of Activity of the Board of Directors

Date of the last board evaluation conducted	None
Whether the board evaluation was externally facilitated	No
Whether all board members released from their duties at the GSM	Yes
Name(s) of the board member(s) with specific delegated duties and authorities, and descriptions of such duties	Semih Abidin Özmen Chairman of the Board of Directors, Heinrich Clören Vice Chairman of the Board of Directors
Number of reports presented by internal auditors to the audit committee or any relevant committee to the board	-
The name of the section or page number in the annual report that includes an assessment of the effectiveness of internal control system	Risk Management and Internal Control Mechanism
Name of the board chairman	Semih Abidin Özmen
Name of the CEO	Zafer Atabey
If the CEO and Chair functions are combined: provide the link to the relevant PDP announcement providing the rationale for such combined roles	They are not the same person.
Link to the PDP notification stating that any damage that may be caused by the members of the board of directors during the discharge of their duties is insured for an amount exceeding 25% of the company's capital	None
The name of the section on the corporate website that demonstrates current diversity policy targeting women directors	The relevant policy is not available in writing.
The number and ratio of female directors within the Board of Directors	1 14%

Composition of Board of Directors

Name & Surname of Board Member	Whether Executive or Non-Executive	Whether Independent Director or Not	The First Election Date to Board	Link to PDP Notification that includes the Independency Declaration	Whether the Independent Director Considered by the Nomination Committee	Whether She/He is the Director who Ceased to Satisfy Independence Criterion or Not	Whether the Director Has at least 5 Years' Experience on Audit, Accounting and/or Finance or Not
		Not Independent Member					

SEMİH ABİDİN ÖZMEN	Executive (Not independent director)	02/01/2017		Not Considered	No	No
HEINRICH CLÖREN	Non-Executive Independent Director	Not	14/12/2016	Not Considered	No	No
ERKAN MUHARREM KAFADAR	Non-Executive Independent Director	Not	30/03/2016	Not Considered	No	No
DEFNE KOCABIYIK NARTER	Non-Executive Independent Director	Not	28/03/2019	Not Considered	No	No
ALEXANDER ECKHARD SOBOLL	Non-Executive Independent Director	Not	14/12/2016	Not Considered	No	No
NÜSRET CÖMERT	Non-Executive Director	Independent	28/03/2014	https://www.kap.org.tr/tr/Bildirim/745580	Considered	No
MURAT SELEK	Non-Executive Director	Independent	29/03/2018	https://www.kap.org.tr/tr/Bildirim/745580	Considered	No

4. BOARD OF DIRECTORS - II

4. BOARD OF DIRECTORS - II

4.4. Proceedings at the Meetings of the Board of Directors

Number of physical board meetings in the reporting period (meetings in person)	5
Director average attendance rate at board meetings	83%
Whether the board uses an electronic portal to support its work or not	No
Number of minimum days ahead of the board meeting to provide information to directors, as per the board charter	7
The name of the section on the corporate website that demonstrates information about the board charter	None
Number of maximum external commitments for board members as per the policy covering the number of external duties held by directors	There is no such policy.

4.5. Committees Established within the Board of Directors

Page numbers or names of sections in the annual report that includes information about the board committees	Structure and Composition of the Board of Directors
Link(s) to the PDP announcement(s) with the board committee charters	https://www.kap.org.tr/tr/Bildirim/751485

Board of Directors Committees-I

Names of the Board Committees	Name of the Committee Defined as "Other" in the First Column	Names, Surnames of Committee Members	Whether Committee Chair or Not	Whether Board Member Or Not
Audit Committee		Nüsret Cömert	Yes	Board Member
Audit Committee		Ahmet Murat Selek	No	Board Member
Corporate Governance Committee		Nüsret Cömert	Yes	Board Member
Corporate Governance Committee		Erkan Muharrem Kafadar	No	Board Member
Corporate Governance Committee		Alexander Eckhard Soboll	No	Board Member

Corporate Governance Committee	Bora Yüksel	No	Not board member
Committee of Early Detection of Risk	Ahmet Murat Selek	Yes	Board Member
Committee of Early Detection of Risk	Heinrich Clören	No	Board Member
Committee of Early Detection of Risk	Semih Abidin Özmen	No	Board Member

