

2024

# SUSTAINABILITY REPORT



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# GENERAL INFORMATION

For Waberer's Group<sup>1</sup>, sustainability and responsible corporate governance are of paramount importance. In line with legal requirements, from 2024, the Company prepares its consolidated sustainability report according to the regulations of

the **ESRS (European Sustainability Reporting Standards<sup>2</sup>)**.

The Company's aim is to provide transparent and credible information on its environmental, social, and corporate governance performance, as well as its

progress in sustainability. Incorporating ESG aspects into business reporting and practical operations not only ensures regulatory compliance but also strengthens long-term business stability and competitiveness.

## 1.1 BASIS FOR THE PREPARATION OF THE REPORT

From the 2023 financial year, the Company voluntarily prepares a sustainability report, demonstrating its commitment and ambitions in environmental and social matters.

Due to the changing regulatory environment, from 2024, the Company applies the mandatory EU reporting standards (ESRS), and the sustainability report is published as part of the business report

rather than as a separate document. Previous reports can be found on the Company's website.

### 1.1.1 [BP-1] GENERAL BASIS FOR THE PREPARATION OF SUSTAINABILITY STATEMENTS

Reporting period	2024 financial year (01/01/2024 – 31/12/2024) The reporting period coincides with the period of the consolidated financial statements.
Date of most recent report	In April 2024, the Company's first standardised ("in accordance with" GRI <sup>3</sup> ) sustainability report was issued. This document is the Company's first sustainability report prepared according to the ESRS standards, which will be used as a baseline in the future due to the unified methodology.
Reporting cycle	Annual reporting cycle, according to ESRS standards from 2024.
Content of the Report	Based on the double materiality assessment of Waberer's Group, the material sustainability topics and the related impacts, risks, and opportunities are summarised along the ESRS standards. The purpose of the Report is to provide a true and clear picture of the company group's sustainability performance and its future directions related thereto. Section 134/J of the Accounting Act stipulates that the Group must prepare the consolidated business report in the electronic reporting format (XHTML) defined in Article 3 of the Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation) and must tag it in accordance with the electronic reporting format. Considering that the ESEF taxonomy for sustainability reports has not yet been adopted, the Group was unable to tag the disclosures.

<sup>1</sup> The terms Waberer's Group and Company are to be interpreted as synonyms throughout the Report, referring to the parent company and subsidiaries included in the scope of the report and obliged to report data.

<sup>2</sup> COMMISSION DELEGATED REGULATION (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards

<sup>3</sup> Global Reporting Initiative

Scope of the Report	The Report covers all functional areas and activities of the Company. The Report covers Waberer's International Nyrt. and its subsidiaries at the data level, in line with the scope of the consolidated financial statements (including the related value chains). The acquisition of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. (collectively: Magyar Posta Insurers) was completed on 29 November 2024, thus in terms of the reporting period of the sustainability report, the period from 29 November to 31 December and the related material sustainability topics are considered. For Magyar Posta Insurers, flow-type data points are presented according to values for the incomplete period, and stock-type data points are presented according to year-end values. The relevant narrative disclosures include the strategic directions, policies, and measures pursued by Magyar Posta Insurers in the 2024 financial year.
Changes in the content of the Report	The completed Report is the Company's first sustainability report prepared according to the ESRS framework. It is independent of the previous GRI report, thus the Company will consider it as a baseline in the future due to the unified methodology.
Classification of the Report	The report is prepared based on the Corporate Sustainability Reporting Directive of the European Union in force since 2023 (hereinafter: CSRD) <sup>4</sup> and the related ESRS, as well as Section 134(I)-(K) of Act C of 2000 on Accounting (hereinafter Accounting Act).
Certification of the Report by an external party	The report is certified by a third-party, independent auditor with sustainability accreditation, based on a limited assurance engagement. The assurance opinion is attached as an annex to the consolidated financial statements.

**The term Company refers to Waberer's Group – based on the scope assessment results – encompassing the parent company and its subsidiaries that have ESG data reporting obligations and are fully consolidated in the financial statements:**

#### COMPANIES REGISTERED IN HUNGARY

- Waberer's International Nyrt.
- Waberer's Network Kft.
- Nexways Cargo Kft.
- Delta-Rent Kft.
- All In One Transport Kft.
- Wszl Kft.
- Wszl Automotív Kft.:

- Rapid Teherautó Szerviz Kft.
- Gránit Biztosító Zrt.
- Magyar Posta Biztosító Zrt.
- Magyar Posta Életbiztosító Zrt.
- Wpl-Log Zrt.

#### COMPANIES REGISTERED ABROAD

- Link Sp. Z. O.o:
- Waberer's Slovakia S.r.o
- Waberer's Romania S.r.l.
- Waberer's International Nyrt. Serbian Branch Office (hereinafter presented as a single entity with Waberer's International Nyrt.)

**The term Waberer's transport, freight forwarding, logistics business refers to the parent company and the following subsidiaries, based on the scope assessment results, which operate in the specified business segments and have data reporting obligations:**

#### COMPANIES REGISTERED IN HUNGARY

- WABERER'S INTERNATIONAL NYRT.
- WABERER'S NETWORK KFT.
- NEXWAYS CARGO KFT.

- DELTA-RENT KFT.
- ALL IN ONE TRANSPORT KFT.
- WSZL KFT.
- RAPID TEHERAUTÓ SZERVIZ KFT.

#### COMPANIES REGISTERED ABROAD

- LINK SP. Z. O.O.
- WABERER'S SLOVAKIA S.R.O
- WABERER'S ROMANIA S.R.L.

**The term Waberer's insurance business (insurers) refers to the following subsidiaries, based on the scope assessment results, which operate in the specified business segments and have data reporting obligations:**

- **Gránit Biztosító Zrt.** is presented separately in some cases in the quantitative data collection tables due to its different business activities or disclosure requirements.
- The acquisition of **Magyar Posta Insurers** was completed on 29/11/2024, thus in the reporting period of this sustainability report, in addition to the

relevant narrative information, flow-type data points are presented according to values for the incomplete period, and stock-type data points are presented according to year-end values. If data points are disclosed differently, these are explained separately in the presentation of individual disclosure requirements. The Report

does not cover companies that do not have ongoing, active operations, which are as follows: KDI Property Kft., Közdülő-Invest Kft., WPL Ingatlanfejlesztő Kft., Waberer's Solution Kft., and NEWDEFINE SP. Z.O.O, which was dissolved by liquidation in 2024.

**Beyond own subsidiaries, the double materiality assessment necessary for the preparation of the Report also extended to the Group-level value chain. As the Company prepares its sustainability report on a consolidated basis, its joint ventures and associated companies were considered during the value chain assessment, but they are not obliged to report data for the report due to the lack of decisive operational control in the 2024 financial year. These are as follows:**

#### COMPANIES REGISTERED IN HUNGARY

- Petrolsped Kft.
- Pultrans Kft.

- Psp Terminal Kft.
- Waberer's Rail Kft.

- Dewab Logistics Kft.

#### COMPANIES REGISTERED ABROAD

- Psp Cargo Group S.a. Romania
- Psp Cargo Group S.a. Hungarian Branch Office
- Md International Doo

Waberer's value chain maps were prepared for the three main business segments (Transport and Freight Forwarding, Logistics, Insurance), providing a detailed

overview of the Company's various activities and their associated business relationships. The value chain assessment facilitated the identification of key stakeholders affected or likely to be affected by Waberer's Group's own activities, as well as the upstream (processes at the beginning of the supply chain, such as the procurement of transport equipment, fuel, vehicle parts, and other necessary resources for service provision) and downstream (processes at the end of the supply chain, such as the transportation services pro-

vided by the company, i.e., the forwarding of goods from the clients' warehouses to the final destination) stages of the value chain.

The Company did not exercise the option to omit any specific information corresponding to intellectual property, know-how, or the results of innovation.

No issue arose during the financial year that would justify the need for exemption from disclosing information on imminent developments or matters under negotiation on the Company's side.

## 1.2 [BP-2] DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

During the double materiality assessment, which served as the basis for report preparation, the Company defined the time horizons in accordance with the requirements of the ESRS 1 reporting standard. Impacts, risks, and opportunities were identified according to the following three time horizons:

- **Short-term:** If the positive or negative impact of the given sustainability topic already exists in the current financial year. Impacts identified as actual always fall into this category.
- **Medium-term:** If the given sustainability topic is already relevant in the current financial year, but does not have a significant impact on the environment and/or society yet. The impacts classified here are expected to be felt within 5 years following the reporting period.
- **Long-term:** If the positive or negative impact of the given sustainability topic is expected to occur after 5 years, considering a maximum time horizon of 10 years.

The Company applied value chain estimation for the following performance metrics:

- The Company utilised estimation in the calculation of Scope 3 greenhouse gas emissions. The applicable **[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions** sub-chapter elaborates on the methodology of the estimation applied.

Estimation related to data collection:

- Furthermore, the Company used estimation for the utility data for December, as the exact invoices would not have arrived in time for the prepara-

tion of the report.

The Company did not employ any other generally accepted reporting standards for this sustainability report besides the ESRS.

The list of ESRS data points can be found later in the "ESRS Content Index" table in the **[IRO-2] Disclosure requirements in ESRS covered by the undertaking's sustainability statement** sub-chapter.

The Company exercises the option of phasing-in, the list of sustainability sub-topics for which adequate quality information is not available for disclosure in the first reporting period can be found in the "ESRS Content Index" table in the **[IRO-2] Disclosure requirements in ESRS covered by the undertaking's sustainability statement** sub-chapter. The Company ensures the availability of this information to the best of its ability for the next reporting period.

## 1.3 GOVERNANCE

The main governing bodies of the Company are the General Meeting, the Board of Directors, the Supervisory Board, the Audit Committee and the Nomination and Remuneration Committee.

Waberer's Group has strict expectations for its directors, officers, and employees to comply with applicable Hungarian and international laws, as well as the obligations undertaken in the contracts signed and in force by the Group, and to adhere to the highest standards of business eth-

ics. The Group's executive body is the Board of Directors, which is responsible for coordinating the Group's various affairs, representing Waberer's in dealings with third parties and before a court or other authority. Acting for and on behalf of Waberer's, the Board of Directors may ac-

quire rights, assume liabilities, and determine the Group's business activities. The members of the Board are obliged to carry out their activities with due diligence that can generally be expected of the holders of such office, prioritising the interests of the Company. Their roles, responsibilities, and the way they are selected are described below. Up-to-date information on these bodies is available on the Group's [website](#).

### 1.3.1 [GOV-1] THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The functional role of the General Meeting, the Board of Directors and its members, the Supervisory Board and its members, the Audit Committee and its members, and the Nomination and Remuneration Committee and its members is presented in the business report.

#### GENERAL MEETING

The supreme body of the Company, at which shareholders may exercise their rights in person or by proxy. The General Meeting shall have quorum if it has been duly convened and if it is attended by shareholders representing over 40 percent of the votes embodied by voting shares. Each share with a nominal value of EUR 0.35 carries one vote. A shareholder can only vote one way. Shareholders holding at least one percent of the voting rights in the Company are entitled to exercise minority rights.

#### BOARD OF DIRECTORS AND ITS MEMBERS

The Group's executive body is the Board of Directors, which is responsible for coordinating the Group's various affairs, representing Waberer's in dealings with third parties and before a court or other authority. The Board of Directors is made up of at least 3 and not more than 7 members. The members of the Board of Directors are elected by the General Meeting for a term of three years. With the exception of the acquisition of shares in a public limited

company, a member of the Board of Directors may not acquire any shareholding or hold any executive position in any other entity engaged in the same activities as the Group, unless approved in advance by the General Meeting, within the limits allowed by the Articles of Association, in the case of core activity, or the Board of Directors, in other cases.

#### SUPERVISORY BOARD AND ITS MEMBERS

The members of the Supervisory Board are elected by the General Meeting for a term of three years. The majority of the members must be independent persons. One third of the Supervisory Board is made up of employee delegates. The employee delegates are appointed by the Works Council from among the employees, taking into account the opinion of the trade unions operating at the Group. No employee of the Group may be a member of the Supervisory Board other than on the basis of the employee participation rules.

#### AUDIT COMMITTEE AND ITS MEMBERS

From the independent members of the Supervisory Board, the General Meeting elects an Audit Committee of at least three members for a term of office equal to the term of each member's membership in the Supervisory Board. The Audit Committee oversees the effectiveness of risk management and the operation of the internal control system.

#### NOMINATION AND REMUNERATION COMMITTEE AND ITS MEMBERS

The Nomination and Remuneration Committee is an advisory body to the Board of Directors of the Company, which assists the Group Board of Directors with its recommendations on the appointment of key employees of the Company and the formulation of the Remuneration Policy. Its members are appointed by the Board of Directors from among the independent members of the Board of Directors and the Supervisory Board.

NUMBER OF EXECUTIVE AND NON-EXECUTIVE BOARD MEMBERS	
NUMBER OF EXECUTIVE MEMBERS:	
Male: 5	Female 0
100%	0%
NUMBER OF NON-EXECUTIVE (SUPERVISORY BOARD) MEMBERS:	
Male: 5	Female 1
83.3%	16.7%
NUMBER OF INDEPENDENT MEMBERS OF THE MANAGEMENT BODY (ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES): 4	
PROPORTION OF INDEPENDENT MEMBERS OF THE MANAGEMENT BODY (ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES): 36.4%	

### MANAGEMENT BODY

The Company's executive body is the Board of Directors, which consists of both internal and external members. According to the ESRS, an independent member of the management body is a member that exercises independent judgment free from any external influence or conflicts of interest. Independence generally means the exercise of objective, unfettered judgment. According to the ESRS, "when used as the measure by which to judge the appearance of independence, or to categorise a non-executive member of the administrative, management and supervisory bodies or their committees as independent, it means the absence of an interest, position, association or relationship which, when judged from the perspective of a reasonable and informed third party, is likely to influence unduly or cause bias in decision-making."

### SUPERVISORY BODIES

In the Company's corporate governance, non-executive members are those who

hold a mandate in the Supervisory Board. The Company's Supervisory Board consists of six members, comprising two employee delegates and four independent members. The proportion of independent Supervisory Board members is 66.7%.

### ADMINISTRATIVE BODY

In 2024, the following persons belonged to the top operational management of the Company and the Group:

- Zsolt Barna
- Barna Erdélyi
- Szabolcs Gábor Tóth

The Company's management has extensive experience in transportation, freight forwarding and logistics, as well as corporate governance, management and economics. The professional curriculum vitae of management members employed by the Company is available on the [website](#) of the Company. 100% of the administrative body is male. Further information can be found in the Company's consolidated financial statements.

The Board of Directors of Magyar Posta Insurers consists of four members in ac-

cordance with the provisions of the Articles of Association, with the Chief Executive Officer also being a member of the Board of Directors. The Board of Directors exercises employer rights – except for appointment (election) and dismissal (recall), as well as remuneration – over the Company's management members (chief executive officer and deputy chief executive officers). The members of the Board of Directors are elected by the General Meeting, two of whom are nominated by Gránit Biztosító Zrt. belonging to Waberer's Group. The Supervisory Board of Magyar Posta Insurers currently consists of three members in accordance with the provisions of the Articles of Association, one of whom is also elected by the General Meeting. The Audit Committee of Magyar Posta Insurers consists of three members, also elected by the General Meeting, from among the members of the Company's Supervisory Board and Board of Directors, including nominees delegated by Gránit Biztosító Zrt. belonging to Waberer's Group.

## 1.3.2 [GOV-1] ESG GOVERNANCE, THE ROLE AND MEMBERS OF THE ESG COMMITTEE

The ESG Committee functions as an advisory body, while the approval of the ESG Strategy, the Sustainability Report, and the associated budget and task plan falls within the competence of the Board of Directors.

The Committee is responsible for overseeing the Company's ESG Strategy and related actions, as well as monitoring changes in the international and domestic regulatory environment. Its tasks include

identifying and managing sustainability risks, as well as monitoring procedures. Additionally, it actively participates in the preparation of sustainability reports and disclosures, ensuring their compliance

with legal requirements. The Committee discusses and reviews practices submitted by the ESG Director, regularly evaluates the Company's ESG performance, and formulates development proposals. The members of the ESG Committee are appointed by the Board of Directors from among the members of the Board of Directors and the Audit Committee. The members' mandate aligns with their term, thus it automatically expires with the ter-

mination of their membership in the body. Members may be re-elected and recalled at any time. The Chair of the ESG Committee is the Chief Financial and Strategic Officer of the Company. The permanent guests include the Company's current ESG Director and ESG Expert. The ESG Working Group operates under

the ESG Committee and is responsible for the practical implementation of strategic plans, under the coordination of the ESG Directorate. Its members are the functional directors of the Group or persons delegated by them. The ESG Committee plays an active role in reviewing and approving the Company's

ESG policy and integrating it into the Company's overall strategy. The ESG Working Group is responsible for implementation tasks, preparing ESG practices, objectives, procedures, performances within the Group, and defining the Group's ESG targets.

ESG COMMITTEE	ESG WORKING GROUP
<p><b>Function:</b></p> <ul style="list-style-type: none"> <li>Supervision of ESG Strategy approval</li> <li>Supervision of Waberer's Group ESG practices</li> <li>Monitoring compliance with changes in the international and domestic regulatory environment</li> <li>Supervision of sustainability reporting</li> <li>Supervisory role in risk management: assessment, control, and monitoring of sustainability risks</li> </ul>	<p><b>Function:</b></p> <ul style="list-style-type: none"> <li>Designing of ESG Strategy</li> <li>Implementation of ESG Strategy</li> <li>Preparation of Waberer's Group's ESG exercises</li> <li>Development of ESG policy, planning its integration into business strategy</li> <li>Preparation of sustainability reporting</li> <li>Risk management: assessment, control, and monitoring of sustainability risks</li> </ul>
<p><b>Form of communication:</b></p> <ul style="list-style-type: none"> <li>Quarterly committee meetings</li> <li>consultation with the ESG working group</li> </ul>	<p><b>Form of communication:</b></p> <ul style="list-style-type: none"> <li>Internal consultation every two months</li> <li>Quarterly presentation of results to the ESG Committee</li> </ul>
<p><b>Members:</b></p> <ul style="list-style-type: none"> <li>Chair: Chief Financial and Strategic Officer</li> <li>Member(s) of the Board of Directors</li> <li>Member of the Audit Committee</li> </ul> <p><b>Permanent guests:</b></p> <ul style="list-style-type: none"> <li>ESG Director</li> <li>ESG Expert(s)</li> </ul>	<p><b>Members:</b></p> <ul style="list-style-type: none"> <li>Director of Capital Markets</li> <li>Controlling Director</li> <li>Procurement Director</li> <li>Senior Legal Counsel</li> <li>Group Head of Quality</li> <li>Marketing Manager</li> <li>HR Director</li> <li>Group Internal Audit Manager</li> <li>Insurance ESG responsables</li> <li>Group ESG responsables</li> <li>SSC Director</li> <li>Technical Director</li> <li>Company Group Division Managers</li> </ul>

In September 2021, the Company established the Green Division as a separate organisational unit, now known as the ESG Directorate, which is responsible for setting sustainability plans and targets, as well as coordinating the implementation of the Group's ESG strategy and the preparation of ESG-related reports and risk assessments.

The department reports to the Group's Chief Financial and Strategic Officer, and is headed by the ESG Director, who consults with the Deputy CEO on a weekly basis and with the CEO on a monthly basis on current sustainability issues. The ESG Director also reports monthly to middle and senior management on sustainability issues affecting the Group, and prepares reports and presentations for discussion at Board or ESG Committee meetings. The ESG Directorate, with its team of ESG experts, supports the Company's stra-

tegic objectives. The organisational unit synthesises the three dimensions of sustainability and the operational challenges related to the Company's day-to-day operations, thereby supporting the viability of the Company's business strategy. The ESG Directorate is not part of the executive bodies, however, its head, the Group's ESG Director, is a permanent guest at the established ESG Committee, which is responsible for monitoring sustainability-related risks and integrating group-level ESG aspects into the business strategy.

The ESG Directorate operates as a knowledge centre on sustainability for the entire Company, involving external experts if necessary. This knowledge enables the Company to comprehensively identify its material impacts, as well as map out risks and opportunities according to the ESG framework.

## SUMMARY OF ESG-RELATED RESPONSIBILITIES

SUPERVISORY BOARD	Control
AUDIT COMMITTEE	Audit support
BOARD OF DIRECTORS	Final approval and creation of strategic alignment
ESG COMMITTEE	Approval and control of milestones
ESG WORKING GROUP	Operational work organisation
ESG TEAM – ESG Directorate	Project management and knowledge centre
ESG DATA STEWARDS	Data reporting

### 1.3.3 [GOV-2] INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

At the quarterly meetings of the ESG Committee, the ESG Working Group – through the ESG Director – provides the management with updates on the development of material impacts, risks, and opportunities, the progress of achieving the set sustainability targets, and the currently emerging sustainability issues.

The ESG Working Group, established at the end of 2024, consists of the heads of the areas affected by the sustainability topics. The ESG Policy establishing the ESG Working Group has been approved by the ESG Committee, to be followed by the issuance of a formalised, group-level CEO Order after the submission of this Report. The responsibilities of the ESG Working Group include, among others, the preparation of ESG practices, targets, procedures, and performances

within the Group, monitoring changes in the international and domestic regulatory environment, active participation in the preparation of the sustainability report, and the development of the Group's ESG policy and its integration into the business strategy. The Working Group plays a role in assessing, controlling, and supervising monitoring procedures for sustainability risks, and in reviewing the ESG strategy. The joint work of these bodies ensures the measurement and evaluation of the per-

formance of ESG-related measures.

During the reporting period, members of the ESG Committee were informed about the impacts, risks, and opportunities identified based on the results of the double materiality assessment. The ESG Committee accepted the identified material topics, impacts, risks, and opportunities. Chapter **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)** details the material topics and their related impacts, risks, and opportunities.

In the Board of Directors of Magyar Posta Insurers, a separate board member has been designated as the person responsible for sustainability.

### 1.3.4 [GOV-3] INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

Currently, the Company does not have incentive mechanisms related to sustainability issues for the administrative or supervisory bodies.

The currently applied incentive schemes are detailed in the Group's remuneration

report. Further information can be found in the Remuneration Report of Waber-

er's International Nyrt., which is available among the **Corporate Governance core documents**.

### 1.3.5 [GOV-4] STATEMENT ON DUE DILIGENCE

The following table summarises the fundamental elements of the Company's due diligence, also applied in this Report, which relate to impacts on people and/or the environment, and how these appear in relevant policies, board responsibilities, and measures.

The Company also has due diligence processes in place that consider envi-

ronmental aspects (according to the ISO 9001 quality management standard, the integrated ISO 14001 environmental management, ISO 50001 energy management, and ISO 28000 security management standards).

FUNDAMENTAL ELEMENTS OF DUE DILIGENCE	PARAGRAPHS OF THE SUSTAINABILITY STATEMENT	RELEVANT POLICIES, BODIES, ACTIONS
a) embedding due diligence in governance, strategy and business model	GOV-1, GOV-2, GOV-3 G1	Code of Ethics ESG Strategy integrated into the business strategy Rules of Procedure of the ESG Committee Procurement Policy
b) engaging with affected stakeholders in all key steps of the due diligence	SBM-2 S1, S2, S4	Negotiations with trade unions Informing employees and trade union representatives, internal communication Employee satisfaction survey Customer satisfaction measurement Operation of the ESG governance organisation
c) identifying and assessing adverse impacts	IRO-1	Double materiality assessment ESG strategy
d) taking actions to address those adverse impacts	GOV-2, GOV-5	ESG Committee ESG Working Group
e) tracking the effectiveness of these efforts and communicating	MDR-T, GOV-2, GOV-5	Review of ESG Strategy by the ESG Working Group Informing on progress at ESG Committee meetings, necessary reporting (under development) Informing employees through forums, circulars

### 1.3.6 [GOV-5] RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

The compliant operation of the Company is ensured by the internal control system. Within the internal control mechanism, all managers and executives must assess the risks in their area of management, and mitigate them by issuing internal policies, and monitoring compliance.

The Internal Audit Department may monitor the effectiveness of the internal control mechanism in the framework of its annual audit programme and ad hoc audits, and reports quarterly to the Supervisory Board on its findings and corrective measures. The organisational unit dealing with the Company's sustainability issues is the ESG Directorate and Working Group, which, with the area's experts, defines the

Group's sustainability plans and targets, while the ESG Committee plays an active role in assessing and managing sustainability risks and tracks the monitoring procedures. The internal control process extends to the organisational governance of sustainability.

During the first sustainability reporting and subsequently, within the ESG Directorate coordinating reporting, the ESG

experts responsible for reporting and the ESG Working Group evaluate and review the risks arising from expected changes for the next period with the external advisor assisting the reporting. This assessment also covers the technical, administrative, and content-related conditions of report preparation. Factors causing difficulty and risk are identified, and concurrently the steps for development are also designated. The prioritisation and deeper examination of risks have not yet been carried out; the Company plans to do this next year.

The main risks arising during the reporting process, due to the novelty of the process, relate to the accuracy and com-

pleteness of data collection, which in certain cases may result in the report distorting the Company's ESG performance. The most important emerging risks include potential erroneous data collection due to unpractised control processes, missing data points or differing data calculation methodologies at subsidiaries, and the inaccuracy of estimates in the case of missing data points. During the risk assessment, the probability of occurrence of the above risks, the magnitude of their impact on reporting, and the existence of preventive measures were considered. The Company's aim is to mitigate and avoid these risks, striving for the accuracy and transparency of the data production methodology.

During report preparation, the Company applied the following main preventive and risk-mitigating measures:

- To ensure regulatory compliance, an external advisor was engaged to support the internal reporting team and experts.
- Expert consultations and internal workshops were held on the interpretation of ESRS data points to ensure that data responsible persons have the appropriate information during narrative data collection to meet the ESRS disclosure requirements.
- For narrative data points, internal policies, strategic approaches, and additional documents were reviewed and extracted.
- During the collection of quantitative data points, the four-eyes principle was applied, with validation through managerial approvals.
- During data collection, efforts were made to achieve completeness, addressing all relevant subsidiaries and collecting data from them.
- Continuous support was provided by the ESG Directorate's experts responsible for ESG reporting towards the data responsible persons.
- The responsibilities of internal data responsible persons and approvers were designated during the validation of the sustainability report according to the relevant subject areas, and this plan was adhered to during the approval processes.
- Approval of the sustainability report by the ESG Committee, followed by the Board of Directors' approval as final validation.
- Furthermore, considering the first year of sustainability reporting based on ESRS standards, the Company will publish in the report on the 2025 financial year how the control processes and risk assessment steps related to the report are systematically integrated into the Company's internal procedures, based on practical experiences.
- The ESG Directorate reports to the Company's Chief Financial and Strategic Officer, and is headed by the ESG Director, who consults with the Deputy CEO on a weekly basis and with the CEO on a monthly basis on current sustainability issues. At its meetings, the ESG Committee monitors the progress made in sustainability topics on a quarterly basis and evaluates the targets based on the operational work of the ESG Working Group.

## 1.4 STRATEGY

**In recent years, new market demands for sustainability and green services have emerged across Europe, with demand continuously increasing.** This trend offers a significant opportunity for the Company to gain a competitive advantage in the market. Simultaneously, employee expectations have also changed: the bal-

ance between work and private life is receiving increasing emphasis.

Attracting and retaining workforce is crucial for the Company, making it essential to adapt to market changes to maintain and strengthen its market position. Waberer's Group's business strategy and ESG strategy aim to address these challenges, en-

suring sustainable growth and long-term competitiveness.



## 1.4.1 [SBM-1] STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### THE COMPANY'S BUSINESS ACTIVITIES

The Company's activities are conducted in three main areas of operation:

#### International Transport Segment (ITS):

One of Europe's leading FTL (Full-Truck Load) transport service providers, with own fleet and subcontractor operations and intermodal services (combination of rail and road transport). The segment focuses on Europe's main industrial centres (UK, Germany, France, Italy, Spain, Poland, Hungary, Slovakia).

#### Regional Contract Logistics segment

Market-leading complex logistics service provider in Hungary, with an integrated

service portfolio tailored to industry needs and customers (e.g. distribution, warehousing, home delivery, production support logistics, container transport, fresh goods logistics).

**Insurance segment:** Insurance business previously focused exclusively on non-life insurance products, with a focus on Hungary. Specialist in passenger and commercial vehicle insurance, MTPL, CASCO, CMR insurance. With Magyar Posta Biztosító, the segment represents a significant market share in the home and travel insurance market, and with Magyar Posta Életbiztosító, the segment will extend to life insurance from the end of 2024.

### Business strategy

The Group's business strategy has been defined until 2027. Further information can be found in the Company's consolidated financial statements. The Group aims to become the number one complex logistics service provider in the Central and Eastern European region, with a comprehensive, customer-focused and sustainable service portfolio. The group-wide strategy of Waberer's is based on a unique combination of services for customers, with key elements such as cost efficiency, high quality service for key customers, and a portfolio of services with higher added value within the service portfolio.

### PILLARS OF THE STRATEGY

	INFRASTRUCTURE AND TECHNOLOGY DEVELOPMENT	INCREASING ADDED-VALUE	DIVERSIFICATION
Contract logistics	Increasing warehouse capacity (national coverage) in an energy-efficient manner	In-house logistics growth	Regional expansion (acquisition of MDI)
	Expanding the alternative power-train fleet	Establishing fulfilment logistics capability	Entering new specialised logistics service segments
Home delivery growth			
Transport and freight forwarding	Fleet modernisation for more efficient operations	Increasing the share of revenue from specialised FTL services	Increasing the share of multimodal services (Petrolsped acquisition)
Insurance	Digitalisation of back-office activities for claims settlement and customer service	Delivering full digital customer experience	Expansion of the product portfolio
	Expansion and digitalisation of sales channels		Exploring the possibility of entering regional markets

The fourth pillar of the business strategy is sustainability. In order to define further steps on sustainability, the Board of Directors of the Company adopted a Group-wide ESG strategy in the first quarter of 2024, whose main focus areas are the development of green services, reduction of emissions, creation of an attractive work-

place, ensuring regulatory and internal compliance, and increasing adaptability. The table below presents the Company's sustainability focus areas in connection with the strategic targets. The ESG Strategy will be reviewed in 2025 based on the results of the double materiality assessment carried out during the first ESRS re-

port. The ESG Strategy currently does not include the LINK Sp.z.o.o. subsidiary and Magyar Posta Insurers. In 2025, during the revision of the ESG Strategy, these companies will also be integrated.

## ESG STRATEGY

SUSTAINABILITY FOCUS AREAS					
Sustainability focus areas	Development of green services	Reduction of emissions	Creating an attractive and progressive workplace	Ensuring legal and internal compliance	Increasing adaptability
Strategic goals	Increasing the share of rail and intermodal transport	Formulation and publication of emission reduction targets	Training and developing employees, increasing engagement	Ensuring compliance with regulatory requirements	Strengthening stakeholder relations
	Increasing the use of alternative powertrains	Increasing green infrastructure investment projects (Gránit Biztosító Zrt.)	Improving working conditions (pay, working hours, health and safety, comfort, environment)	Corporate governance principles recommended for public companies	Increasing transparency and accountability
	Increasing the use of alternative fuels	Reducing fuel use	Harnessing the potential of diversity	Compliance with internal organisational standards	Exploiting green financing opportunities
	Developing sustainable storage technology	Increasing energy and cost efficiency measures		Establishing ESG governance at group level	
	Greening the insurance segment's investment portfolio, introducing environmental product incentives (Gránit Biztosító Zrt.)				
Related UN Sustainable Development Goals (SDGs)	3. Good health and well-being 5. Gender equality 8. DECENT WORK AND ECONOMIC GROWTH 9. Industry, innovation and infrastructure 10. Reduced inequalities 12. Responsible consumption and production 13. Climate action 17. Partnership towards accomplishing goals				

In international freight forwarding, the Company has to date focused on road transport and, to a lesser extent, intermodal transport, which can be considered a combination of road and rail transport. There is a growing expectation from both regulators and customers to significantly reduce the environmental footprint of long-distance transport, which can be supported by carrying out transport tasks by rail. Recognising this, in 2023 the Company signed a sale and purchase contract to acquire a majority stake in PSP (Petrolsped) Group, a company with significant infrastructure and experience in rail logistics, successfully closing the transaction in early 2024. PSP Group is planned to be the foundation for the future transformation of services to rail, and through this acquisition the Company will be able to enter the market for the transport of bulk goods that are already predominantly transport-

ed by rail (such as construction materials, grain). The total workforce headcount of the Company: 6,569

The Company's workforce by geographical region: the total workforce belongs to one geographical region, and all of the Company's sites operate in Europe.

Social information is detailed in the chapter **[S1-6] Characteristics of the undertaking's employees**, providing information related to employees.

The Company does not provide services that are subject to prohibitions in certain markets.

More information on the Company's turnover and its distribution by business segment can be found in the Company's consolidated financial statements. The Company does not engage in activities related to the exploration, storage, or transportation of fossil fuels, does not participate in the trade of controversial

weapons, and does not engage in activities related to tobacco cultivation.

The value chain assessment includes all reasonable and supportable information available to the Company during the reporting period. The mapping of the value chain was carried out along the Company's three main business segments. The following summary presents the most relevant value chain activities from the perspective of the Company's business operations, with examples.

Value chain of international transport and freight forwarding:

The international transport and freight forwarding segment includes the activities of subsidiaries providing road and rail transport and freight forwarding services, which are as follows: Waberer's International Nyrt., Waberer's Network Kft., Nexways Cargo Kft., Delta-Rent Kft., All In One Transport Kft., Waberer's Romania S.R.L.,

LINK SP. Z.O.O., Waberer's Slovakia S.R.O.

At the beginning of the value chain is vehicle manufacturing, which the Company may indirectly influence through its

orders. However, the company leases 90% of its vehicle fleet, meaning that these are not directly owned by the Company. After the lease period expires, the further fate

of the returned vehicles falls outside the Company's scope.

ACTIVITY	AFFECTED SECTION OF THE VALUE CHAIN	AFFECTED COUNTRIES (ESTIMATED LOCATION)	LIST OF STAKEHOLDERS
Vehicle manufacturing Following negotiations with the supplier, production of the required vehicles by the supplier	Upstream	<ul style="list-style-type: none"> <li>Europe</li> </ul>	Suppliers, vehicle manufacturers
Leasing and procurement Procurement and leasing of necessary assets (e.g.: vehicles, fuel, parts, IT equipment, fuel card, etc.)	Direct (own activity), upstream	<ul style="list-style-type: none"> <li>Europe</li> </ul>	Leasing companies, suppliers, banks, vehicle manufacturers
Sales Identifying, approaching, and attracting potential customers Developing pricing strategies Customer relationship management	Direct (own activity)	<ul style="list-style-type: none"> <li>Poland</li> <li>Romania</li> <li>Slovakia</li> <li>Serbia</li> <li>Hungary</li> </ul>	Customers, employees of Waberer's Group
Planning Receiving and processing customer orders. Selecting delivery routes and solutions in compliance with transport regulations. Involving subcontractors if necessary	Direct (own activity), upstream, downstream	<ul style="list-style-type: none"> <li>Poland</li> <li>Romania</li> <li>Slovakia</li> <li>Hungary</li> </ul>	Customers, employees of Waberer's Group, regulatory authorities, subcontractors
Transport Loading goods onto vehicles and transportation Real-time tracking and monitoring Managing transit, including breaks and refuelling Ensuring the safety and security of the cargo	Direct (own activity), upstream, downstream	<ul style="list-style-type: none"> <li>For example:</li> <li>Germany</li> <li>France</li> <li>Great Britain</li> <li>Spain</li> <li>Italy</li> <li>Austria</li> <li>Slovakia</li> <li>Hungary</li> </ul>	Customers, employees of Waberer's Group, regulatory authorities, subcontractors, local community
Delivery and unloading Unloading goods at the destination Receiving delivery confirmation and signatures	Direct (own activity), upstream, downstream	<ul style="list-style-type: none"> <li>For example:</li> <li>Germany</li> <li>France</li> <li>Great Britain</li> <li>Spain</li> <li>Italy</li> <li>Austria</li> <li>Slovakia</li> <li>Hungary</li> </ul>	Customers, employees of Waberer's Group, regulatory authorities, subcontractors
Administration Preparing transport-related administration, internal freight accounting and for invoicing purposes	Direct (own activity), upstream, downstream	<ul style="list-style-type: none"> <li>Poland</li> <li>Romania</li> <li>Slovakia</li> <li>Hungary</li> </ul>	Customers, employees of Waberer's Group, regulatory authorities, subcontractors
Service and maintenance, site operation Regular maintenance and servicing of trucks, site management	Direct (own activity)	<ul style="list-style-type: none"> <li>Poland</li> <li>Hungary</li> </ul>	Employees of Waberer's Group, regulatory authorities, local communities

**VALUE CHAIN OF THE LOGISTICS  
BUSINESS SEGMENT:**

The subsidiaries belonging to the regional contract logistics segment are as follows: Waberer's International Nyrt., WSZL Kft.,

WSZL Automotív Kft., Rapid Teherautó Szerviz Kft., Waberer's Slovakia S.R.O.

ACTIVITY	AFFECTED SECTION OF THE VALUE CHAIN	AFFECTED COUNTRIES (ESTIMATED LOCATION)	LIST OF STAKEHOLDERS
Vehicle manufacturing Following negotiations with the supplier, production of the required vehicles by the supplier	Upstream	<ul style="list-style-type: none"> <li>Europe</li> </ul>	Suppliers, vehicle manufacturers
Procurement, real estate development Procurement and leasing of necessary assets (e.g.: renting and developing warehouse spaces, forklifts, loading equipment, IT equipment, etc.) Involving appropriate subcontractors if necessary (e.g.: cleaning, security)	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest)</li> <li>Slovakia</li> </ul>	Leasing companies, lessors, suppliers, contractors, subcontractors, vehicle manufacturers
Sales Market research and analysis. Identifying, approaching, and attracting potential customers Developing pricing strategies Customer relationship management	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, employees of Waberer's Group
Handling incoming goods Registering, receiving, unloading, and inspecting incoming shipments. Warehousing, inventory control, and inventory management.	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, customers' employees, employees of Waberer's Group, regulatory authorities, subcontractors, local communities
Value-added services Optionally available services: labelling, co-packing, parts logistics, webshop servicing, etc., bonded warehouse	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, customers' employees, employees of Waberer's Group, regulatory authorities, subcontractors, local communities
Handling outgoing goods Organising, selecting, packaging, loading, and dispatching outgoing goods to customer addresses or other warehouses	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, customers' employees, employees of Waberer's Group, regulatory authorities, subcontractors, local communities
Delivery Transporting goods with own vehicles or by subcontractors	Direct (own activity), upstream, downstream	<ul style="list-style-type: none"> <li>Hungary</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, employees of Waberer's Group, transport subcontractor
Administration Preparation of administration related to activities, internal freight accounting and for invoicing purposes	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, employees of Waberer's Group, regulatory authorities, subcontractors, local communities
Warehouse operation Site management, quality assurance, obtaining necessary permits, conducting audits	Direct (own activity)	<ul style="list-style-type: none"> <li>Hungary (Budapest, Páty, Győr, Miskolc)</li> <li>Slovakia</li> <li>Serbia</li> </ul>	Customers, employees of Waberer's Group, regulatory authority, local community

**VALUE CHAIN OF THE INSURANCE SEGMENT:**

The companies belonging to the Company's insurance segment are as follows:

Gránit Biztosító Zrt., Magyar Posta Biztosító Zrt., Magyar Posta Életbiztosító Zrt.

ACTIVITY	AFFECTED SECTION OF THE VALUE CHAIN	COUNTRIES CONCERNED (ESTIMATED LOCATION)	LIST OF STAKEHOLDERS
Procurement Procurement of necessary assets (e.g.: IT equipment, etc.) Involving appropriate subcontractors if necessary (e.g.: cleaning, security)	Direct (own activity)	• Hungary	Leasing companies, suppliers
Product and service development Designing, developing, and launching products and services based on customer and market needs Applying marketing tools if necessary	Direct (own activity)	• Hungary	Customers (retail and corporate), employees of the Insurers, regulatory authorities, insurance intermediary partners
Distribution and sales Understanding and strategically approaching the target market to provide products and services and generate revenue (Compulsory insurance, CASCO insurance, home insurance, travel insurance, property insurance, etc.)	Direct (own activity)	• Hungary	Board of Directors, strategic partners
Activities / analysis Analysis of risk profiles and pricing models for the conclusion and issuance of insurance policies. Performing necessary administrative activities (e.g.: invoicing, queries, modifications).	Direct (own activity)	• Hungary	Customers (retail and corporate), employees of the Insurers, regulatory authorities
Claims reporting Claims reporting, handling related customer service tasks.	Direct (own activity), upstream, downstream	• Depends on the location of the incident	Customers (retail and corporate), employees of the Insurers, regulatory authorities
Claims management Assessment and determination of claims, including the recovery of payments from reinsurance and litigation if applicable.	Direct (own activity)	• Hungary	Customers (retail and corporate), employees of the Insurers, regulatory authorities, external partners (loss adjuster offices)
Asset and investment management Utilisation and investment of assets derived from policyholders' surplus and reserves to generate revenue and ensure solvency to cover liabilities.	Direct (own activity)	• Hungary	Customers (retail and corporate), employees of the Insurers, regulatory authorities, investment fund managers

## 1.4.2 [SBM-2] INTERESTS AND VIEWS OF STAKEHOLDERS

The Company's stakeholders have been classified into two categories based on importance, interest, and influence assessment. Primary stakeholders are individuals or groups directly involved in the Company's economic activities. Primary stakeholders are as follows: ESG Committee, ESG expert team, heads and representatives of operational areas related to ESG at Group-level, heads and operational management of subsidiaries, own employees, industry organisations and

trade unions, suppliers, subcontractors, customers (international and domestic), investors, shareholders, financiers (banks). Secondary stakeholders are actors who do not directly participate in the Company's economic activities but may influence its operations. Secondary stakeholders are: regulatory authorities, local communities, civil organisations, competitors, media, educational institutions, and nature as a silent stakeholder. During the Company's double materiality assessment

(hereinafter: DMA), based on the results of stakeholder identification, primary internal and external stakeholders were directly involved in the DMA process concerning material sustainability topics.