4. BOARD OF DIRECTORS - III

4. BOARD OF DIRECTORS - III

4.5. Committees Established within the Board of Directors - II

Specify where the activities of the audit committee are presented in your annual report or website (Page number or section name in the annual report/website)	Number, Structure and Independence of Committees established within the Board of Directors
Specify where the activities of the corporate governance committee are presented in your annual report or website (Page number or section name in the annual report/website)	Number, Structure and Independence of Committees established within the Board of Directors
Specify where the activities of the nomination committee are presented in your annual report or website (Page number or section name in the annual report/website)	Number, Structure and Independence of Committees established within the Board of Directors
Specify where the activities of the early detection of risk committee are presented in your annual report or website (Page number or section name in the annual report/website)	Number, Structure and Independence of Committees established within the Board of Directors Risk Management and Internal Control Mechanism
Specify where the activities of the remuneration committee are presented in your annual report or website (Page number or section name in the annual report/website)	Number, Structure and Independence of the Committees Formed in the Board of Directors
4.6. Financial Rights Offered to Members of the Board of Directors and Executive Managers	
Page number or section name in the annual report that includes information about the operational and financial targets and whether such targets have been achieved or not	An Evaluation of Operations
Specify the section of website where remuneration policy for executive and non-executive directors are presented.	Financial Benefits
Page number or section name in the annual report that includes information about remuneration and all other benefits provided to board members and senior executives	This information is included in the audit report collectively.

Board of Directors Committees-II

Names of the Board Committees	Name of the Committee Defined as "Other" in the First Column	The Percentage of Non-Executive Directors	The Percentage of Independent Members in the Committee	The Number of Meetings Held by the Committee in Person	The Number of Reports on its Activities Submitted to the Board
-------------------------------	--	---	--	--	--

Audit Committee	100%	100%	4	4
Corporate Governance Committee	75%	25%	4	4
Committee of Early Detection of Risk	67%	33%	4	4



PUBLIC DISCLOSURE PLATFORM

BORUSAN MANNESMANN BORU SANAYİ VE TİCARET A.Ş.

Corporate Governance Compliance Report 2019 - Annual Notification

Brief Information

Corporate Compliance Report 2019





Corporate Governance Compliance Report

Related Companies [] Related Funds []

	Compliance Status					Description
	Yes	Partially	No	Exempted	Not applicable	
Corporate Governance Compliance Report						
1.1. FACILITATING THE EXERCISE OF SHAREHOLDERS' RIGHTS						
1.1.2 - Up-to-date information and disclosures which may affect the exercise of shareholder rights are available to investors at the corporate website.	X					
1.2. RIGHT TO OBTAIN AND REVIEW INFORMATION						
1.2.1 - Management did not enter into any transaction that would complicate the conduct of special audit.	X					
1.3. GENERAL ASSEMBLY						
1.3.2 - The company ensures the clarity of the General Assembly agenda, and that an item on the agenda does not cover multiple topics.	X					
1.3.7 - Insiders with privileged information have informed the board of directors about transactions conducted on their behalf within the scope of the company's activities in order for these transactions to be presented at the General Shareholders' Meeting.					X	The personnel list with privileged access to partnership information has been uploaded to CRA.
1.3.8 - Members of the board of directors who are concerned with specific agenda items, auditors, and other related persons, as well as the officers who are responsible for the preparation of the financial statements were present at the General Shareholders' Meeting.				X		
1.3.10 - The agenda of the General Shareholders' Meeting included a separate item detailing the amounts and beneficiaries of all donations and contributions.				X		
1.3.11 - The General Shareholders' Meeting was held open to the public, including the stakeholders, without having the right to speak.				X		General Assembly meetings were held open to shareholders but not to the public. Minutes of the General Assembly Meeting are submitted for the information of all stakeholders via the Public Disclosure Platform and the company's corporate website.
1.4. VOTING RIGHT						
1.4.1 - There is no restriction preventing shareholders from exercising their shareholder rights.	X					
1.4.2 - The company does not have shares that carry privileged voting rights.						Group (A) shares have each 5 votes at ordinary and extraordinary meetings. However, provisions of article 479 regulating privilege in voting of Turkish Commercial Code are reserved.
1.4.3 - The company withholds from exercising its voting rights at the General Shareholders' Meeting of any company with which it has cross-ownership, in case such cross-ownership provides management control.					X	There is no partnership involving a relationship of mutual participation which brings along a relationship of control.
1.5. MINORITY RIGHTS						
1.5.1 - The company pays maximum diligence to the exercise of minority rights.	X					
1.5.2 - The Articles of Association extend the use of minority rights to those who own less than one twentieth of the outstanding shares, and expand the scope of the minority rights.			X			There is no extension of the scope of minority rights in the articles of association.
1.6. DIVIDEND RIGHT						
1.6.1 - The dividend policy approved by the General Shareholders' Meeting is posted on the company website.	X					
1.6.2 - The dividend distribution policy comprises the minimum information to ensure that the shareholders can have an opinion on the procedure and principles of dividend distributions in the future.	X					