Primary stakeholder groups relevant to the Company's activities, the form of cooperation with them, and the topics involved:

STAKEHOLDER GROUP	FORM OF COOPERATION	TOPICS
ESG Committee	Committee meetings	Sustainability business policy
Heads and representatives of operational areas related to ESG at Group-level	Workshops Interviews ESG Working Group meetings	Operational issues related to sustainability topics
Subsidiary leaders / operational management	Workshops Double materiality assessment questionnaire ESG Working Group meetings	Operational issues related to sustainability topics
Own employees	Employee satisfaction survey "Ask the Management" forum Internal communication newsletters	Remuneration policy, employee well-being, work-life balance, appropriate working environment
ESG expert team	ESG Working Group meetings ESG team meetings	Sustainability business policy
Industry organisations and Trade Unions	Employee satisfaction survey Trade union forums Industry organisation meetings	Remuneration policy Employee well-being
Suppliers, subcontractors	Double materiality assessment questionnaire	Fair and compliant operation ESG risk due diligence
Clients (international and domestic)	Double materiality assessment questionnaire Customer satisfaction questionnaire Customer newsletters	Development of green portfolio Fair and compliant operation
Investors, shareholders	Double materiality assessment questionnaire Shareholder forums (according to stock exchange regulations) Reports	Sustainability business policy Sustainability remuneration issues Fair and compliant operation
Financiers (banks)	Double materiality assessment questionnaire	Fair and compliant operation

The primary form of communication is always electronic mail, supplemented by telephone and personal or virtual verbal consultations. The Company holds an annual client meeting for its key partners, where they can become familiar with the Company's current affairs and development directions.

## Stakeholder map



The aim of involving stakeholders and cooperating with them is to create a more socially and environmentally-sustainable operation. In the case of sustainability issues, stakeholder involvement occurs through various channels, primarily realised during the Company's double materiality assessment in 2024. Involvement for leaders and representatives of operational areas related to ESG was conducted through workshops, and questionnaires were sent to operational management, which included the participation of senior management (executive body). Other stakeholder groups, such as employees, customers, and suppliers, were also involved in the form of questionnaires. The ESG Committee was informed about developments and results at its inaugural meeting, where it approved the respondents' views, which were then communicated to senior management. Additionally, the insights of stakeholder groups during collaborations can be identified from customer satisfaction measurements for external parties or employee satisfaction surveys for internal stakeholders, which Waberer's Group incorporates into the double materiality assessment. The investor relations officer liaises with shareholders and analysts, fulfilling related stock exchange obligations. The HR department maintains contact with the trade unions. Members of the Company who partic-

ipated in the Waberer's Group double materiality assessment workshops represented the perspectives and experiences of key stakeholders (e.g., employees, customers) along sustainability directions. The key stakeholders' positions and Waberer's Group ESG questionnaire survey showed no significant differences; respondents expressed views consistent with the directions identified in the workshops. Waberer's Group will consider the results along the identified impacts, risks, and opportunities when updating its ESG strategy in 2025. Cost reduction and value growth appear as fundamental expectations, primarily in the transportation, freight forwarding, and logistics segments, for which Waberer's Group strives to offer appropriate solutions to maintain competitiveness.

In accordance with the 2024 double materiality assessment, incorporating the ESG Working Group's recommendations, the ESG Director presents the revised ESG Strategy to the ESG Committee. The new strategy will be published following the approval by the ESG Committee in 2025.

### 1.4.3 [SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL(S)

Based on the ESRS expectations, the Company conducted the double materiality assessment, during which various sustainability impacts, risks, and opportunities were identified. These are summarised in the table below, and the Group reflects on these in the future based on existing and planned practices and operations.

NAME OF IMPACT, RISK, OR OPPORTUNITY (IRO)	IRO CATEGORY LIKELIHOOD AND TIME HORIZON OF OCCURRENCE	AFFECTED BUSINESS LINE	SIGNIFICANCE IN THE VALUE CHAIN	DESCRIPTION OF CURRENT OR POTENTIAL IMPACTS/RISKS/OPPORTUNITIES	INTERACTION OF IROS WITH THE STRATEGY
<b>ENVIRONMENTAL: ESRS E1 – CLIMATE CHANGE</b>					
Climate-related physical risks	Financial risk Potential, short-term	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – High Direct (own activity) – High Downstream – Medium	Manifestations of physical risks in freight forwarding and complex logistics: Sea level rise Flood Landslide Ice damage Closures due to environmental reasons Emerging financial risk: Availability of resources Increase in unexpected expenses Cash flow decrease	Continuation of existing practices: Review of ESG Strategy Climate risk analysis – conducting vulnerability assessment
Climate-related physical risks	Financial risk Potential, short-term	Insurer	Upstream – Medium Direct (own activity) – High Downstream – High	Identified physical risks for the Insurer: Acute: For example, storm damage directly impacts clients' property security, thereby posing a risk to the Insurer's business results, with the risk of cash flow decrease arising. Chronic: For example, the long-term social and economic impacts of biodiversity loss may affect the Insurer's operations.	Planned steps: Expansion of the green product portfolio (Gránit Biztosító Zrt.) Conducting climate risk analysis – transitioning to scenario-based analysis (Gránit Biztosító Zrt.) Use/implementation of damage prevention tools
GHG emissions	Negative impact Current, short-term environmental impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – High Direct (own activity) – High Downstream – Medium	Sources of GHG emissions: Scope 1 emissions: Emissions from fuel consumed during transportation and freight forwarding Scope 2 emissions: Purchased electricity Heat energy used in leased properties Less than 1.09% of total emissions Scope 3 emissions: Ferry service Transport subcontractor activity Fuel purchased 44.2% of total emissions	Continuation of existing practices: Lower fuel consumption and optimisation (e.g., eco-driving training, route optimisation, reduction of empty runs) Comprehensive GHG calculation (Scope 1, 2, 3) and monitoring Planned steps Increasing the proportion of alternative propulsion vehicles in the Waberer's Group fleet – increasing the fleet of electric and LNG-powered vehicles Development and implementation of a transition plan Use of alternative fuels
Climate-related transition risks	Financial risk Potential, medium-term	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Medium Direct (own activity) – Medium Downstream – Low	Transition risks: Increase in procurement prices (raw materials, equipment) Resource needs and potential fines due to regulatory expectations and reporting obligations entering into force (e.g., EU Taxonomy Regulation) Shift in customer preferences towards more sustainable modes of transport Financial risks: Availability of resources Impact of procurement price increase Influencing stakeholder relations (e.g., supply chain, external stakeholders)	Continuation of existing practices: Proactively tracking changes in the legal environment Planned steps: Adapting to customer demands regarding green transport solutions, for example: increasing the volume of intermodal transport in the portfolio Development and implementation of a transition plan

Climate-related transition risks	Financial risk Potential, short-term	Insurer	Upstream – Low Direct (own activity) – Medium Downstream – Medium	Transition risks affecting the insurance market: Political-regulatory risks: Energy and raw material crises related to geopolitical changes Drastic changes in supply chains and trade relations Tax policy changes – regular taxes and sectoral extra taxes Technological risks: Phasing out traditional internal combustion engine technology Arising financial risks: Influencing future cash flow Influencing relations (e.g., supply chain, external stakeholders)	Continuation of existing practices: Implementation of the MNB's Green Recommendation (Gránit Biztosító Zrt.) Proactively tracking changes in the legal environment Planned steps: Review of the insurance portfolio (Gránit Biztosító Zrt.)
Developing green services	Financial opportunity Potential, short-term	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – High Direct (own activity) – High Downstream – Low	Expansion of the green portfolio – implementation of low-emission/fuel-efficient technological innovations: Increasing the share of rail and intermodal transport Increasing the use of alternative power-train vehicles and alternative fuels Developing sustainable warehousing technology Emerging financial opportunities: Strengthening market position Influencing future cash flow Influencing stakeholder relations (e.g., supply chain, external stakeholders)	Continuation of existing practices: Increasing the share of rail and intermodal transport  Further increasing green services in the transport and freight forwarding portfolio
Developing green services	Financial opportunity Potential, short-term	Insurer	Upstream – Medium Direct (own activity) – Medium Downstream – Medium	Greening the investment portfolio: Introducing environmental product incentives Loss prevention and information: Reducing clients' risks arising from climate change Reducing the Insurer's property insurance-related claims costs Emerging financial opportunities: Strengthening market position Influencing future cash flow	Planned steps: ESG-oriented review of investment policy and product portfolio in 2024 Setting targets from 2025 Developing the green product portfolio over a 3-5 year period (Gránit Biztosító Zrt.)
Energy consumption during own activities	Negative impact Current, short-term environmental impact	Waberer's Group	Upstream – Medium Direct (own activity) – Medium Downstream – Medium	Energy-intensive business activity: Purchased electricity consumption Heat energy used in leased properties Largest energy use: warehousing and logistics activities	Continuation of existing practices: Modernising refrigeration systems in warehouses Energy efficiency investment projects Modernisation of truck service To mitigate energy consumption, lighting in office buildings and warehouses has been replaced with LED lighting Planned steps: Shaping employee attitudes – creating a comprehensive energy efficiency curriculum
Increasing the proportion of decentralised energy production and renewable energy sources: office buildings and warehouses under construction	Financial opportunity Current, short-term	Waberer's Group (excluding Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Medium	Increasing independence from natural gas: Cooling/heating of office buildings with air/water heat pumps Own energy production: Installation of solar panel systems Emerging financial opportunities: Reducing operational costs Influencing future cash flow	Continuation of existing practices: Energy efficiency investment projects: Modernisation of truck service Modernising refrigeration systems in warehouses Planned steps: Construction of new energy-efficient warehouses Shaping employee attitudes – creating a comprehensive energy efficiency curriculum

SOCIAL: ESRS S1 – OWN WORKFORCE					
Establishing appropriate working conditions	Positive impact Current, short-term social impact	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	Ensuring transparency Accurately establishing working conditions in regulations and contracts Monitoring and developing working conditions: Positive perception and commitment, positive impact on employment	Continuation of existing practices: Employee satisfaction survey Processing satisfaction survey results by thematic sponsor groups – developing an action plan for development
Ensuring competitive pay	Positive impact Current, short-term social impact	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	Competitive remuneration: Attracting and retaining well-trained employees Social impact: Improving the living standards of employees and their families	Continuation of existing practices: Following industry-specific market wage trends – monitoring market benchmark data
Ensuring competitive pay in the long term	Financial risk Current, short-term	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	Trends in freight forwarding and transport: Fewer people are choosing this career path Inflationary impact: employees' higher expectations for wage hikes Emerging financial risks: Retaining and attracting human resources Increasing costs due to the involvement of new resources	Continuation of existing practices: Considering national economic and social conditions Following industry-specific market wage trends – monitoring market benchmark data
Social dialogue – platforms for employee feedback	Positive impact Current, short-term social impact	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Employee satisfaction survey Quarterly organisation of the "Ask the Management" forum Determination of focus topics	Continuation of existing practices: Regular employee satisfaction surveys, internal communication of results Processing satisfaction survey results by thematic sponsor groups – developing an action plan for development
Social dialogue – inadequate integration of employee feedback	Financial risk Current, short-term	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Importance of integrating satisfaction survey results: Improvement of working conditions, commuting support, home office, other benefits If the proposals are not fulfilled within a foreseeable time, it may lead to loss of trust and decreased commitment Emerging financial risks: Retention of human resources Higher costs for the realisation of developments	Continuation of existing practices: Regular organisation of employee satisfaction surveys, internal communication of results Processing satisfaction survey results by thematic sponsor groups – developing an action plan for development Planned steps: Review of ESG Strategy
Social dialogue – Trade unions	Positive impact Current, short-term social impact	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Several trade unions operate within the Company: Close cooperation between the organisations Collective bargaining agreement – wage negotiations Positive impact on employees: Increasing employee satisfaction Increasing the efficiency of internal processes	Continuation of existing practices: Operation of trade unions
Risks arising from maintaining work-life balance	Financial risk Current, short-term	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Work-life balance – increasingly important for new generations: The freight forwarding and transport segments involve more constraints, which affect the attraction and retention of employees Emerging financial risks: Retaining and attracting human resources Higher costs due to constantly changing demands and industry changes	Planned steps: Review of ESG Strategy Continuation of existing practices: Processing satisfaction survey results by thematic sponsor groups – developing an action plan for development

Commitment to health protection and safety	Positive impact Current, short-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Mitigating exposure to health risks: Waberer's Group supports participation in regular health screenings Commitment to health protection: Increases employee satisfaction and well-being	Planned steps: Review of ESG Strategy Continuation of existing practices: Provision of regular screenings Discounted sports opportunities, on-site gyms
Gender equality – women in management	Positive impact Current, medium-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	The proportion of female employees in freight forwarding is traditionally low, and Waberer's Group also strives to create equal opportunities and attract female employees Positive perception and employee satisfaction	Continuation of existing practices: Provision of female mentors for female drivers Monitoring the implementation of European Union legislation into national law Planned steps: Review of ESG Strategy
Training and skill development	Positive impact Current, medium-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Development of white-collar workforce: supporting goal setting and career planning through annual performance assessments Attracting young people: opportunity for dual training Opportunity to obtain various driver's licences Positive impact on employees: Advancement opportunities, foreseeable career development	Continuation of existing practices: Development of performance assessment system Provision of training Planned steps: Review of ESG Strategy
Measures against workplace violence and harassment	Positive impact Current, medium-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Positive social impact: Creation of a safe workplace Increase in trust and commitment among employees	Continuation of existing practices: Preventive measures, policies, and training Whistle-blowing system for thorough investigation of arising incidents
Equal opportunities – ethnicities	Positive impact Current, medium-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Employees with diverse ethnic backgrounds, especially among drivers who come from various countries Positive impact on employees: Domestic and foreign employees can mutually learn from each other Development of a healthy competitive spirit, encouraging performance and innovation	Continuation of existing practices: Internal communication about positive impacts Planned steps: Introduction of sensitivity training at the various sites
<b>SOCIAL: ESRS S2 – WORKERS IN THE VALUE CHAIN</b>					
Establishing appropriate working conditions	Positive impact Current, short-term social impact	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Ensuring transparency: Accurately establishing working conditions in regulations and contracts Monitoring of employment agencies Monitoring and improving working conditions Positive perception and commitment Positive impact on employment	Continuation of existing practices: Feedback from temporary workforce is also included in employee satisfaction surveys Processing satisfaction survey results by thematic sponsor groups – developing an action plan for development
Competitive pay	Positive impact Current, short-term social impact	Waberer's Group (excluding Magyar Posta Insurers)	Upstream – Low Direct (own activity) – Medium Downstream – Low	Competitive remuneration: Attracting and retaining well-trained employees Social impact: Improving the living standards of employees and their families	Continuation of existing practices: Following industry-specific market wage trends – monitoring market benchmark data
Commitment to health protection and safety	Positive impact Current, short-term social impact	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Mitigating exposure to health risks: The health and safety management system covers all employees	Continuation of existing practices: Provision of screenings Planned steps: Review of ESG Strategy

Training and skill development	Positive impact Potential, medium-term social impact	Transport, freight forwarding and logistics	Upstream – Low Direct (own activity) – Medium Downstream – Low	Temporary workforce is also entitled to training and skill development, with participation in training sessions provided Positive impact on employees Opportunity for development Career planning	Continuation of existing practices, which cover all employees: Provision of training Planned steps: Review of ESG Strategy
<b>SOCIAL: ESRs S4 – INFORMATION-RELATED IMPACTS ON CONSUMERS AND END-USERS</b>					
Accurate and complete information for customers	Positive impact Current, short-term social impact	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	Collaboration with partners: Balanced cooperation and accurate, mutual sharing of information are of paramount importance Mutual expectation of thoroughness and reliability from partners Positive impact: Transparency, predictability	Continuation of existing practices: Strict adherence to contractual terms
Accurate and complete information for customers	Financial risk Potential, short-term	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	One of the most important factors is transparent business conduct: Accurate information for customers Protection of consumers from abuse Credibility and compliance with legislation Transparency of contracts Risks: Legal incidents and reputational risk Cash flow change	Continuation of existing practices: Strict adherence to contractual terms Credibility and compliance with legislation
<b>SOCIAL: S – ENTITY-SPECIFIC</b>					
SOCIAL RESPONSIBILITY	Positive impact Current, medium-term environmental and social impact	Waberer's Group	Upstream – Medium Direct (own activity) – High Downstream – Medium	Main CSR activities of Waberer's Group: Support for the education of disadvantaged children and young people in need Regular support for foundations and organisations Health preservation programmes Impacts of the Company's community involvement: Positive impact on employees, customers, and supported social groups Positive impact on the immediate environment through CSR activities	Continuation of existing practices: Donations, sponsorships
<b>ECONOMIC: ESRs G1 – BUSINESS CONDUCT</b>					
Positive impacts related to compliance with regulations and procedures	Positive impact Current, short-term social impact	Waberer's Group	Upstream – Low Direct (own activity) – High Downstream – High	Importance of business conduct: Compliance processes Well-regulated rules of procedure Compliance with national and EU legislation Positive impact on society: Ethical corporate operation Addressing legal issues Communication with stakeholders	Continuation of existing practices: Implementation of internal regulations and instructions Compliance with national and other EU legislation
Effective political engagement and lobbying activities	Positive impact Current, short-term social impact	Transportation, freight forwarding and logistics (and Magyar Posta Insurers)	Upstream – High Direct (own activity) – High Downstream – High	Industry representation before legislature Impact of the Company's market role, such as the integration of sustainability measures into the industry Industry-specific developments and implementation of best practices Positive impact: Initiating changes from an ESG perspective	Continuation of existing practices: Industry representation

Maintaining relationships with reliable subcontractors and suppliers	Positive impact Current, short-term social impact	Transport, freight forwarding and logistics	Upstream – Medium Direct (own activity) – Medium Downstream – Medium	Expectation of transparency Rating and due diligence based on well-documented rules Only certified subcontractors may perform transportation Certification requirements: appropriate liability insurance and GPS tracking system Payment terms laid down in the Group Procurement Policy Positive impact: Precise definition and adherence to the method and deadline of payment Encouragement of ethical and transparent operation	Continuation of existing practices: Implementation of internal regulations and instructions
Prevention and detection of corruption	Positive impact Current, short-term social impact	Waberer's Group	Upstream – Low Direct (own activity) – Medium Downstream – Low	Corruption prevention rules: Anti-corruption guidelines for Waberer's International Nyrt. and enterprises within the consolidation scope Value of gifting, method of signing for the company and remittance, procedure for reporting suspected corruption cases	Continuation of existing practices: Implementation of regulations and instructions Operation of a whistle-blowing system Gránit Biztosító – Establishment of anti-corruption training
<b>ECONOMIC: G – ENTITY-SPECIFIC</b>					
Data security and data protection – protection of personal data	Financial risk Potential, short-term	Insurer	Upstream – Low Direct (own activity) – High Downstream – High	Data security regulations and mechanisms are essential for legal compliance The likelihood of a cybersecurity risk occurring is low, but the impact can be severe Potential risks: Unauthorised leakage of customer data to a third party High reputational risk, loss of trust Future cash flow decrease	Continuation of existing practices: Gránit Biztosító: Application of data protection mechanisms prescribed by the Magyar Nemzeti Bank
Risk management – transition risks and expansion of the product portfolio	Financial risk Potential, medium-term	Insurer	Upstream – High Direct (own activity) – High Downstream – High	Transition risks affecting the insurance market: Political-regulatory risks: Energy and raw material crisis related to geopolitical changes Drastic changes in supply chains and trade relations Tax policy changes – regular taxes and sectoral extra taxes Technological risks: Phasing out traditional internal combustion engine technology Emerging financial risks: Influencing future cash flow Influencing stakeholder relations (e.g., supply chain, external stakeholders)	Continuation of existing practices: Implementation of the MNB's Green Recommendation (Gránit Biztosító Zrt.) Proactively tracking changes in the legal environment Review of the insurance portfolio Planned steps: Gránit Biztosító: Conducting climate risk analysis – transitioning to scenario-based analysis Use of loss prevention tools

## 1.5 IMPACT, RISK AND OPPORTUNITY MANAGEMENT

The double materiality assessment provided the Company with the opportunity to identify and evaluate the impacts, risks, and opportunities arising from its operations, considering both the impact on sustainability and the influence of sustainability factors on business performance.

This approach aids in strategic decision-making, risk management, and long-term value creation, ensuring that the Company proactively responds to sustainability challenges and opportunities.

### 1.5.1 DISCLOSURES ON THE MATERIALITY ASSESSMENT PROCESS

The following disclosures aim to demonstrate how the Company identified and evaluated the most important environmental, social, and governance (ESG) factors and their business impacts. This ensures the process's comprehensibility and reliability for stakeholders, promoting responsible and data-driven decision-making.

### 1.5.2 [IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

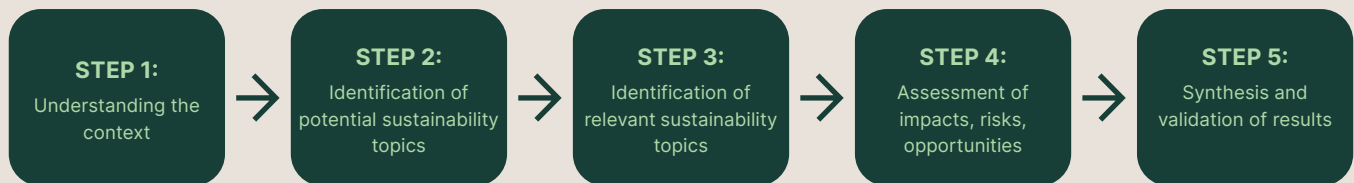
The 2024 financial year is the first in which the Company publishes its sustainability report under the Corporate Sustainability Reporting Directive (CSRD). The Company's double materiality assessment was

prepared based on the guidelines of the ESRS framework published by the European Union. In 2023, the Company's first materiality assessment was conducted differently, according to the GRI methodology. For this reason – due to significant differences between the standards – the Company does not draw parallels in this report, considering the ESRS analysis as the starting point for the coming years. The main reason for the differences is the substantial distinction between double and “simple” materiality assessments. To conduct the materiality assessment according to ESRS, the Company also considered the previous year's materiality assessment under the GRI.

By conducting the double materiality assessment (hereinafter: DMA) and determining its material topics, the Company can ensure that it focuses its resources on areas where it can achieve greater environmental, social impact or financial opportunity, and where it is most necessary to reduce negative environmental impacts and prevent financial risks. The ESRS reporting requirement proposes a methodological approach to the double materiality assessment and provides criteria to

determine whether a sustainability topic may prove material in relation to Waberer's operations. Based on the assessment, the Company identified the material ESG topics and related information to be disclosed in this report, demonstrating their relevance, associated risks, opportunities and impacts, indicators, and strategic objectives. The material sustainability topics were identified with the aim of clearly guiding the Waberer's Group towards compliance with the CSRD, which is based on the EU expectations transposed into the domestic “Act C of 2000 on Accounting”. Beyond legal compliance, sustainability is a fundamental strategic pillar of the Company, thus the goal is not only legal compliance but also the development of the service portfolio, meeting customer, financier, and shareholder needs at the highest possible level, including accurate sustainability data reporting. The impacts, opportunities, and risks detailed in the previous chapter strongly influence the Company's strategic approach.

In the reporting period, the Company examined its material sustainability topics, taking into account recent geopolitical events, changes in market and stakeholder priorities, and relevant reporting standards. The workshop revealed, among other things, changes in the labour market, the growing demand for green services, and the importance of compliance with regulatory requirements.



The first step of the double materiality assessment was mapping the Company's value chains, in the course of which external and internal stakeholders were also identified. The company structure underlying this is available on the [Company's website](#). For the sake of transparency, the subsidiaries were categorised along three main business segments – transportation and freight forwarding, logistics, and insurance – this categorisation is seen in several sections later on. The

primary reason for the difference among stakeholder groups may be the partly B2C (business-to-customer) operation of the insurance segment, as opposed to the B2B (business-to-business) model of other business lines. The name “Transportation, Freight Forwarding and Logistics,” refers to the subsidiaries of Waberer's Group that are within the scope of the consolidated financial statements, the list of which is contained in Chapter 1.1.1 [BP-1] General basis for the preparation of sus-

tainability statements, except for Gránit Biztosító and Magyar Posta Insurers. Magyar Posta Insurers joined the Group at the end of November 2024, thus there was insufficient time to conduct the DMA again or to fully integrate into the Group's ESG operations. In view of this, they reviewed the already identified topics material to the Company and provided their opinion from their own perspective. Based on the results of the review, the material topics are in line with the Company's double

materiality assessment, and no new topics were identified. This may be because Gránit Biztosító, whose industry matches that of the newly joined Magyar Posta Insurers, is already part of the Company. Magyar Posta Insurers only identified topics that, given their own operations, were excluded from Group-level material topics, so the scope of material topics narrowed in their case but did not expand. The following identified topics are not relevant to the operations of Magyar Posta Insurers:

- Increasing the proportion of decentralised energy production and renewable energy sources: office buildings and warehouses under construction;
- Social dialogue;
- The entire topic of workers in the value chain,
- as well as relationships with reliable subcontractors and suppliers.

Through its transportation activities, Waberer's Group is present across the entire European continent, focusing its insurance activities on Hungary. Understanding the context was aided by analysing competitors' practices and reviewing the results of the GRI-based materiality assessment conducted in previous years, alongside the SASB standards.

During the second and third steps, potential sustainability topics were identified. First, a comprehensive long list was created, followed by a narrowed short list. The two-step approach provided a broad overview, thereby assisting in identifying the most relevant sustainability topics for the Company and ensuring comprehensiveness. The Company determined the relevant sustainability topics based on the following:

- ESRS thematic framework,
- SASB industry-specific standards,
- results of benchmark analyses,
- industry-specific characteristics,
- expertise of operational leaders,
- and the findings from the previous year's sustainability report.

The initial determination of relevant topics was conducted with the involvement of internal stakeholders, in collaboration with the heads of the Company's operational areas. In certain cases, impacts, risks, and opportunities were broken down along the two significantly different business activity areas:

- Transport, freight forwarding, logistics

- Insurer

The ranking of the materiality of impacts was determined by evaluating the magnitude of the impact, scope, likelihood of occurrence, and relative severity.

The identification of risks and opportunities (financial materiality) was carried out by considering risks and opportunities arising from past and future events and assessing dependency on natural, human, and social resources as sources of financial risks or opportunities. The ranking of financial materiality was determined by evaluating the continuation of resource use, reliance on relationships, other factors affecting future cash flow, likelihood of occurrence, and relative severity.

In identifying and assessing impacts, the Company considered the impacts related to the defined sustainability issues and their materiality. The purpose of the assessment was to determine the extent to which these impacts affect the environment, society, and stakeholders, and what business risks and opportunities they present for the Company. For the identified material impacts, special attention was given to financial risks and opportunities, which were mapped out in detail along each topic.

The fourth step was the materiality assessment of impacts, risks, and opportunities, based on predetermined qualitative and quantitative scoring criteria. The evaluation and scoring of the narrowed short list were conducted with the involvement of operational heads from the relevant areas, through workshops. Thresholds were established for both financial and impact materiality, with values equal to or exceeding these thresholds deemed significant, or material, to the Company's operations. For impacts, the materiality threshold was set at 50%, while for risks and opportunities, at 35%. The Company determined the same materiality threshold value for both positive and negative impacts. Due to different evaluation criteria, scores were proportioned to the maximum scores that could be given for positive and negative impacts. The percentage result determination aids in comparing negative and positive impacts. The operational heads of the areas and the representative of Gránit Biztosító jointly established the threshold value, building on the totality of impacts, risks, and opportunities reviewed during the impact, risk, and opportunity (IRO) assessment, the professional in-

sights of the operational heads, and industry characteristics.

As part of the fifth step, additional external and internal stakeholders were involved through the completion of a questionnaire. The questionnaire served for stakeholders to review, prioritise, and supplement the material topics identified in the first round, if they deemed it necessary. Based on the feedback, no new material topics were identified, and the established order closely aligned with the internal expert evaluation results. Following the validation of stakeholders presented in the chapter titled [SBM-2] Interests and views of stakeholders (including, among others, own employees, suppliers, customers), the results were synthesised. The final material topics determined at the Group-level were approved by the Waberer's Group ESG Committee.

The results of the DMA assessment provide a foundation for the ESG Working Group to more accurately align the Company's operational activities and ESG performance. The new targets and measures determined by considering the impacts, risks, and opportunities identified during the assessment will be incorporated into the revised ESG Strategy of Waberer's Group in the 2025 financial year.

## 1.5.3 [IRO-2] DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT

ESRS	DISCLOSURE REQUIREMENT	PAGE	REFERENCE	NOTE
	<b>ESRS 2</b>	<b>30</b>		
	<b>BASIS FOR THE PREPARATION OF THE REPORT</b>	<b>30</b>		
[BP-1]	General basis for the preparation of sustainability statements	30	Waberer's Group consolidated annual report and consolidated business report, 2024	
[BP-2]	Disclosures in relation to specific circumstances	33		
	<b>GOVERNANCE</b>	<b>34</b>		
[GOV-1]	The role of the administrative, management and supervisory bodies	34	Waberer's Group consolidated financial statements and consolidated business report, 2024 Waberer's Group investor sub-page	
[GOV-2]	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	38		
[GOV-3]	Integration of sustainability-related performance in incentive schemes	38	Waberer's International Nyrt. Remuneration Report	
[GOV-4]	Statement on due diligence	38		
[GOV-5]	Risk management and internal controls over sustainability reporting	39		
	<b>STRATEGY</b>	<b>41</b>		
[SBM-1]	Strategy, business model and value chain	41	Waberer's Group consolidated financial statements and business report, 2024	
[SBM-2]	Interests and views of stakeholders	48		
[SBM-3]	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	51		
	<b>IMPACT, RISK AND OPPORTUNITY MANAGEMENT</b>	<b>67</b>		
	<b>DISCLOSURES ON THE MATERIALITY ASSESSMENT PROCESS</b>	<b>67</b>		
[IRO-1]	Description of the processes to identify and assess material impacts, risks and opportunities	67	Waberer's Group investor sub-page	
[IRO-2]	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	70		
	<b>MINIMUM DISCLOSURE REQUIREMENT ON POLICIES AND ACTIONS</b>	<b>78</b>		
[MDR-P]	Policies adopted to manage material sustainability matters	78		
[MDR-A]	Actions and resources in relation to material sustainability matters	78		
	<b>ESRS 1</b>	<b>79</b>		
	<b>ENVIRONMENTAL INFORMATION</b>	<b>79</b>		
	EU Taxonomy	79	Waberer's Group consolidated annual report and business report, 2024	

[E1]	CLIMATE CHANGE	94		
[GOV-3]	Integration of sustainability-related performance in incentive schemes	94		
[SBM-3]	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	94		
[IRO-1]	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	95		
[E1-1]	Transition plan for climate change mitigation	96		
[E1-2]	Policies related to climate change mitigation and adaptation	96		
[E1-3]	Actions and resources in relation to climate change policies	97		
[E1-4]	Targets related to climate change mitigation and adaptation	100		
[E1-5]	Energy consumption and mix	101	Waberer's Group consolidated annual report and business report, 2024	
[E1-6]	Gross Scopes 1, 2, 3 and Total GHG emissions	103	Waberer's Group consolidated annual report and business report, 2024	
[E1-9]	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	-		Utilising the option of phasing-in, the Company does not disclose information on anticipated financial effects in the first year of preparing the sustainability report.
[S1]	<b>SOCIAL INFORMATION</b>	<b>107</b>		
	<b>OWN WORKFORCE</b>	<b>107</b>		
[SBM-3]	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	108		
[S1-1]	Policies related to own workforce	109		
[S1-2]	Processes for engaging with own workers and workers' representatives about impacts	114		
[S1-3]	Processes to remediate negative impacts and channels for own workers to raise concerns	115		
[S1-4]	Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches	117	Waberer's Group consolidated annual report and business report, 2024	
[S1-5]	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	119		
[S1-6]	Characteristics of the undertaking's employees	121		
[S1-7]	Characteristics of non-employee workers in the undertaking's own workforce	125		
[S1-8]	Collective bargaining coverage and social dialogue	125		
[S1-9]	Diversity metrics	127		
[S1-10]	Adequate wages	128		
[S1-11]	Social protection	128		

[S1-12]	Persons with disabilities	128		
[S1-13]	Training and skills development metrics	129		
[S1-14]	Health and safety metrics	130		
[S1-15]	Work-life balance metrics	132		
[S1-16]	Remuneration metrics (pay gap and total remuneration)	133		
[S1-17]	Incidents, complaints and severe human rights impacts	134		
[S2]	<b>WORKERS IN THE VALUE CHAIN</b>	<b>135</b>		
[SBM-3]	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	135		
[S2-1]	Policies related to value chain workers	136		
[S2-2]	Processes for engaging with value chain workers about impacts	136		
[S2-3]	Processes to remediate negative impacts and channels for value chain workers to raise concerns	136		
[S2-4]	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	136		
[S2-5]	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	137		
[S4]	<b>CONSUMERS AND END-USERS</b>	<b>138</b>		
[SBM-3]	Material impacts, risks and opportunities and their interaction with strategy and business model(s)	138		
[S4-1]	Policies related to consumers and end-users	139		
[S4-2]	Processes for engaging with consumers and end-users about impacts	142		
[S4-3]	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	143		
[S4-4]	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	143		
[S4-5]	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	146		
[S - Entity-specific]	Community involvement	147		
	<b>GOVERNANCE INFORMATION</b>	<b>151</b>		
[GOV-1]	The role of the administrative, management and supervisory bodies	151	Waberer's Group Code of Ethics	
[IRO-1]	Description of the processes to identify and assess material impacts, risks and opportunities	151		

[G1-1]	Corporate culture and business conduct policies and corporate culture	152		
[G1-2]	Management of relationships with suppliers	158		
[G1-3]	Prevention and detection of corruption and bribery	160	Waberer's Group - Anti-corruption guidelines Waberer's Group - Whistle-blowing reports	
[G1-4]	Confirmed incidents of corruption or bribery	161		
[G1-5]	Political influence and lobbying activities	162		
[G1-6]	Payment practices	163		
[G - Entity-specific]	Data security and data protection	165		
[G - Entity-specific]	Risk management	167		

#### List of data points derived from other EU legislation<sup>5</sup>

DISCLOSURE REQUIREMENT	RELATED DATA POINT	PAGE	REFERENCE	NOTE
ESRS 2 GOV-1	Board's gender diversity paragraph 21 (d)	35		
	Percentage of board members who are independent paragraph 21 (e)	35		
ESRS 2 GOV-4	Statement on due diligence paragraph 30	38		
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Not relevant		
	Involvement in activities related to chemical production paragraph 40 (d) ii			
	Involvement in activities related to controversial weapons paragraph 40 (d) iii			
	Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			
ESRS E1-1	Transition plan to reach climate neutrality by 2050 paragraph 14	96		
	Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	Not relevant		
ESRS E1-4	GHG emission reduction targets paragraph 34	100		
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	101		
	Energy consumption and mix paragraph 37	101		
	Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	103		

<sup>5</sup> The table includes all data points derived from other EU legislation listed in Appendix B of ESRS 2, where they can be found in the report, and which data points are not applicable to the Company.

DISCLOSURE REQUIREMENT	RELATED DATA POINT	PAGE	REFERENCE	NOTE
ESRS E1-6	Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	103		
	Gross GHG emissions intensity paragraphs 53 to 55	107		
ESRS E1-7	GHG removals and carbon credits paragraph 56	Not material		
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Not yet reported due to phasing-in		
	Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)			
	Location of significant assets at material physical risk paragraph 66 (c)			
	Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)			
	Degree of exposure of the portfolio to climate-related opportunities paragraph 69			
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Not material		
ESRS E3-1	Water and marine resources paragraph 9	Not material		
	Dedicated policy paragraph 13			
	Sustainable oceans and seas paragraph 14			
ESRS E3-4	Total water recycled and reused paragraph 28 (c)	Not material		
	Total water consumption in m3 per net revenue on own operations paragraph 29			
ESRS 2 – IRO 1 – E4	paragraph 16 (a) i	Not material		
	paragraph 16 (b)			
	paragraph 16 (c)			
ESRS E4-2	Sustainable land / agriculture practices or policies paragraph 24 (b)	Not material		
	Sustainable oceans / seas practices or policies paragraph 24 (c)			
	Policies to address deforestation paragraph 24 (d)			
ESRS E5-5	Non-recycled waste paragraph 37 (d)	Not material		
	Hazardous waste and radioactive waste paragraph 39			
ESRS 2 – SBM3 – S1	Risk of incidents of forced labour paragraph 14 (f)	108		
	Risk of incidents of child labour paragraph 14 (g)	108		

DISCLOSURE REQUIREMENT	RELATED DATA POINT	PAGE	REFERENCE	NOTE
ESRS S1-1	Human rights policy commitments paragraph 20	109		
	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	112		
	Processes and measures for preventing trafficking in human beings paragraph 22	112		
	Workplace accident prevention policy or management system paragraph 23	112		
ESRS S1-3	Grievance/complaints handling mechanisms paragraph 32 (c)	115		
ESRS S1-14	Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	130		
	Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	130		
ESRS S1-16	Unadjusted gender pay gap paragraph 97 (a)	133		
	Excessive CEO pay ratio paragraph 97 (b)	134		
ESRS S1-17	Incidents of discrimination paragraph 103 (a)	134		
	Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	134		
ESRS 2 – SBM3 – S2	Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Not relevant		
ESRS S2-1	Human rights policy commitments paragraph 17	136		
	Policies related to value chain workers paragraph 18	136		
	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	136		
	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	136		
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	136		
ESRS S3-1	Human rights policy commitments paragraph 16	Not material		
	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17			
ESRS S3-4	Human rights issues and incidents paragraph 36	Not material		
ESRS S4-1	Policies related to consumers and end-users paragraph 16	139		
	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 17	141		
ESRS S4-4	Human rights issues and incidents paragraph 35	145		

DISCLOSURE REQUIREMENT	RELATED DATA POINT	PAGE	REFERENCE	NOTE
ESRS G1-1	United Nations Convention against Corruption paragraph 10 (b)	Not relevant		
	Protection of whistle-blowers paragraph 10 (d)	156		
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	161		
	Standards of anti-corruption and anti-bribery paragraph 24 (b)	161		

## 1.5.4 MINIMUM DISCLOSURE REQUIREMENT ON POLICIES AND ACTIONS

[MDR-P] The policies adopted to address material sustainability issues are presented in relation to the chapters.

Actions and resources in relation to material sustainability matters are detailed in the chapters dealing with disclosure requirements in the thematic and sector-specific ESRS.

### 1.5.5 [MDR-A] ACTIONS AND RESOURCES IN RELATION TO MATERIAL SUSTAINABILITY MATTERS

## ENVIRONMENTAL INFORMATION

Waberer's is committed to reducing the impacts of climate change, therefore it pays special attention to measuring emissions, developing a reduction plan – alongside industry constraints – and energy efficiency. This chapter presents the Company's current climate strategy, the development of its greenhouse gas emissions, and the risk management and adaptation measures.

### 2.1 EU TAXONOMY

According to Article 8 of the EU Taxonomy Regulation (Regulation (EU) 2020/852), financial and non-financial undertakings required to publish sustainability reports must report on how and to what extent their activities are considered sustainable.

This information must show the extent to which the turnover, operating expenditure (OpEx) and capital expenditure (CapEx) related to the activities defined in the EU Taxonomy Regulation are linked to environmentally-sustainable activities. In addition, for insurers, the proportion of their investments related to sustainable activities must also be examined. Pursuant to the current legal regulations, for the 2024 financial year, it is necessary to examine

and disclose contributions and activities related to all six environmental objectives, which are as follows:

- climate change mitigation,
- adaptation to climate change,
- sustainable use of water and marine resources,
- transition to a circular economy,
- prevention of environmental pollution,
- and protection of biodiversity and ecosystems.

The EU Taxonomy analysis examines relevant economic activities in two steps: first, it is necessary to determine whether the economic activity conducted by the Company meets any of the definitions set out in the EU Taxonomy Regulation, thereby establishing Taxonomy-eligible activities. For economic activities that meet the definitions under the Regulation, further examinations are required. During this process, it is determined whether the given economic activity is considered Taxonomy-aligned, meaning it significantly contributes to at least one environmental objective, does not significantly harm the other five environmental objectives, and meets the minimum social safeguards.

In the case of investment examinations, it is necessary to examine the Taxonomy-aligned turnover and CapEx performance metrics of the Company receiving the investment.