1.6.3 - The reasons for retaining earnings, and their allocations, are stated in the relevant agenda item.		X	Since the profit distribution is made, the relevant issue has been specified as the agenda item.
1.6.4 - The board reviewed whether the dividend policy balances the benefits of the shareholders and those of the company.	X		
1.7. TRANSFER OF SHARES			
1.7.1 - There are no restrictions preventing shares from being transferred.	X		
2.1. CORPORATE WEBSITE			
2.1.1 - The company website includes all elements listed in Corporate Governance Principle number 2.1.1.		X	Frequently asked questions section is not available on the website.
2.1.2 - The shareholding structure (names, privileges, number and ratio of shares, and beneficial owners of more than 5% of the issued share capital) is updated on the website at least every 6 months.	X		Although the rates are up to date, the privilege right in the election of the Board of Directors is not available on our website.
2.1.4 - The company website is prepared in other selected foreign languages, in a way to present exactly the same information with the Turkish content.		X	Although the company has an English website, all information is not available in English.
2.2. ANNUAL REPORT			
2.2.1 - The board of directors ensures that the annual report represents a true and complete view of the company's activities.	X		
2.2.2 - The annual report includes all elements listed in Corporate Governance Principle 2.2.2.	X		
3.1. CORPORATION'S POLICY ON STAKEHOLDERS			
3.1.1 - The rights of the stakeholders are protected pursuant to the relevant regulations, contracts and within the framework of bona fides principles.	X		
3.1.3 - Policies or procedures addressing stakeholders' rights are published on the company's website.		X	Such a procedure is not available on the website.
3.1.4 - A whistleblowing programme is in place for reporting legal and ethical issues.		X	Although this section is not mentioned separately on the website of the company, the issue is addressed in the annual report.
3.1.5 - The company addresses conflicts of interest among stakeholders in a balanced manner.	X		
3.2. SUPPORTING THE PARTICIPATION OF THE STAKEHOLDERS IN THE CORPORATION'S MANAGEMENT			
3.2.1 - The Articles of Association, or the internal regulations (terms of reference/manuals), regulate the participation of employees in management.	X		
3.2.2 - Surveys/other research techniques, consultation, interviews, observation method etc. were conducted to obtain opinions from stakeholders on decisions that significantly affect them.		X	This type of survey / consultation has not been conducted.
3.3. THE COMPANY'S HUMAN RESOURCES POLICY			
3.3.1 - The company has adopted an employment policy ensuring equal opportunities, and a succession plan for all key managerial positions.	X		
3.3.2 - Recruitment criteria are documented.	X		
3.3.3 - The company has a policy on human resources development, and organises trainings for employees.	X		
3.3.4 - Meetings have been organised to inform employees on the financial status of the company, remuneration, career planning, education and health.	X		
3.3.5 - Employees, or their representatives, were notified of decisions impacting them. The opinion of the related trade unions was also taken. The opinion of the related trade unions was also taken in this regard.	X		
3.3.6 - Job descriptions and performance criteria have been prepared for all employees, announced to them and taken into account to determine employee remuneration.	X		
3.3.7 - Measures (procedures, trainings, raising awareness, goals, monitoring, complaint mechanisms) have been taken to prevent discrimination, and to protect employees against any physical, mental, and emotional mistreatment.	X		