### PRESENTATION OF ECONOMIC ACTIVITIES EXAMINED FROM THE PERSPECTIVE OF THE EU TAXONOMY

During the eligibility examination, the Company identified its significant revenue-generating economic activities and the economic activities that resulted in significant operating or capital expenditure in the 2024 financial year, which are in line with the EU Taxonomy Regulation's requirements, thus qualifying as activities that are Taxonomy-eligible. The Company started from the values defined as denominators for KPIs set in the EU Taxonomy disclosure requirements (2021/2178) for non-financial companies and insurers: it based its analysis on the 2024 financial year's turnover, CapEx, and OpEx statements. The Company identified material economic activities based on the principles of financial materiality defined in its accounting policy, comparing the annual turnover-generating activities and expenditures – their respective ledger categories and content – with the scope of activities defined in the EU Taxonomy Regulation. The examination was based on the Taxonomy definition of economic activity, in accordance with the provisions of the published and effective delegated regulations containing technical screening criteria.

In the course of EU Taxonomy compliance, the Company identified the following eligible economic activities as relevant to its operations:

- CE 5.4 Sale of second-hand goods (substantial contribution to the objective of transition to a circular economy);
- CCM 6.6 Freight transport services by road (substantial contribution to the objective of climate change mitigation);
- CCM 7.1 Construction of new buildings (substantial contribution to the objective of climate change mitigation);
- CCM 7.3 Installation, maintenance, and repair of energy efficiency equipment (substantial contribution to the objective of climate change mitigation);

tion);

- CCM 10.1 Non-life insurance: underwriting of climate-related perils (substantial contribution to the objective of climate change adaptation).

The characteristics of the various activities and compliance with the related screening criteria are detailed in the following section of the chapter. There is no alignment with the EU Taxonomy at the Company in 2024, as it does not meet the minimum safeguards requirements.

#### 5.4 SALE OF SECOND-HAND GOODS

Upon the expiration of lease agreements, the Company purchases vehicles in some cases and sells them to third parties through sales contracts, generating revenue. The vehicles sold in this manner are typically used tractors, trailers, trucks, and vans classified as N1, N3, or O4. The refurbishment and cleaning requirements are met according to the technical screening criteria, and the reuse, processing, or disposal of the resulting waste is carried out by an external partner, as the Company does not have a dedicated waste management plan. Waberer's Group, with expert assistance, conducted a climate risk and vulnerability assessment for road freight transport. Since the vehicles sold were always used in road freight transport, no significant risk was identified that would affect the conduct of the activity. The activity does not involve significant water use or have harmful effects on water status or water bodies, thus not justifying the existence of a water use and water protection management plan. Waberer's Group examines the quality of drinking water semi-annually, and a report is prepared from the water intake points of the buildings on the premises. Of the vehicles sold under contractual arrangements in 2024, 95% or 624 units meet the EURO VI requirements, and of these, 505 units meet the rolling noise class and rolling resistance expectations for tyres. The activity is considered Taxonomy-eligible at the Company, fulfilling the DNSH<sup>6</sup> criteria but not aligned, as the minimum safeguards are not met.

Related financial indicators: turnover, OpEx

#### 6.6 FREIGHT TRANSPORT SERVICES BY ROAD

A significant portion of the Company's turnover comes from road freight transport activities, and there was also an expansion of the vehicle fleet in the year in question (CapEx side), thus qualifying as a material activity to be examined. The Company's operational vehicle fleet includes various types of vehicles, such as tractors, semi-trailers, trucks, trailers, and vans. The Company considers it important to make its vehicle fleet more sustainable, thus it is continuously expanding it with models featuring alternative propulsion, including modern electric vehicles and LNG-powered vehicles. The road freight transport activity is considered Taxonomy-eligible for the entire vehicle fleet used for road freight transport, which, in accordance with the Taxonomy regulation, includes vehicles with EURO VI engine types or electric vehicles classified as N1, N2, N3. Within the framework of the technical screening criteria, the Company examined the emission characteristics of vehicles according to certain categories (N1, N2, N3), where electric powertrain vehicles meet the significant contribution criterion – zero emissions – of which there are currently 14 in total in use by the Company, including 2 test vehicles. In the current year, the Company conducted a climate risk and vulnerability assessment for the activity, during which no significant climate risk was identified, and for the identified low-rated risks, the Company has appropriate adaptation measures in place. Of the electric vehicles, 4 meet the rolling noise class and rolling resistance expectations for tyres, which are not related to pollutants defined in the case of the prevention and reduction of environmental pollution. These electric vehicles are at least 85% by weight reusable or recyclable, and at least 95% by weight reusable or recoverable. For the 4 electric powertrain vehicles, the technical screening criteria are met. For the activity, only the minimum social safeguard is not met by Waberer's Group for 2024.

Related financial indicators: turnover, CapEx, OpEx

#### 7.1 CONSTRUCTION OF NEW BUILDINGS

At the Company, Taxonomy-eligibility can currently be interpreted for three ongoing or completed real estate construction projects: a logistics centre in Debrecen, and two in Ecser. One of the completed build-

6 Do No Significant Harm. Based on this, a Taxonomy-aligned must not cause significant harm in any of the other five areas.

ings in Ecser has obtained BREEAM “very good” rating, and the same is planned for the construction project in Debrecen. Currently, the construction project in Debrecen and the other warehouses in Ecser are still ongoing, meaning that the evaluation according to the EU Taxonomy was carried out based on the plans. All three properties are classified as buildings for other purposes, their energy ratings meet the Taxonomy expectations, achieving at least an A+ rating. In the completed warehouse in Ecser, no airtightness and thermal insulation tests were conducted, as these tests are not applicable given the building's purpose (logistics hall). For Debrecen and the completed Ecser centre, a global warming potential calculation for the entire lifecycle was conducted during the BREEAM compliance process. Preliminary examination documentation was drawn up for the three real estate construction projects, addressing climate protection aspects, identifying potential impacts on the area, with a climate change adaptation strategy prepared for the Debrecen project, while the environmental assessment for the completed Ecser building includes climate vulnerability and risk assessment, thus meeting the climate change adaptation criterion, and for the third, the Company plans to implement this in the following year. According to the DNSH criteria, several criteria are met for the Debrecen and completed Ecser properties: the management of generated waste complies with the EU Taxonomy expectations, and no harmful substances listed in the pollution prevention and reduction criteria were used for construction. Furthermore, measures in line with the Taxonomy have been/will be applied to reduce dust, noise, and pollutant emissions. The land areas related to the real estate investment are not sensitive areas in terms of biological diversity. The activity is considered Taxonomy-eligible at the Company, however, it is not considered an aligned activity as it does not fully meet the significant contribution and DNSH criteria.

Related financial indicators: CAPEX

### 7.3 INSTALLATION, MAINTENANCE AND REPAIR OF ENERGY EFFICIENCY EQUIPMENT

At the Company, investments related to the technical development of properties appear, of which two projects in the cur-

rent year are Taxonomy-eligible: a lighting modernisation project at the Nagykőrösi út hall, and a sectional door replacement project at the Mosonmagyaróvár site. The activity is considered Taxonomy-eligible at the Company, but it is not aligned, as it does not fully meet the DNSH criteria.

Related financial indicators: CAPEX

### 10.1 NON-LIFE INSURANCE: UNDERWRITING OF CLIMATE-RELATED PERILS

At the Company, the subsidiaries Gránit Biztosító and Magyar Posta Biztosító conduct non-life insurance activities. The EU Taxonomy regulation details which insurance services can be interpreted as providing protection against climate-related hazards, among which the following appear at Gránit Biztosító: other motor vehicle insurance (e.g., land vehicle insurance – CASCO); marine, aviation, and transport insurance; fire and other property damage insurance. At Magyar Posta Insurers, the provision of CASCO and home insurance in connection with natural disasters (e.g., storm, hail, flood, etc.) is shown. The activities conducted by the two insurers are Taxonomy-eligible, however, they are not aligned as they do not fully meet the significant contribution and DNSH criteria.

Related financial indicators: gross premium income

#### Accounting policy related to EU Taxonomy compliance

The methodologies applied for determining key performance indicators related to turnover, capital and operating expenditures were developed in line with the provisions of Regulation 2021/2178 (EC) and its amending supplements. Compared to the 2023 financial year, the methodological approach to the assessment of Taxonomy-eligibility and alignment was refined in the current year, with clarifications appearing along the classifications, resulting in discrepancies in the proportional classification of performance indicators. The ratios included in the previous year's report related to eligible economic activities identified in the current year were presented for the comparative year, and those that were not characteristic activities this year were not separately indicated. In the next period, the methodology for 2024 is expected to be consistently applied, taking into account changes in the regulatory environment. No disclosure was made for

insurers in the previous year, thus no comparative period is presented.

### TURNOVER KPI

For non-financial companies, the eligibility performance indicator (KPI) related to turnover is defined as the ratio of turnover from products or services related to Taxonomy-eligible activities (numerator) to the consolidated net turnover for the current year (denominator). The breakdowns related to the activities were developed along the lines of the general ledger classification with the involvement of the Company's area managers responsible for certain activities and the controlling department. The Company examined the definitions of relevant activities in the EU Taxonomy regulation, compared them with the content of its own activities classified as material, thereby determining which of the material revenue-generating economic activities are Taxonomy-eligible. The details of this are presented in the table of **EU Taxonomy sub-chapter 2.1.1**. The consolidated turnover was also presented among the Company's consolidated financial statements.

### KPI RELATED TO CAPITAL EXPENDITURES (CAPEX)

The eligibility performance indicator (CapEx) related to capital expenditures is defined as the ratio of material, capitalised stock increases, interpreted according to IFRS standards, of tangible and intangible assets related to Taxonomy-eligible activities during the 2024 financial year, to the total capitalised stock increases of tangible and intangible assets incurred by the Company in the current year. For the calculation of the KPI, the Company collected the consolidated level capitalised stock increases related to tangible and intangible assets for the 2024 financial year. The breakdowns related to the activities were developed along the lines of the general ledger classification with the involvement of the Company's area managers responsible for certain activities and the controlling department. During the evaluation, the general ledger values of stock increases related to properties and vehicles were reviewed. Information on this is also available in the consolidated financial statements in the form of movement tables in the related sections of

the notes. The Company considered stock increases by asset group, and then determined which are considered significant stock increases. During the analyses, activities related to material capital expenditures were identified: they were matched to the Taxonomy criteria along the lines of activities evaluated for turnover (road freight transport) or additional new activities (construction of new buildings, installation, maintenance, and repair of energy efficiency equipment). Further disclosures related to the CapEx KPI are available in [EU Taxonomy sub-chapter 2.1.2](#).

#### **KPI RELATED TO OPERATING EXPENDITURES (OPEX)**

OpEx as a key performance indicator includes the direct, non-capitalised costs of Taxonomy-eligible activities that generate material turnover or CapEx incurred in the current year. These include the costs of research and development, building renovation, short-term leasing, maintenance and repair, as well as all other direct expenses for the daily servicing of properties, machinery, and equipment that ensure their continuous operation – whether performed by the Company or outsourced to a third party. This amount (numerator) was divided by the total OpEx amount (denominator) incurred by the Company in the current year as defined above.

The Company defined which costs incurred in the current year are classified as OpEx (operating expenditures) taking into account the EU Taxonomy requirements and the Group's Accounting Policy: the group of costs that arose during the execution of the transport task performed by the tractor and are necessary for the tractor to execute the given transport task. These are as follows: repair and maintenance costs, insurance cost, weight tax, driver wage cost, fuel cost.

For the calculation of the KPI, the Company collected the consolidated-level OpEx KPI denominator operating expenditures for the 2024 financial year, and from this list determined which expenditures qualified as operating expenditures from Taxonomy-eligible activities (numerator). The Company calculated the OPEX KPI ratio related to operating expenditures as the quotient of the numerator value and the total current year OpEx under the Taxonomy regulation. Further disclosures related to the OpEx KPI are available in [EU](#)

#### **Taxonomy sub-chapter 2.1.3.**

#### **KPI RELATED TO GROSS PREMIUM INCOME FOR GRÁNIT BIZTOSÍTÓ**

The gross premium income KPI is applicable to the Company's subsidiary operating in the insurance sector, Gránit Biztosító. Gránit Biztosító only provides insurance services to its clients in the non-life branch, and does not engage in reinsurance or life insurance activities. Gránit Biztosító determined its gross premium income from the sale of insurance services for the 2024 financial year in accordance with the definition of the EU Taxonomy regulation, filtering out intra-group revenue amounts (the insurance services have been listed above). This amount forms the numerator of the KPI ratio. For Gránit Biztosító, the Company compared the determined numerator amount to the consolidated revenue value from the total non-life insurance activity to define the KPI related to insurance risk, with further disclosures available in [EU Taxonomy sub-chapter 2.1.4](#). Magyar Posta Biztosító provides non-life insurance, however, it was not consolidated on the profit/loss side in the 2024 consolidated financial statements, thus the examination of performance metrics according to the EU Taxonomy was not conducted consistently with the financial report.

#### **KPI RELATED TO INVESTMENTS FOR INSURERS**

Gránit Biztosító, the subsidiary of Waberer's Group operating in the insurance sector, does not have Taxonomy-aligned investments, thus the value of this KPI is zero from the perspective of Waberer's Group. 85% of the combined investments of Magyar Posta Biztosító and Magyar Posta Életbiztosító are in government bonds, and the proportion of investments to be considered according to the EU Taxonomy in their other investments is 13%, typically corporate shares, investment funds, of which based on preliminary examinations – which included a review of the investments and their types along the Taxonomy expectations – a minimal extent (0.2%) of the investments would be related to the EU Taxonomy, thus no further examination was conducted in the current period, the Company will be able to present a more accurate value based on the

CSRD reports published next year, and the related table will be presented then.

## 2.1.1 PROPORTION OF TURNOVER FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING 2024

Economic activities (1)	Code(s) (2)	Sales revenue (3)	Proportion of turnover, 2024 (4)	ESSENTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA (COMPLIANCE WITH THE DO NO SIGNIFICANT HARM PRINCIPLE)						Proportion of Taxonomy-aligned (A1) or -eligible (A2) turnover, year N-1 (18)	Category: enabling activity (19)	Category: transitional activity (20)		
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)				Minimum safeguards (17)	
		EUR thousand	%	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	S	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A1. Environmentally sustainable (Taxonomy-aligned) activities</b>																				
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A1)	0	0%																0%		
Of which enabling	0	0%																	S	
Of which transitional	0	0%																		T
<b>A2. Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																				
Sale of second-hand goods	CE 5.4	14,448	1.9%	Not el.	Not el.	Not el.	Not el.	El.	Not el.									1.1%		
Freight transport by road	CCM 6.6	363,552	47.9%	El.	Not el.	Not el.	Not el.	Not el.	Not el.									73.5%		
Non-life insurance	CCA 10.1	19,323	2.5%	Not el.	El.	Not el.	Not el.	Not el.	Not el.									n/a		

Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A2)	397,323	52.4%	47.9%	2.5%			1.9%			74.6%		
A. Total turnover of Taxonomy-eligible activities (A1+A2)	397,323	52.4%	47.9%	2.5%			1.9%			74.6%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>												
Turnover of Taxonomy-non-eligible activities	360,873	47.6%										
TOTAL (A+B)	758,196	100%										

**Explanation of notations:**

Y	Yes, the activity is Taxonomy-eligible and aligned concerning the relevant environmental objective.
EI.	The activity is Taxonomy-eligible but non-aligned concerning the relevant environmental objective.
Not el.	The activity is not Taxonomy-eligible and aligned concerning the relevant environmental objective.

## 2.1.2 PROPORTION OF CAPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING 2024

Economic activities (1)	Code(s) (2)	CapEx (3)	Proportion of CapEx, 2024 (4)	ESSENTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA (COMPLIANCE WITH THE DO NO SIGNIFICANT HARM PRINCIPLE)						Proportion of Taxonomy-aligned (A1) or eligible (A2) CapEx, year N-1 (18)	Category: enabling activity (19)	Category: transitional activity (20)
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)			
		EUR thousand	%	Y; EI.; Not el.	Y; EI.; Not el.	Y; EI.; Not el.	Y; EI.; Not el.	Y; EI.; Not el.	Y; EI.; Not el.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	S	T

A. TAXONOMY-ELIGIBLE ACTIVITIES														
A1. Environmentally sustainable (Taxonomy-aligned) activities														
CapEx of environmentally sustainable (Taxonomy-aligned) activities (A1.)	0	0%											0%	
Of which enabling	0	0%												S
Of which transitional	0	0%												T
A2. Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)														
Freight transport by road	CCM 6.6	52,793	43.6%	El.	Not el.	Not el.	Not el.	Not el.	Not el.				50.1%	
Construction of new buildings	CCM 7.1	34,602	28.6%	El.	Not el.	Not el.	Not el.	Not el.	Not el.				n/a	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	97	0.1%	El.	Not el.	Not el.	Not el.	Not el.	Not el.				0.6%	
CapEx of Taxonomy-eligible but environmentally not sustainable activities (not Taxonomy-aligned activities) (A2)		87,493	72.3%	72.3%									50.7%	
A. Total CapEx of Taxonomy-eligible activities (A1+A2)		87,493	72.3%	72.3%									50.7%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES														
CapEx of Taxonomy-non-eligible activities		33,563	27.7%											
TOTAL (A+B)		121,056	100%											

#### Explanation of notations:

Y	Yes, the activity is Taxonomy-eligible and aligned concerning the relevant environmental objective.
El.	The activity is Taxonomy-eligible but non-aligned concerning the relevant environmental objective.
Not el.	The activity is not Taxonomy-eligible and aligned concerning the relevant environmental objective.

## 2.1.3 PROPORTION OF OPEX FROM PRODUCTS OR SERVICES ASSOCIATED WITH TAXONOMY-ALIGNED ECONOMIC ACTIVITIES – DISCLOSURE COVERING 2024

Economic activities (1)	Code(s) (2)	OpEx (3)	Share of OpEx, 2024 (4)	ESSENTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA (COMPLIANCE WITH THE DO NO SIGNIFICANT HARM PRINCIPLE)						Proportion of Taxonomy-aligned (A1) or -eligible (A2) OpEx, year N-1 (18)	Category: enabling activity (19)	Category: transitional activity (20)	
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)				Minimum safeguards (17)
		EUR thousand	%	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y; El.; Not el.	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	S	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A1. Environmentally sustainable (Taxonomy-aligned) activities</b>																			
Environmentally sustainable (Taxonomy-aligned) activities OpEx (A1.)		0	0%														0%		
Of which enabling		0	0%																
Of which transitional		0	0%																
<b>A2. Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Sale of second-hand goods	CE 5.4	952	0.1%	Not el.	Not el.	Not el.	Not el.	El.	Not el.								0%		
Freight transport by road	CCM 6.6	650,862	89.1%	El.	Not el.	Not el.	Not el.	Not el.	Not el.								n/a		
Non-life insurance	CCA 10.1	76,142	10.4%	Not el.	El.	Not el.	Not el.	Not el.	Not el.								0%		

OpEx of Taxonomy-eligible but environmentally not sustainable activities (not Taxonomy-aligned activities) (A2)	727,956	99.7%	89.1%	10.4%			0.1%										0%
A. Total OpEx of Taxonomy eligible activities (A1+A2)	727,956	99.7%	89.1%	10.4%			0.1%										0%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																	
OpEx of Taxonomy-non-eligible activities	2,397	0.3%															
TOTAL (A+B)	730,353	100%															

**Explanation of notations:**

Y	Yes, the activity is Taxonomy-eligible and aligned concerning the relevant environmental objective.
El.	The activity is Taxonomy-eligible but non-aligned concerning the relevant environmental objective.
Not el.	The activity is not Taxonomy-eligible and aligned concerning the relevant environmental objective.

## 2.1.4 KEY PERFORMANCE INDICATORS FOR INSURANCE RISK FOR NON-LIFE INSURERS AND REINSURERS – DISCLOSURE FOR 2024

Economic activities (1)	ESSENTIAL CONTRIBUTION CRITERIA		DNSH CRITERIA (COMPLIANCE WITH THE DO NO SIGNIFICANT HARM PRINCIPLE)					Minimum safeguards (10)
	Absolute premiums, 2024 (2)	Proportion of premiums, 2024 (3)	Climate change mitigation (5)	Water and marine resources (6)	Circular economy (7)	Pollution (8)	Biodiversity and ecosystems (9)	
EUR thousand		%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N

A1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable)	0	0%						
A1.1. Of which reinsured								
A1.2. Of which stemming from reinsurance activity								
A1.2.1. Of which reinsured (retrocession)								
A2. Non-life insurance and reinsurance underwriting Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	19,323	24.1%						
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	60,850	75.9%						
Total (A1 + A2 + B)	80,174	100%						

## 2.1.5 SUMMARY TABLES OF COMPLIANCE WITH THE EU TAXONOMY REGULATION

	PROPORTION OF TURNOVER/TOTAL TURNOVER	
	PER TAXONOMY-ALIGNED TARGET	PER TAXONOMY-ELIGIBLE TARGET
CCM	0%	47.9%
CCA	0%	2.5%
WTR	0%	0.0%
CE	0%	1.9%
PPC	0%	0.0%
BIO	0%	0.0%

	PROPORTION OF CAPEX/TOTAL CAPEX	
	PER TAXONOMY-ALIGNED TARGET	PER TAXONOMY-ELIGIBLE TARGET
CCM	0%	72.3%
CCA	0%	0.0%
WTR	0%	0.0%
CE	0%	0.0%
PPC	0%	0.0%
BIO	0%	0.0%

	PROPORTION OF OPEX/TOTAL OPEX	
	PER TAXONOMY-ALIGNED TARGET	PER TAXONOMY-ELIGIBLE TARGET
CCM	0%	89.1%
CCA	0%	10.4%
WTR	0%	0.0%
CE	0%	0.1%
PPC	0%	0.0%
BIO	0%	0.0%

## 2.1.6 TABLE OF ACTIVITIES RELATED TO NUCLEAR ENERGY AND FOSSIL GAS

ROW	NUCLEAR ENERGY RELATED ACTIVITIES	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	FOSSIL GAS RELATED ACTIVITIES	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO



# CLIMATE CHANGE

## 2.2 [E1] CLIMATE CHANGE

Climate change can have a direct impact on the logistics and insurance sector, while transport and freight forwarding themselves significantly contribute to greenhouse gas emissions.

Increasingly stringent regulations and market demand for sustainable solutions

are encouraging the sector to reduce its environmental footprint. Waberer's aims

to apply innovative, low-emission transport solutions, such as alternative power-trains and intermodal transport, thereby increasing the resilience of supply chains. Currently, Waberer's has embarked on this path.

### 2.2.1 [GOV-3] INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

**Chapter 1, [GOV-3] Integration of sustainability-related performance in incentive schemes** of the Sustainability Report elaborates on the Company's re-

muneration policy in detail. Currently, performance metrics aligned with climate change and the Company's GHG (greenhouse gas) emission reduction targets are

not yet reflected in the remuneration of senior management and board members.

### 2.2.2 [SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL(S)

The Company identified material financial opportunities and negative impacts related to climate change, as well as material financial risks associated with physical and transition risks in the transportation, freight forwarding, logistics, and insurance sectors.

The Company reviewed its risks with significant financial impact on its operations during its double materiality assessment. Within the Climate change adaptation sub-topic, the Group identified physical risks, while in the Climate change mitigation sub-topic, it determined its transition risks. The Company has not conducted a comprehensive resilience analysis; however, it has comprehensively assessed its physical risks related to the transportation and freight forwarding sector within the framework of a vulnerability assessment also linked to the EU Taxonomy, detailed in the **EU Taxonomy sub-chapter**. In the future, it plans to extend this to the core business areas.

Physical risks related to climate (such as sea level rise, floods, landslides, ice damage, and other closures due to environmental reasons) in the transportation and freight forwarding sector may disrupt the Company's road, rail, and intermodal transport activities and those within the supply chain. In logistics, climate change

may result in higher operational and/or investment costs, due to increased cooling or heating needs caused by temperature changes. These emerging financial risks may primarily cause sudden and increased costs and may affect the Group's future cash flow and previously established business relationships (supply chain, external stakeholders). Transition risks related to climate change can be identified as the increase in procurement prices of raw materials, assets, and semiconductors, the implementation of regulatory requirements and reporting obligations (such as the EU Taxonomy regulation), fines and penalties imposed for non-compliance with sustainability regulations, and shifts in customer preferences towards more sustainable modes of transport. Financial risks arising from the transition may primarily impact the availability and procurement price of resources and, similar to physical risks, may affect business relationships.

The insurance sector possesses models necessary for identifying and as-

sessing physical risks outside the double materiality assessment, which generally revolve around hazard, exposure, and vulnerability. In the case of Gránit Biztosító, both acute (e.g., storm damage) and chronic (e.g., biodiversity loss) physical risks have been identified. Acute risks have a direct impact on the Insurer's business results, cash flow, and the property security of its clients. Chronic physical risks do not directly affect the Company's operations or profitability; however, due to their long-term social and economic impacts, they emerge as indirect risks. In the case of Gránit Biztosító, several transition risks arise, including political-regulatory risks, technological risks, and market risks. All these may have significant financial impacts, which, similarly to acute risks, negatively affect the Insurer's operations and business relationships. Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt. have both assessed their physical and transition risks in the short, medium, and long term, and then evaluated the impacts of these risks on their own operations along the following risk types.

	IDENTIFIED RISK	AFFECTED POSTA INSURER
Physical risks	Heat waves	Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt.
	Frosts	Magyar Posta Életbiztosító Zrt.
	Increase in average mean temperature	Magyar Posta Életbiztosító Zrt.
	Floods	Magyar Posta Biztosító Zrt.
	Earthquake	Magyar Posta Biztosító Zrt.
	Hail	Magyar Posta Biztosító Zrt.
	Increase in storm frequency	Magyar Posta Biztosító Zrt.
	Office exposure	Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt.
Transition risks	Product regulations	Magyar Posta Életbiztosító Zrt.
	Introduction of carbon tax	Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt.
	Energy efficiency requirements	Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt.
	Costs of transitioning to lower emission technology	Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt.

The results of the Company's double materiality assessment, namely the material impacts, risks, and opportunities identified in relation to 'Climate Change' and their interaction with the strategy and business models, are presented in a detailed sum-

mary in the sub-chapter **Chapter 1, [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)** of the Sustainability Report. For Gránit and Posta Insurers, further information on the applied risk

management is available in **subchapter [G-Entity-specific] Risk management of Chapter 4** sub-chapter, considering that it practically forms the basis of the business model.

## 2.2.3 [IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

The Company identified its material climate-related impacts, risks, and opportunities in the short, medium, and long term, as defined in ERS 1, Article 6.4, along its own activities and value chain as part of its double materiality assessment.

This procedure is detailed in sub-chapter **Chapter 1, [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities** of the Sustainability Report. Processes related to the examination of physical and transition risks associated with the business activities of the insurance segment are described in **subchapter [G-Entity-specific] Risk management of Chapter 4** of the Sustainability Report. When identifying their transition risks, the Posta Insurers considered their own assets exposed from an ESG perspective and the costs of transi-

tioning to lower emission technologies. For example, the Posta Insurers identify the introduction or extension of a carbon tax as a legal risk (transition risk). Currently, there is no mandatory regulation regarding the ESG exposure of insurers' assets; however, a potential risk is the introduction or extension of a tax on exposed assets, which increases expenditures and reduces the value of the affected assets. The Posta Insurers have a positive carbon footprint, the reduction of which involves increased costs. The most effective way to reduce carbon emissions is to replace the vehicle

fleet with electric cars, but other requirements aimed at reduction may also emerge in the future. Non-compliance may result in penalties based on carbon emissions. The Company and the Insurers conducted their risk analyses along different time horizons (short, medium, and long term), however, these time intervals have not yet been aligned with the expected lifespan of the applied assets, strategic planning horizons, and capital allocation plans.

For the identification and assessment of physical and transition risks, the conclusions of the double materiality assessment and the information defined in the risk inventory of the insurance sector are available. In the 2024 financial year, the Company has not yet conducted climate change scenario analyses for the whole of the Group; however, a vulnerability as-

assessment was conducted for the transportation sector, during which no material risk was identified (details are available

in the **EU Taxonomy sub-chapter**). In the absence of a transition plan and scenario analyses, no assets and business activi-

ties incompatible with the transition to a climate-neutral economy were identified in the reporting period.

## 2.2.4 [E1-1] TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

The Company currently does not have a comprehensive transition plan for climate change mitigation, and is aiming to complete it by the 2027 financial year. The Company's goal regarding the transition plan is for it to be scientifically based.

## 2.2.5 [E1-2] POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

The Company's most important policies and regulations related to disclosure minimum requirements are:

ESRS DISCLOSURE REQUIREMENT	MATERIAL SUSTAINABILITY TOPICS	RELATED POLICIES	SCOPE OF POLICIES (INDICATION OF DEVIATION FROM GROUP SCOPE) <sup>7</sup>
E1 – Climate change	Adaptation to climate change Climate change mitigation Energy	Integrated Management Policy	Applicable to Waberer's Group subsidiaries in Hungary and the subsidiary Waberer's Romania S.R.L. It does not apply to the following subsidiaries: Waberer's Slovakia S.R.O. Waberer's International Serbian branch LINK Sp. z.o.o.
		Regulation on climate-related and environmental risks, as well as the enforcement of environmental sustainability aspects	Gránit Biztosító Zrt's environmental policy
		Integrated Management Procedure: Monitoring and tracking of environmental factors – Regulation of operation	Integrated policies of Waberer's International Nyrt., LINK Sp. z.o.o., WSZL Kft., Waberer's Network, and WSZL Autómotív Kft., which include the environmental policy
		Waberer's Group procurement policy	The Company's procurement policy It does not apply to the following subsidiaries: All in One Transport Kft. Waberer's Romania S.R.L. Waberer's Slovakia S.R.O. Waberer's International Serbian branch LINK Sp. z.o.o. Gránit Biztosító Zrt.

The Company operates a system in accordance with the ISO 9001 Quality Management standard, and integrated with this, the ISO 14001 Environmental Management, ISO 50001 Energy Management, and ISO 28000 Supply Chain Security

Management standards to meet customer and statutory requirements at a high level. Beyond the scope detailed above, the Company will extend the policy's applicability to the additional companies in the following year. A separate environmental

policy is currently not available, thus the Company has formulated its Group-level sustainability topics in the Integrated Management Policy, namely the identification, assessment, and mitigation of risks arising from the Company's activities. Sustaina-

<sup>7</sup> If the policy applies to the Company, it does not include the Magyar Posta Insurers, as they were not members of the Company for the majority of the 2024 financial year.

bility goals have been established in the ESG strategy along the main focus areas (development of green services, emission reduction, creating an attractive and progressive workplace, ensuring regulatory and internal compliance, increasing adaptability). Relevant internal stakeholders (business unit leaders, such as procurement, HR director, chief legal counsel, ESG director, and Gránit Biztosító Zrt. ESG officer) participated in setting the goals, however, the ESG and quality assurance areas have not yet been aligned regarding ISO compliance and policy development. Furthermore, in the procurement policy, the Group has formulated a separate sustainability section for its suppliers to influence emission reductions and promote green solutions along the value chain. The implementation of the Integrated Management Policy is the responsibility of the Company's Chairman-CEO, and the policy is accessible to internal stakeholders on the Company's intranet and publicly on the website. Training is also provided on its content.

Within the group, Waberer's International Nyrt, WSZL Kft., LINK Sp. z.o.o.,

Waberer's Network Kft., and WSZL Automotív Kft. have separate integrated management policies, which include the environmental policy. It is by supporting this that companies monitor and evaluate emerging environmental factors, including risk management at operated sites or emergencies occurring elsewhere due to activities. The policies also encompass the ISO 50001 Energy Management system, while LINK Sp. Z.o.o. and WSZL Kft.'s BILK H warehouse additionally also have the ISO 45001 Occupational Health & Safety Management system. The Group QMS Manager is responsible for the preparation and maintenance of integrated procedures, while the operation is the responsibility of the managers and directors of the respective business units. The policies are available in digital form to all relevant employees, and training is also provided on their content.

As part of its "Regulation on climate-related and environmental risks, as well as the enforcement of environmental sustainability aspects", Gránit Biztosító Zrt. has laid down its environmental, social, and governance (ESG) targets and

actions, as well as responses to assessed risks in the ESG strategy. The strategy also includes the Insurer's ESG vision and material topics to comply with the applicable legal provisions (Recommendation No. 12/2023. (XI.27.) of the Magyar Nemzeti Bank). The implementation of the strategy's content falls within the remit of the company's ESG officer, and the document is currently available to its internal stakeholders. In the development of the strategy, which was prepared based on the Green Recommendation published by the Magyar Nemzeti Bank for insurers, no external and internal stakeholders were involved.

Similarly to Gránit Biztosító Zrt., Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt. also prepared their risk assessment – which is part of the individual risk assessment – for the whole of the insurer in line with Recommendation No. 12/2023. (XI.27.) of the Magyar Nemzeti Bank. Currently, they only have an ESG strategy and do not yet have a separate policy related to climate change mitigation and adaptation.

## 2.2.6 [E1-3] ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

### The Company has defined sustainability as a strategic cornerstone.

The company's general business strategy extends to 2027, and the specifics related to sustainability are contained in the ESG strategy, which framework is presented in the **subchapter [SBM-1] Strategy, business model and value chain of Chapter 1.** The implementation of environmental actions involves various green infrastructure investments, reducing fuel usage (e.g., route optimisation, alternative powertrains and fuels, continuous replacement of diesel fleet, eco-driving), monitoring and improving energy efficiency (e.g., employee awareness, use of environmentally friendly energy sources such as solar panels, green real estate development), and decarbonisation tools.

One of the focus areas of the Company's sustainability strategy is the implementation of energy efficiency investment projects and measures, thus the Group has realised numerous energy efficiency

and energy reduction projects in 2024 to reduce the negative environmental impact of economic activities. Thanks to a 490 kVA small-scale solar power plant, renewable energy production increased this year, and an 80 kVA small-scale power plant constructed at the end of the 2024 financial year is also about to be commissioned. The Group will continue to enhance green energy use in 2025 by installing additional small-scale power plants or entering into Power Purchase Agreements (PPA). The Company is also exploring the possibility of direct electricity procurement from a solar park in Hungary, which would involve purchasing Guarantees of Origin. Plans also include synchronising other electricity use with solar generation, striving to use as much of the "green" energy produced by the Company as possible in everyday operations.

In real estate developments, it is fun-

damental to install solar panels on the roof for self-consumption, provided there are no technical obstacles. These efforts are supported by the close working relationship between the operator staff and the energy specialist. The Group considers it important to become increasingly independent from natural gas; therefore, more and more office buildings are being cooled and heated by air/water heat pumps or air/air (VRF) heat pumps, and modernising and increasing the efficiency of cooling and heating systems is a primary plan for the next year. The warehouse in Ecser, delivered in 2024, is already completely gas-independent.

The operation of the compressed air system in truck service requires significant electricity, and to ensure optimal operation, regular leakage tests are conducted with an external expert, where any detected faults are immediately repaired. The results of energy efficiency investments are supported by continuous moni-

toring and feedback.

Significant progress was made in the procurement of alternative powertrain vehicles in the 2024 financial year. The fleet was expanded with the following new vehicles:

- 2 LNG tractors;
- 2 electric tractors, one of which was leased by the Company between 03/07/2024 and 31/12/2024;
- 1 electric truck;
- 2 electric vans.

The expansion increased the number of alternative propulsion vehicles by 7 compared to 2023, when the total fleet consisted of 18 vehicles, representing an increase of approximately 40%.

The volume of intermodal transport increased by 23.3% in 2024, while revenue from this source showed a 22.7% increase. The Company also achieved significant progress in the use of sustainable fuels: the use of HVO100 increased 2.9 times compared to the previous year, which is an important step towards reducing the

carbon footprint.

In the **EU Taxonomy subchapter**, an explanation is provided regarding the financial background of aligned and eligible activities in both the transport, freight forwarding and logistics, and the insurance segments. In general, the implementation of measures is partly influenced by state grants and subsidies and significantly by the business needs of partners; currently, no specific cost elements have been allocated to the action items.

The Polish subsidiary, LINK Sp. z.o.o., supports the reduction of its environmental impact with several measures, such as:

- organising sustainability education campaigns to shape employee attitudes,
- monitoring and reduction efforts of utility and fuel consumption,
- gradually replacing the vehicle fleet (i.e., using newer, lower-emission vehicles),
- modernising lighting,
- regularly inspecting, adjusting, and

modernising (as necessary) the internal systems and equipment used for heating.

The monitoring of fuel used for operational purposes and the associated carbon dioxide emissions is carried out by the "EKO" team. Municipal and non-hazardous waste production, as well as water consumption, are also measured and examined. The **publicly available** ISO 14001 certificate confirms that the measures are appropriate and ongoing.

Waberer's Slovakia S.R.O. is committed to contributing to emission reduction in line with the Company's strategic pillars, and Waberer's Romania S.R.L. contributes to responsible energy use by installing LED lighting.

Gránit Biztosító Zrt. will fulfil its set actions by 2026 based on the Group ESG strategy, which relate to the focus areas of green services and emission reduction in the context of climate change.

STRATEGIC GOALS	PLANNED ACTIONS
<b>Green services</b>	
Energy efficiency product incentives	Considering energy efficiency investments in product development: developing coverage for natural disaster damage to solar panels and heat pumps, and natural disaster damage to garden vegetation
Storm damage prevention measures	Providing loss prevention recommendations and information to clients, email notifications before storm season
Digitalisation, paperless processes	Increasing the digital offer ratio of MTPL, CASCO, and home insurance
Precipitation intensity database	Modelling meteorological phenomena related to climatic changes, developing risk forecasting
<b>Reducing emissions</b>	
Energy and cost-effective operation	Optimisation of workflows, roles, and work tools
CO2 emission measurement/reduction	Scope 1, Scope 2 carbon footprint calculation, CO2 compensation through tree planting
Energy-efficient office	Increasing the energy efficiency of office buildings: insulation, shading, heating and lighting modernisation
Company electromobility	Reducing emissions of company cars, gradual replacement with low CO2 emission vehicles
Green investments	Review of investment policy, assessment of investment opportunities in green bonds

In the framework of addressing deficiencies identified in the self-assessment survey related to Recommendation No. 12/2023. (XI.27.) of the Magyar Nemzeti Bank, the Insurer has already implemented measures by the end of the 2024 financial year, such as implementing processes supporting the development of sustainability-related pricing strategies and product incentives, assessing and addressing ESG-related data gaps, and integrating identified climate change-related risks and opportunities into the Company's

business strategy. Gránit Biztosító strives for continuous development in this area. Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt. have laid down the management of their climate risks and related directions in the ESG strategy, without specifying a timeframe. The renewal of the general business strategy is underway, with sustainability as one of its main pillars, thus they are planning to integrate ESG actions more broadly into operations. Significant actions related to risks include the establishment of a sustainability lim-

it system for investments, as described in **subchapter [G-Entity-specific] Risk management of Chapter 4**, with which the Posta Insurers have begun to minimise investments with negative impacts on the environment and society.

There were no actual and direct victims of the Group's environmental impacts in 2024. If there were any, affected parties may report this using the contact details available on the Company's website or via the complaints reporting interface, which is investigated by a dedicated committee.

## 2.2.7 [E1-4] TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Strategic goals	Development of green services
	Increasing the share of rail and intermodal transport
	Increasing the use of alternative powertrains
	Increasing the use of alternative fuels
	Developing sustainable storage technology
	Greening the insurance segment's investment portfolio, introducing environmental product incentives (Gránit Biztosító Zrt.)
	Reducing emissions
	Formulation and publication of emission reduction targets
	Increasing green infrastructure investment projects (Gránit Biztosító Zrt.)
	Reducing fuel use
Increasing energy and cost efficiency measures	

The Company has set its strategic goals along ESG dimensions for the period 2024-2026, to which actions and performance indicators have been assigned. The Company's ESG Strategy, currently being revised, includes various actions and target values, key performance indicators in topics affecting material impacts and risks. A total of 25 strategic goals have been formulated, of which 9 specifically relate to climate change. However, most strategic goals currently lack assigned quantitative performance indicators, affecting the entire Group.

Internal stakeholders participated in the strategy formulation process, which was developed jointly with area leaders. They also laid down the objectives, primarily concerning the development of green services and emission reduction concerning the environment, which are summarised in the table below.

In the case of Gránit Biztosító Zrt., the Group ESG strategy-derived, unique

ESG actions also include main designated targets and plans (along the focus areas addressed in the previous **[E1-3] Actions and resources in relation to climate change policies subchapter**), which also relate to climate change mitigation and adaptation for the 2024-2027 period. The management of Gránit Biztosító Zrt. participated directly in the process.

The foreign subsidiaries (Waberer's Romania S.R.L., Waberer's Slovakia S.R.O., LINK Sp. z.o.o.), as well as Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt., have not set emission reduction or other targets related to mitigating climate change and necessary for adaptation, and have not begun efficiency reassessment due to their minimal policies and measures. In light of the main activities of Posta Insurers (providing insurance services), a certain reduction in fossil energy sources used by them may typically appear (e.g., optimisation of the vehicle fleet, reduction of office energy use), the

precise definition of which may occur in the near future.

For the targets set for the whole of the Company, it can be established that they were primarily determined considering past trends in 2023, yet not all have been assigned quantitative performance indicators or measurable target levels. During the development of the 2025 strategy, which includes the integration of the double materiality assessment, stakeholder feedback conducted within this framework, as well as employee satisfaction and customer satisfaction survey results will also be incorporated. A future goal is to replace projections based on historical data with scientifically substantiated targets for carbon goals.