3.3.8 - The company ensures freedom of association and supports the right for collective bargaining.	X	
3.3.9 - A safe working environment for employees is maintained.	X	
3.4. RELATIONS WITH CUSTOMERS AND SUPPLIERS		
3.4.1 - The company measured its customer satisfaction, and operated to ensure full customer satisfaction.	X	
3.4.2 - Customers are notified of any delays in handling their requests.	X	
3.4.3 - The company complied with the quality standards with respect to its products and services.	X	
3.4.4 - The company has in place adequate controls to protect the confidentiality of sensitive information and business secrets of its customers and suppliers.	X	
3.5. ETHICAL RULES AND SOCIAL RESPONSIBILITY		
3.5.1 - The board of the corporation has adopted a code of ethics, disclosed on the corporate website.	X	
3.5.2 - The company has been mindful of its social responsibility. It has adopted measures to prevent corruption and bribery.	X	
4.1. ROLE OF THE BOARD OF DIRECTORS		
4.1.1 - The board of directors has ensured strategy and risks do not threaten the long-term interests of the company, and that effective risk management is in place.	X	
4.1.2 - The agenda and minutes of board meetings indicate that the board of directors discussed and approved strategy, ensured resources were adequately allocated, and monitored company and management performance.	X	
4.2. ACTIVITIES OF THE BOARD OF DIRECTORS		
4.2.1 - The board of directors documented its meetings and reported its activities to the shareholders.	X	Matters that are considered to be trade secrets were not shared.
4.2.2 - Duties and authorities of the members of the board of directors are disclosed in the annual report.	X	
4.2.3 - The board has ensured the company has an internal control framework adequate for its activities, size and complexity.	X	
4.2.4 - Information on the functioning and effectiveness of the internal control system is provided in the annual report.	X	
4.2.5 - The roles of the Chairman and Chief Executive Officer are separated and defined.	X	
4.2.7 - The board of directors ensures that the Investor Relations department and the corporate governance committee work effectively. The board works closely with them when communicating and settling disputes with shareholders.	X	
4.2.8 - The company has subscribed to a Directors and Officers liability insurance covering more than 25% of the capital.	X	
4.3. STRUCTURE OF THE BOARD OF DIRECTORS		
4.3.9 - The board of directors has approved the policy on its own composition, setting a minimal target of 25% for female directors. The Board of Directors annually evaluates its composition and nominates directors so as to be compliant with the policy.	X	There is no such policy.
4.3.10 - At least one member of the audit committee has 5 years of experience in audit/accounting and finance.	X	All of the independent audit members have more than 5 years of experience in areas other than audit / accounting and finance.
4.4. PROCEEDINGS AT THE MEETINGS OF THE BOARD OF DIRECTORS		
4.4.1 - Each board member attended the majority of the board meetings in person.	X	
4.4.2 - The board has formally approved a minimum time by which information and documents relevant to the agenda items should be supplied to all board members.	X	
4.4.3 - The opinions of board members that could not attend the meeting, but did submit their opinion in written format, were presented to other members.	X	
4.4.4 - Each member of the board has one vote.	X	
4.4.5 - The board has a charter/written internal rules defining the meeting procedures of the board.	X	
4.4.6 - Board minutes document that all items on the agenda are discussed, and board resolutions include director's dissenting opinions if any.	X	

4.4.7 - There are limits to external commitments of board members. Shareholders are informed of board members' external commitments at the General Shareholders' Meeting.	X	There is no such restriction.
4.5. COMMITTEES ESTABLISHED WITHIN THE BOARD OF DIRECTORS		
4.5.5 - Board members serve in only one of the Board's committees.	X	The board members work in more than one committee. However, members have been selected in accordance with Corporate Governance principles.
4.5.6 - Committees have invited persons to the meetings as deemed necessary to obtain their views.	X	
4.5.7 - If external consultancy services are used, the independence of the provider is stated in the annual report.	X	No external consultancy service has been received.
4.5.8 - Minutes of all committee meetings are kept and reported to board members.	X	
4.6. FINANCIAL RIGHTS OFFERED TO MEMBERS OF THE BOARD OF DIRECTORS AND EXECUTIVE MANAGERS		
4.6.1 - The board of directors has conducted a board performance evaluation to review whether it has discharged all its responsibilities effectively.	X	No such evaluation has been made.
4.6.4 - The company did not extend any loans to its board directors or executives, nor extended their lending period or enhanced the amount of those loans, or improve conditions thereon, and did not extend loans under a personal credit title by third parties or provided guarantees such as surety in favor of them.	X	
4.6.5 - The individual remuneration of board members and executives is disclosed in the annual report.	X	For security and privacy reasons, this information is not disclosed on an individual basis.