The calculation related to determining GHG emissions was based on the Greenhouse Gas (GHG) Protocol Scope 1, Scope 2, and Scope 3 methodology. The Company's carbon footprint calculation was consolidated at the Waberer's Internation-

al Nyrt. level, with emissions calculations broken down along the three business segments. The current targets are not scientifically substantiated as yet and cannot be reconciled with limiting global warming

to 1.5 °C, the Paris Agreement, yet the transition targets are part of the Company's strategy. From the coming years, the Group plans to define and monitor carbon dioxide emission performance based on

the SBTi (Science Based Targets initiative). These targets will be set by the 2027 financial year at the latest.

## 2.3 [E1-5] ENERGY CONSUMPTION AND MIX

The Group's total energy consumption consists of fossil, nuclear, and renewable sources, its scope is consistent with the emissions considered in Scope 1 and 2 calculations.

The Company used estimates for the data of the 12th month, as energy bills had not yet been received in all cases by then.

In fossil energy consumption, it is primarily the fuel consumption (diesel, petrol) resulting from Waberer's transport, freight forwarding, and logistics activities that has the greatest significance alongside natural gas and electricity consump-

tion, but in Hungary, LNG also appears as another fossil source consumption.

Nuclear energy is the electricity purchased from nuclear energy production, calculated based on the energy mixes of the respective countries. The diversity of the energy mixes of the countries is shown by the fact that in Romania, significantly less fossil energy is used, while

the subsidiary's total consumption is also considerably lower.

The consumption of renewable energy sources in Hungary is linked to the use of HVO100 fuel, while in Romania, it is associated with the use of pellets for heating. Self-produced renewable energy is currently only relevant in Hungary, thanks to the increasingly widespread installation of solar panels.

The direct energy consumption of the buildings and vehicles in the Insurers' own use is negligible, yet their data have been separately indicated.

2024	HUNGARIAN TRANSPORT, FREIGHT FORWARDING, AND LOGISTICS SUBSIDIARIES	WABERER'S ROMANIA S.R.L.	WABERER'S SLOVAKIA S.R.O.	LINK SP. Z.O.O.	WABERER'S TRANSPORT, FREIGHT FORWARDING, LOGISTICS BUSINESS SEGMENT	GRÁNIT BIZTOSÍTÓ ZRT.	MAGYAR POSTA INSURERS
Fuel consumption from coal and coal products (MWh) <sup>8</sup>	0	0	0	0	0	n/a	n/a
Fuel consumption from crude oil and petroleum products (MWh) <sup>12</sup>	777,843	25	146	0 <sup>9</sup>	778,014	n/a	n/a
Fuel consumption from natural gas (MWh) <sup>12</sup>	2,821	0	202	95	3,118	n/a	n/a
Fuel consumption from other fossil sources (MWh) <sup>12</sup>	5,476	0	0	0	5,476	n/a	n/a
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources (MWh) <sup>12</sup>	3,913	24	68	173	4,178	n/a	n/a
Total fossil energy consumption (MWh)	790,053	49	416	268	790,786	325	40
Share of fossil sources in total energy consumption (%)	98.1%	11.7%	85.4%	89.7%	98.1%	85.8%	83.3%
Consumption from nuclear sources (MWh)	3,618	18	65	1	3,702	35	5

<sup>8</sup> Waberer's International Nyrt. companies operate in high climate impact sectors (H49.2 Freight rail transport; H49.41 Freight transport by road; H52.1 Warehousing and storage; G45.1 Sale of motor vehicles; G45.2 Maintenance and repair of motor vehicles; L68.1 Buying and selling of own real estate; L68.2 Renting and operating of own or leased real estate), thus the Group calculated its total energy intensity based on the total net revenue and total energy consumption from activities conducted in high climate impact sectors.

<sup>9</sup> The figures of LINK Sp. z.o.o are already included in the Hungarian transport, freight forwarding, and logistics subsidiary figures.

Share of consumption from nuclear sources in total energy consumption (%)	0.5%	4.3%	13.3%	0.3%	0.5%	9.3%	10.4%
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	8,365	306	0	0	8,671	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,935	46	7	30	2,018	19	3
Consumption of self-generated non-fuel renewable energy (MWh)	1,112	0	0	0	1,112	0	0
Total renewable energy consumption (MWh)	11,412	352	7	30	11,801	19	3
Share of renewable sources in total energy consumption (%)	1.4%	84.0%	1.4%	10%	1.5%	5.0%	6.03%
Total energy consumption (MWh)	805,083	419	488	299	806,289	379	48
Energy intensity based on net revenue from activities in high climate impact sectors <sup>12</sup> (MWh/EUR thousand) <sup>10</sup>	-	-	-	-	1.2	n/a	n/a

### 2.3.1 [E1-6] GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

The Company's strategic goal is to reduce greenhouse gas emissions, a key element of which is the continuous monitoring and optimisation of fuel use, which accounts for a significant proportion of total GHG emissions.

GHG emissions are also considered high on a global scale due to industry and technological characteristics – the response to this is a fleet consciously kept

young, strict monitoring of consumption, use of alternative powertrains and fuels, and precise route planning. The Company's calculation methodology for Scope 1,

2, and 3 GHG emissions is based on the Greenhouse Gas (GHG) Protocol, broken down by business segments: international transport and freight forwarding, regional contract logistics, and insurance segment. The carbon footprint calculation was performed at the level of Waberer's International Nyrt., but data was collected at the subsidiary level. The GHG emissions calculation includes all companies

<sup>10</sup> The amount of net revenue contained in the consolidated financial statements was applied for the calculation of energy intensity.

consolidated in the Sustainability Report, however, for the Waberer's Network Kft. subsidiary, it was not possible to fully calculate with primary data, i.e., consumption values related to road activities, thus an estimate was made (using kilometre data calculated based on location codes of loading and unloading sites and average consumption). The same also applied to certain parts of the entire Group's Scope 3 emissions (for example, assuming the average consumption of transport subcontractors and the shortest route), as well as the Scope 2 data for the 12th month. The GHG calculation is continuously expanding to cover the entire Group, as part of which the data of the Romanian and Slovak subsidiaries were integrated in 2024.

The direct, Scope 1 emissions from emissions owned and controlled by the company were summarised from natural gas consumption in self-owned properties and fuel consumption of self-owned and leased trucks and vehicles, using average, country-specific emission factors (Hungarian Energy and Public Utility Regulatory Authority, HEPURA) for the former, and DEFRA emission factors for fuel consumption. The EU ETS (Emission Trading System) currently does not cover logistics companies, thus in this the Company mainly conducts the sale of quotas from negligible fuel sales, which is an immate-

rial amount, not reaching the materiality threshold.

Indirect Scope 2 emissions from the production of energy purchased from a utility provider cover the electricity consumption of self-owned and leased properties, as well as the natural gas used in boilers operated by the lessor in non-self-owned properties. For self-owned and leased properties, the Company follows a location-based Scope 2 calculation; currently, a market-based approach is not possible as the necessary emission factors cannot be provided by the suppliers to the Company. Energy consumption bills are received by the Company's staff with several months' delay, meaning that the data for November and December are calculated on a location basis based on interpolation and average, country-specific emission factors, using data provided by DEFRA (Department for Environment, Food & Rural Affairs). Currently, no contractual assets are used at the Company.

The Insurers' Scope 1 and Scope 2 emissions cover the natural gas and electricity consumption from the operation of central offices, as well as emissions from the fuel consumption of service – self-owned – vehicles. However, for Magyar Posta Insurers, the amount of Scope 1 emissions from self-owned vehicles is not material, and emissions from the vehicle

use of external claims adjusters are also outside the scope of the calculation. The emission factors and calculation methodology are consistent with the processes previously outlined by the Company, and their values are presented in aggregate in the table showing Scope 1,2 emissions.

Within the Scope 1 category, biogenic emissions also arose due to the Company's activities and GHG reduction measures, which result from the use of HVO 100 fuel at Waberer's International Nyrt. Such emissions do not materialise at the Insurers.

In determining the Scope 3 inventory, the Company excluded most categories based on relevance and materiality level, and a benchmark analysis was conducted to develop the set of criteria. Subcontractors and freight forwarding partners represent a significant amount, meaning emissions related to fuel extraction, transport subcontractors, ferry companies, railway companies, investments (PSP, MDI, as material emitters). Thus, in the categories of fuel and energy-related activities (3), downstream transportation (9), and investments (15), emissions from large amounts of purchased fuel, subcontractor involvement, and associated companies were calculated.

SCOPE 3 CATEGORY	RELEVANCE ASSESSMENT
1. Purchased goods and services	This category includes all products and services purchased by the Company for its daily operations that do not qualify as tangible assets (e.g., tyres, parts, office equipment). Emissions related to these procurements are negligible compared to the total emission value and have no significant impact on the carbon footprint, therefore they are not considered in the calculations.
2. Capital goods	This category includes emissions related to the production of tangible assets. This includes long-term use assets that appear on the Company's balance sheet and are accounted for as capital expenditure (CapEx), such as trucks, trailers, warehouse technologies, and other long-term investments related to the fleet. The current methodology does not yet cover this category.
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	Fuel and energy-related activities include well-to-tank emissions related to the Company's own fleet. Fuel is of paramount importance to the Company's operations and is used in significant quantities, thus all emissions related to the production of the given fuel type are clearly considered material.
4. Upstream transportation and distribution	This category includes emissions from transport tasks and external logistics services (such as rail and sea transport) that are related to the upstream supply chain, covering incoming shipments to the Company, not traffic directed towards customers. During the reporting period, no separate data is available on the emissions of the mentioned types of incoming shipments, so they are not included in the report.
5. Waste generated in operations	This category covers emissions from the disposal and recycling of waste generated during transport and warehousing activities, such as packaging materials, tyres, and oil filters. However, their quantity is negligible compared to total emissions, so these were not included in the calculations for 2024.
6. Business traveling	Emissions arising from employees' business travel, including trips by plane, train, or other means of transport (in addition to commuting), which the Company currently does not consider in the Scope 3 calculation as their quantity is immaterial.

<b>7. Employee commuting</b>	Emissions related to employee commuting, regardless of whether they use their own vehicle or public transport, which the Company currently does not consider in the Scope 3 calculation as their quantity is immaterial.
<b>8. Upstream leased assets</b>	Emissions from leased vehicles, warehouses, and offices are presented in Scope 1 and Scope 2 categories, as they are directly related to the Company's operations.
<b>9. Downstream transportation</b>	The Company considers emissions in the downstream transportation and distribution, category 9, for transport operations that are carried out not with its own fleet but with external logistics partners. Their significance is not negligible, as they are realised as part of core services. Fuel consumption and the related emissions are also considerable in this case.
<b>10. Processing of sold products</b>	The Scope 3 category would be applicable for products, but it is not relevant for the services provided by the Company.
<b>11. Use of sold products</b>	If the Company sells or leases transport equipment (such as vehicles, pallets, containers), emissions from fuel and energy consumption throughout their entire lifecycle would fall into this category. Currently, these emissions have not been summarised, but in the future, the Group will examine materiality in the case of larger sales volumes.
<b>12. End-of-life treatment of sold products</b>	Emissions from the waste management of used vehicles, parts, and packaging materials will be relevant in the future, but they have not yet been covered in the reporting period.
<b>13. Downstream leased assets</b>	Emissions from the operation of vehicles and other logistics equipment leased to customers do not fall within the Scope 3 boundary, as they are not applicable to the Companies' services. They have a leased property in Romania, but its emissions are negligible and immaterial, and was included in Scope 2.
<b>14. Franchises</b>	If the Company were to operate a franchise system (e.g., subcontractor transport partners working under their own brand name), these emissions would need to be presented in this category. However, the Group currently does not operate such a system, so these emissions do not appear in the Scope 3 calculation.
<b>15. Investments</b>	In the case of investments, the PSP (Petrolsped) and MDI groups, as associated companies, and thus the emissions of the value chain participants, are included, over which the Company does not exercise direct operational control, but through ownership stakes, it indirectly contributes to their operations. These emissions are significant, as it is important for the achievement of sustainability goals that the carbon intensity of investments is also monitored. Emissions generated by financial investments contribute to the total carbon footprint, and these values are considered material, currently based on estimates. However, more accurate data will be available in the coming years.

Regarding the methodologies of the material categories of Scope 3, the Company estimated emissions for fuel and energy-related activities based on purchased fuel consumption, and for downstream transportation, based on the average consumption of vehicle categories used and compatible DEFRA emission factors. Estimation was applied for December's building energy consumption and subcontractors' average consumption.

Gránit Biztosító Zrt. and Magyar Posta Insurers do not yet have a unified and regulated methodology available for the extension of Scope 3, thus within the framework of these calculations, the insurance sector does not form part of Scope 3 emissions. For insurers, given the industry, the category 15 Investments would be the relevant Scope 3 emission value. The Company reviewed the proportion of investments occurring at insurers and the related expected emissions along the evaluation of its total investments: in the

case of Gránit Biztosító, these emissions do not form a relevant proportion. In the case of Magyar Posta Insurers, considering that they were included at the end of the business period, their investment values need to be evaluated proportionally for the partial period in terms of assessing GHG emissions as flow type, based on which Magyar Posta Insurers' investments and related emissions also represent a smaller proportion compared to the total investments of the Group, thus they were not included in the Scope 3, Category 15 calculation scope this year. Furthermore, there is currently no unified and regulated methodology, and reliable, accurate data available for calculating the Insurers' emissions. Conducting an estimate would have required a significant resource investment from the Company, and there would have been considerable uncertainty regarding the results. In light of the above, the Group decided that next year, with the completion of the full integration of Mag-

yar Posta Insurers and the development of a unified calculation methodology, the Company will conduct a transparent estimate regarding the Insurers' emissions belonging to Scope 3, Category 15.

The Company's Scope 1, 2, and 3 emissions are contained in the following table:

2024	WABERER'S GROUP
<b>Gross Scope 1 GHG emissions (tCO<sub>2</sub>eq)<sup>11</sup></b>	196394
Percentage of Scope 1 GHG emissions from regulated emissions trading systems (%)	-
Biogenic – GHG emissions not included in Scope 1	n/a
<b>Gross Scope 2 location-based GHG emissions (tCO<sub>2</sub>eq)<sup>12</sup></b>	3940
<b>Gross Scope 2 market-based GHG emissions (tCO<sub>2</sub>eq)</b>	-
Biogenic – GHG emissions not included in Scope 2	n/a
<b>Gross Scope 3 GHG emissions (tCO<sub>2</sub>eq)<sup>13</sup></b>	158415
1. Purchased goods and services	n/a
[Optional sub-category: Cloud computing and data centre services]	n/a
2. Capital goods	n/a
<b>3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)</b>	51386
4. Upstream transportation and distribution	n/a
5. Waste generated in operations	n/a
6. Business traveling	n/a
7. Employee commuting	n/a
8. Upstream leased assets	n/a
<b>9. Downstream transportation</b>	102606
10. Processing of sold products	n/a
11. Use of sold products	n/a
12. End-of-life treatment of sold products	n/a
13. Downstream leased assets	n/a
14. Franchises	n/a
<b>15. Investments</b>	4,423
Biogenic – GHG emissions not included in Scope 3	n/a
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>eq)</b>	358749
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>eq)</b>	-
<b>Total GHG emissions per net revenue (location-based) (tCO<sub>2</sub>eq /EUR THOUSAND)<sup>14</sup></b>	0.5
<b>Total GHG emissions per net revenue (market-based) (tCO<sub>2</sub>eq /EUR THOUSAND)</b>	-

The Group's value chain has undergone significant changes since the first ESG strategy and report, with an expansion in insurance and real estate development potential, and an increasing reliance on rail services.

In the Company's 2024 business year, the acquisition of Magyar Posta Insurers, which was realised at the very end of November, brought significant change

to the group structure. However, this did not result in significant GHG load overall, especially as it only meant the month of December as part of the Company. Nevertheless, the subsidiaries were included in the carbon footprint calculation for the period following their joining the Group, except for Scope 3, Category 15, which the Company will extend to them in the next reporting period as outlined in the

Scope 3 inventory table. The previous years do not form a representative basis for the whole of the Company, and future comparisons will be made to the 2024 status.

11 GHGs included in the calculation: R1234YF, R134A, CO<sub>2</sub>

12 GHGs included in the calculation: CO<sub>2</sub>

13 GHGs included in the calculation: CO<sub>2</sub>

14 The amount of net revenue contained in the consolidated financial statements was applied for the calculation of GHG intensity. The financial data of Magyar Posta Insurers have not yet been consolidated.



# SOCIAL INFORMATION

## SOCIAL INFORMATION

The Company's activities have significant social impacts, affecting its employees, partners, clients, and the wider communities.

The Company strives to ensure a sustainable and safe working environment, while also facing labour market challenges and risks, such as labour shortages

or achieving equal opportunities. Collaboration with the stakeholder groups not only offers an opportunity to strengthen social values but is also essential for en-

sureing long-term operations. The purpose of this chapter is to present the measures by which the Company seeks to manage social risks, leverage opportunities, and achieve measurable positive impacts in the field of sustainability.

### 3.1 [S1] OWN WORKFORCE

The Company's employee base includes both own and leased workforce.

This chapter exclusively presents the impacts, risks, opportunities, as well as the policies, measures, and objectives relat-

ed to the Company's own workforce. The Company's goal is to provide a fair and safe working environment for all employ-

ees, while recognising that different forms of employment come with different challenges and risks. Below are the measures and initiatives by which the Company attempts to respond to emerging difficulties and the diverse needs of different employee groups.

#### 3.1.1 [SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL(S)

THE COMPANY'S EMPLOYEES CAN BE CLASSIFIED INTO THREE MAIN GROUPS BASED ON THEIR ACTIVITIES, WHICH APPEAR DIFFERENTLY ACROSS SUBSIDIARIES:

- truck drivers,
- blue-collar workers,
- white-collar workers.

Own employees by type of work performed in the Company's subsidiaries:

SUBSIDIARY	TYPE OF WORK PERFORMED
Waberer's International Nyrt.	Truck drivers (Hungarian and foreign employees in international transport), blue-collar workers (mainly skilled workers in technical fields), white-collar workforce
Waberer's Network Kft.	White-collar workers
Nexways Cargo Kft.	Truck drivers (Hungarian and foreign employees in international transport)
Delta-Rent Kft.	White-collar workers
All in One Transport Kft.	White-collar workers, truck drivers
WSZL Kft., WSZL Autómotív Kft.	Truck drivers (Hungarian and foreign employees in transport), warehouse logistics workers (Hungarian and foreign), white-collar workforce,
Rapid Teherautó Szerviz Kft.	White-collar and skilled blue-collar workers (mechanics)
Waberer's Slovakia S.R.O.	White-collar workers, blue-collar (warehouse logistics) workers
Waberer's Romania S.R.L.	White-collar workers
LINK Sp. z o.o.	White-collar workers, truck drivers
Gránit Biztosító Zrt.	White-collar workers
Magyar Posta Biztosító Zrt.	White-collar workers
Magyar Posta Életbiztosító Zrt.	White-collar workers

Based on the results of the double materiality assessment, the impacts related to employees are widely prevalent and can be considered systemic within the Group. During the assessment, the Company considered all individuals belonging to its own workforce, ensuring a comprehensive evaluation.

In the Introduction chapter, the sub-chapter entitled **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)** presented the impacts on the Company's own workforce and the IROs arising from dependencies related to them. The Company presented the material risks and opportunities arising from the impacts on its own workforce and the dependencies related to them, including those that are specific to certain groups and do not extend to the entire workforce.

The Company's ESG Strategy contains the regulations and measures aimed at managing the impacts, risks, and opportunities related to its own workforce. A significant portion of the topics identified during the double materiality assessment conducted in 2024 can be linked to the Company's previously established regulations and policies. Based on the results of the double materiality assessment, the ESG Strategy and its social pillar will be reviewed in 2025.

The Company regularly maintains contact with employees through multiple platforms. The aim of the communication is to monitor and continuously improve employee satisfaction. To this end, they conduct a satisfaction survey every two years and run a voluntary sponsor group of employees to promote points for development and progress. Effective employee relations are facilitated by trade union representation and regular performance appraisal discussions with employees.

LINK Sp. z.o.o. is currently not covered by the corporate group ESG strategy, but the Company plans to extend it in 2025.

The most important strategic direction is to attract skilled workforce, whose competencies are continuously developed through various training programmes. LINK has also identified and monitors risks and opportunities to achieve corporate goals, with employees being key players. Therefore, they monitor employee motivation, commitment, and well-being. A key element of the strategy is finding and retaining skilled workforce, for which they

provide continuous training and development programmes for employees, tracking their completion.

The Magyar Posta Insurers are currently not covered by the ESG Strategy, as they joined the Company at the end of 2024. As a consequence of the acquisition process, in 2025, as part of the integration process, the Magyar Posta Insurers will also be integrated into the Company's corporate group action plan, namely the Waberer's Group ESG Strategy.

The Magyar Posta Insurers did not have a workforce-related action plan in place for 2024. Due to the specific characteristics of the insurance industry, maintaining competitive pay and work-life balance is of paramount importance for attracting and retaining skilled workforce.

The Company does not yet have a transition plan, so the effects of the transition plan on the Group's employees are not yet known. The transition plan is detailed in the Environmental chapter, in sub-chapter **[E1-1] Transition plan for climate change mitigation**, and further transition plan objectives in sub-chapter **[E1-4] Targets related to climate change mitigation and adaptation**.

In the Company's operations, forced labour and child labour are excluded, as these are not only contrary to the Company's principles but are also expressly prohibited by the relevant human rights regulations of the European Union. The Code of Ethics explicitly prohibits these forms of employment, against which the Company exercises zero tolerance.

The Company has not yet developed a specific mechanism for identifying and managing vulnerable groups. The Company operates in accordance with the regulations of the member states of the European Union and the European Economic Area, complying with all national and international labour law regulations.

## 3.1.2 [S1-1] POLICIES RELATED TO OWN WORKFORCE

ESRS DISCLOSURE REQUIREMENT	MATERIAL SUSTAINABILITY TOPICS	RELATED POLICIES	SCOPE OF POLICIES (INDICATION OF DEVIATION FROM GROUP SCOPE) <sup>15</sup>
S1 – Own workforce	Working conditions Equal treatment and equal opportunities	Code of Ethics	It does not apply to the following subsidiaries: All in One Transport Kft. Waberer's Slovakia S.R.O. Gránit Biztosító Zrt.
		Code of Ethics	Gránit Biztosító Zrt. has its own Code of Ethics
		Occupational health and safety regulations	Waberer's International Nyrt. occupational safety policy Separate occupational health and safety regulations, which differ slightly in content due to different activities, apply to the following subsidiaries: Waberer's International Nyrt. Nexways Cargo Kft. Rapid Teherautó Szerviz Kft. Waberer's Network Kft. WSZL Kft.
		Training policy	The Company's policy
		Home Office Policy	The Company's regulations
		Remuneration policy	The remuneration policy applies to Waberer's International Nyrt.
		Gránit Biztosító Zrt.: Remuneration policy	Gránit Biztosító Zrt. has its own remuneration policy
		Organisational and Operational Regulations	It applies to all subsidiaries of the Company.
		Organisational and Operational Regulations	Gránit Biztosító Zrt.'s policy
		Whistle-blowing system	Employees of all subsidiaries of the Company may use it
		Complaints reporting	Gránit Biztosító Zrt.'s own complaints reporting platform
		Recruitment Policy	LINK Sp. z.o.o.'s recruitment policy
		Labour Policy and its annex	LINK Sp. z.o.o.'s policy
		Board Policy	LINK Sp. z.o.o.'s policy
		Anti-discrimination rules of procedure	LINK Sp. z.o.o.'s policy on equal treatment
		Code of Conduct	Magyar Posta Insurers policy
		Training Policy	Magyar Posta Insurers regulations
Remuneration and Incentive System Policy	Magyar Posta Insurers regulations		
External and Internal Fraud Policy	Magyar Posta Insurers regulations		

<sup>15</sup> If the policy applies to the Company, it does not include the Magyar Posta Insurers, as they were not members of the Company for the majority of the 2024 financial year.

## Within the Company, the highest executive level responsible for the implementation of policies is the Company's Chairman-CEO.

In the Introduction chapter, in the sub-chapter entitled **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)**, the appropriate recording of working conditions appears as the Company's positive impact on employees among the material sustainability topics related to own workforce.

The Company's policies applied to manage impacts, risks, and opportunities related to own workforce are presented in the following chapter. In 2025, the topics identified along the impacts, risks, and opportunities during the materiality assessment will be reviewed to determine where existing policies need clarification or new policies need to be developed.

All employee-related policies are primarily based on the Organisational and Operational Regulations, which also underpin the equally important Code of Ethics. Gránit Biztosító has its own Organisational and Operational Regulations and Code of Ethics because the characteristics of its activities significantly differ from those of other members of Waberer's Group (except for Magyar Posta Insurers). Due to the different industry and commercial practices, it is necessary to separately define the expected behaviours and principles.

LINK Sp. z.o.o. is the only foreign subsidiary with significant workforce, thus justifying some local deviations from the Group level in their case. Therefore, for the Polish subsidiary LINK Sp. z.o.o., the Recruitment Policy, Code of Ethics, ISO standards, and Board Policy regulate the management of material impacts, risks, and opportunities related to its own workforce. For the Company, it is essential to ensure that its employees work in safe, regulated, and equal conditions, providing a safe working environment and ensuring employee well-being. The Company's policies are intended to provide a regulated background for provisions affecting employees' daily lives.

The Company as a whole currently does not have a health and safety management system. More information is available in the chapter **[S1-14] Health and safety metrics**. The scope of the Company's occupational health and safety policy extends to defining the conditions

for safe and healthy work, the methods of ensuring such conditions, the personal impact, rights and responsibilities, and the rules of procedure of occupational safety procedures. Its territorial scope covers the places of work, work processes, work performance, and other activities within the operational and activity scope of Waberer's Group – whether under its management, lease, or use.

### ORGANISATIONAL AND OPERATIONAL REGULATIONS

The Organisational and Operational Regulations set out the rules of work performance. The most important topics affected by the policy concerning work performance include working hours, work schedule, job description, conflict of interest, guidelines on work discipline, labour accountability and adverse legal consequences, general principles of financial accountability, employee reports, and employee representation.

### CODE OF ETHICS

One of the most important policies concerning employees is the Code of Ethics. Every employee to whom the policy applies must become familiar with the content of the Code of Ethics upon commencing employment and confirm their understanding of the Company's ethical standards by completing a test in the training system. Every year, they must again demonstrate their knowledge of the rules, which the Company's HR function monitors and reminds employees to complete. The Company's Code of Ethics includes commitments related to the respect of human rights. Stakeholders were not directly involved in the development of the Code of Ethics, however, the policy was designed to appropriately regulate the principles of conduct to be observed by the Company's leaders, employees, and business partners in relations with business and other external stakeholders and in internal work relationships from an ethical perspective.

Specific commitments to respect fundamental human rights in the Company's Code of Ethics include, among others:

- the prohibition of child labour, forced

labour of any kind, prison labour, slave labour and involuntary labour,

- the right to equal treatment, freedom of conscience, and personal freedom,
- the right to physical integrity and health,
- the right to honour, human dignity, name, and good reputation,
- the right to one's image and voice recording, protection of secrets, and personal data,
- respect for the right to reverence of the deceased,
- ensuring a healthy, safe, and environmentally-friendly workplace and working conditions,
- respect for employees' privacy,
- provision of working time records and leave,
- freedom of expression,
- freedom of trade union advocacy.

The Company supports work-life balance – including the option of working from home – and recognises employees' rights to rest, recreation, and holidays.

The principles in the Company's Code of Ethics are currently not explicitly aligned with the human rights guidelines formulated for businesses by the United Nations (UN), the International Labour Organisation (ILO), and the Organisation for Economic Co-operation and Development (OECD).

The Code of Ethics is available on the Waberer's International Nyrt. [website](#) for external and internal users, and separately on the intranet for its own employees.

### WHISTLE-BLOWING SYSTEM

The appropriate internal functioning of the Company is ensured by the whistle-blowing system based on the Code of Ethics, which provides the opportunity for employees and external stakeholders to report any potential violations anonymously. The Group's Supervisory Board is regularly informed about whistle-blowing cases and their consequences and experiences. These processes are governed by the CEO Group-Wide Order No. 29/2022.

In the case of LINK Sp. z.o.o., the details of cooperation with employees, commitments, and respect for human rights are defined by the internal document entitled Appendix to the Labour Policy and the Anti-Discrimination Rules of Procedure. In the case of LINK Sp. z.o.o., employees and external stakeholders can also report any

violations on a separate platform on the website, intranet, and by phone – through platforms specifically reserved for LINK Sp. z.o.o. The company directly informs the Group-level function about the received reports, which are mostly handled locally.

## DIVERSITY

The Company is committed to creating diversity and maintaining equality. The Company has an Equal Opportunities Plan<sup>16</sup> in place. The equal opportunities plan was created to promote equal opportunities for staff with protected characteristics and lays the foundation for non-discriminatory treatment and, in certain cases, the necessary degree of positive discrimination (for example, considering family obligations). Professional knowledge and qualifications are the most important criteria for selecting and promoting employees, and the Company's recruitment and promotion decisions are not influenced by ethnicity, nationality, religion, gender, or age.

"CEO Group-Wide Order No. 12/2022 – Subject: The selection and recruitment process for white-collar and blue-collar staff (applying for non-truck driver positions)" contains specific measures stipulated based on the equity principles described in the Code of Ethics, applicable to the Company's subsidiaries to which the Code of Ethics applies (Gránit Biztosító has a separate Code of Ethics). Gránit Biztosító's Remuneration Policy includes the requirement for equal treatment, the prohibition of discrimination, and impartiality in employee remuneration.

In the case of LINK Sp. z.o.o., the Labour Policy, the Labour Code, and the document entitled Appendix to the Labour Policy and the Anti-Discrimination Rules of Procedure contain detailed rules against discrimination. Anonymous complaints reporting is also made available for LINK Sp. z.o.o. employees.

## TRAINING POLICY

The positive impact of training and skill development on employees is reflected in career planning. For white-collar and blue-collar workers,, as well as international truck drivers, the Company has implemented an annual performance as-

essment and monitors the achievement of annual targets, providing employees with development opportunities. The 2024 training policy provides a comprehensive approach, including mandatory annual training supporting legal and ethical compliance and measuring their effectiveness. These trainings cover workplace legal requirements and expectations for creating a non-discriminatory and ethical work environment. As part of the training programme, the Company supports employees' career planning and professional development, whether it involves the development of hard or soft skills. The Company places special emphasis on professional further training, within which there is an opportunity to pursue studies related to becoming a Business Administration Clerk, Logistics Technician, IT System and Application Operator Technician, and Alternative Propulsion Technician.

The trainings included communication workshops aimed at developing effective interactions, as well as self-awareness and motivational workshops that support personal development and workplace commitment. Additionally, employees could enhance their leadership skills, cooperation efficiency, and sales capabilities through targeted training. Within the framework of the mentoring programme, the Company provides 'train the trainer' training for mentors, facilitating effective knowledge transfer and the success of the mentoring process. Truck drivers can learn a more sustainable, environmentally-conscious driving technique during ECO Driving training, contributing to the Company's environmental objectives.

The Company, through its driving school, provides Driver Qualification Card (GKI) renewal training in Hungarian, Ukrainian, Serbian, and English, supporting the professional preparedness of international employees. The aim of the education and training system is to increase the efficiency of meeting job-related expectations by providing online training and offering flexible and accessible learning opportunities for the Company's employees.

The appropriate internal functioning of Magyar Posta Insurers is ensured by the Code of Conduct and the whistle-blowing system. In the case of Magyar Posta Insurers, the main policies for employees in 2024 include the Code of Conduct, the

Training Policy, the Remuneration and Incentive System Policy, and the External and Internal Fraud Policy. The highest executive level responsible for the implementation of the policy and regulations is the CEO of Magyar Posta Insurers, or the Board of Directors or Management.

The Code of Conduct of Magyar Posta Insurers states that the companies are committed to the principle of equal treatment for equal work. The content of the Code of Conduct is identical to the Waberer's Group Code of Ethics, and during integration, the Group-level policy is expected to be extended. Magyar Posta Insurers have not yet defined specific measures or practical steps for eliminating discrimination.

The Remuneration and Incentive System Policy lays down the conditions and form of compensation beyond the base salary for employees, and the operation of the formalised performance assessment bonus system. The External and Internal Fraud Policy informs stakeholders about the use of the internal whistle-blowing channel reserved for employees of Magyar Posta Insurers.

<sup>16</sup> The Equal Opportunities Plan was established based on the provisions of Section 21 of Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities, and Act I of 2012 on the Labour Code.

### 3.1.3 [S1-2] PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

Relevant IROs from the sub-chapter entitled **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)** of the Introduction chapter: social dialogue – platforms for employee feedback and social dialogue – positive impacts of trade unions on employees.

As part of the double materiality assessment, the Company also sought validation from the employee group on material topics, with employees surveyed anonymously via a questionnaire. The detailed process is contained in the Introduction chapter, in the sub-chapter entitled **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)**.

At the Company, the highest level executive role responsible for employee cooperation is held by the Group's HR director. The Group HR director of the Company is responsible for the creation and renewal of the human resources strategy of the Company and its subsidiaries, addressing challenges affecting the human area, and developing the Company's personnel. The management and control of internal communication on human issues also fall under the responsibility of the HR Director. Certain subsidiaries (WSZL Kft., WSZL Automotív Kft., LINK Sp. z.o.o.) have local HR managers, while the group HR Director is responsible for the other subsidiaries.

The general aim of the Company's communication with employees is to monitor and continuously improve employee satisfaction. To this end, the Company conducts a satisfaction survey every two years. The 2023 satisfaction survey was conducted with the help of an independent consulting party, using online and offline questionnaires to anonymously assess employee experiences, and the results were processed through a leadership feedback workshop. The Company will organise the next satisfaction survey in 2025, which will also serve as a feedback measure regarding the actions taken since then. The Company's goal is to extend the survey as widely as possible within the Group. In the first employee satisfaction survey, the white-collar and blue-collar employees of Waberer's Inter-

national Nyrt., WSZL Kft., WSZL Automotív Kft., Waberer's Network Kft., Rapid Teherautó Szervíz Kft., and Delta-Rent Kft. participated.

Based on the results of the satisfaction survey, voluntary sponsor groups were formed by employees around topics deemed to require development, which facilitate dedicated progress. The sponsor groups take stock of the development points raised, then develop goals and actions for them. Among the areas considered most important during the satisfaction survey were making the work environment more comfortable and improving work-life balance. Improving the work environment, work-life balance, and meeting other employee needs positively impacts employees' well-being and quality of life, and through this, their work performance. The specific measures are detailed in the sub-chapter **[S1-4] Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches**. From the Company's perspective, the potential failure of these developments poses a financial risk, as it may lead to employee dissatisfaction and increased staff turnover. Based on employee feedback, annual performance appraisal and parallel career planning have been integrated for employees concerned<sup>17</sup>. The Company collected the results of the performance assessment at both Group and entity levels.

At Gránit Biztosító, there is no employee satisfaction survey similar to the above, nor is there a dedicated platform for receiving employee feedback. At Gránit Biztosító, area managers handle employee suggestions and feedback at the team level. The central communication channel is rarely used, only for matters affecting the entire company.

In the case of LINK Sp. z.o.o., employees have not yet been involved at the local level in discussing vital topics. LINK employees participated in the Group-level double materiality assessment by completing the questionnaire to determine significant IRO topics. No other platform or separate satisfaction survey is pres-

ent at the subsidiary, with area managers handling employee suggestions and feedback at the team level.

Effective employee relations are particularly facilitated by the trade union representation of employees and regular leadership consultations with trade union members. The general HR area of the Company includes the management and control of internal communication on human issues, as well as liaising with occupational safety advocacy organisations. In the event of any arising issues, informal consultations take place between trade union representatives and the head of the HR area. Annual collective wage negotiations and wage agreements occur for employees covered by the collective bargaining agreement.

Employees of the following companies are covered by the collective bargaining agreement, and these subsidiaries have trade union membership:

- Waberer's International Nyrt.
- WSZL Kft.
- Nexways Cargo Kft.
- Waberer's Slovakia S.R.O.

Waberer's Network, Delta-Rent Kft., All in One Kft., WSZL Automotív Kft., Rapid Teherautó Szervíz Kft., LINK, Magyar Posta Insurers, and Gránit Biztosító do not have a trade union and do not have a collective bargaining agreement.

The Company accommodates employee representation as prescribed by law. Employee representation is provided by advocacy organisations elected by the employees. The cooperation between the Company's management and the advocacy organisations, as well as the rights and obligations, are contained in the collective bargaining agreement. The Company ensures compliance with the directives of the European Union and Hungarian legal regulations. The Company does not refer to a specific international framework in its policy (this is also true for LINK Sp. z.o.o. and Gránit Biztosító, where there is no global framework agreement regarding the respect of employees' human rights). The employee satisfaction survey also covered which communication channel employees would find most useful. Communication through newsletters and the

<sup>17</sup> In the case of Waberer's Slovakia S.R.O., the performance assessment system has not yet been introduced.

printed access for the blue-collar workforce improved significantly during 2024. Waberer's Group shared relevant information with employees thematically and consistently. The Group's management provides information on the economic situation and the status of strategic plans at the quarterly live-streamed online briefing, where employees also have the opportunity to ask questions and receive answers live.

LINK Sp. z.o.o. manages the effectiveness of cooperation with employees through employee representation, which is the responsibility of HR and the Board of Directors.

The Company enables employees with disabilities or reduced capacity for work

in white-collar and blue-collar positions to learn about the tax benefits available to them and to consult the advisor provided by the company. The provision of such information for truck drivers also began in 2024.

In the case of Gránit Biztosító and LINK, no specific action is defined for the protection of disadvantaged groups.

### 3.1.4 [S1-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

The receipt, preliminary analysis and processing of infringement notifications is carried out by an infringement coordinator within the Company.

The infringement coordinator investigates ethics complaints together with the members of the Committee for Ethical Work Conduct (CEWC).

Concerns can also be reported through the trade union, to the HR department, but primarily employees may use the whistle-blowing system to report their complaints. The appropriate internal functioning of the Company is ensured by the Code of Ethics and the whistle-blowing system. Both external and internal parties are provided with the opportunity to report their concerns anonymously. Every report is thoroughly investigated, and the complainant is continuously informed about the progress of the investigation and the appropriate remedy. The Head of Internal Audit reports regularly (quarterly) to the Supervisory Board on the reported whistle-blowing cases and their consequences and experiences. These processes are governed by the CEO Group-Wide Order No. 29/2022.

Reports are received via an email address, based on which an internal database is created; this database facilitates the monitoring of cases.

The appropriate internal functioning of the Company is ensured by the Code of Ethics and the whistle-blowing system, which provides the opportunity for employees and external stakeholders to report any potential violations anonymously.

In addition, a Trust Line is available for truck drivers to report their complaints (while the whistle-blowing platform is specifically for addressing ethical griev-

ances committed by employees, the Trust Line can address all other types of issues, such as suspected payroll error reports). The whistle-blowing platform falls under the jurisdiction of Internal Audit, while the Trust Line is under the HR area's jurisdiction.

Potential whistle-blowing cases are investigated by the infringement coordinator (currently: the Head of Internal Audit), and the proposal for applicable legal consequences falls under the jurisdiction of an independent committee:

- in the case of ethics complaints, the CEWC (Committee for Ethical Work Conduct) acts, whose members include the Company's HR Director, external labour lawyer, and the Head of Internal Audit,
- in cases of economic misconduct and abuse, in addition to the Company's HR Director, the Legal and Compliance Director, and the Head of Internal Audit, the committee invites the professional leader necessary for the substantive assessment of the given report.

At the subsidiaries, issues can also be handled locally, but all employees and external stakeholders have access to the Group-wide system, and they may report their complaints anonymously via the [visszaelessek@waberers.com](mailto:visszaelessek@waberers.com) email address.

Gránit Biztosító and LINK Sp. z.o.o. receive infringement and violation reports through their own whistle-blowing systems. In the case of LINK Sp. z.o.o.,

complaints can be submitted via the company's website, by phone, and through the intranet, which are investigated by a five-member committee. LINK Sp. z.o.o. reports the cases quarterly to the infringement coordinator of Waberer's International Nyrt.

At Gránit Biztosító, there is also an opportunity for internal complaints reporting, which is subject to the provisions of the Complaints Handling Policy. Complaints can be made both verbally and in writing. The Compliance Officer and the Internal Auditor assess the significance of the reported issue and further investigate complaints that pose significant risks to operations. The process for handling reports is detailed in Gránit Biztosító's document entitled "Rules for the Use of Anonymous Reporting," which all employees of the Insurer are expected to be familiar with.

Employees of the Company receive information about the channels available for expressing and handling concerns upon entering employment. Further information is available on the intranet for employees, who are required to complete annual training regarding the use of the whistle-blowing system.

The person making an anonymous report, if their identity is established, is entitled to full protection in both the Company's Hungarian and foreign subsidiaries. The personal data of the whistle-blower and other data enabling the establishment of their identity may only be disclosed with the express consent of the whistle-blower. The Company does not have a separate anti-retaliation policy; however, the whistle-blowing procedure prohibits retaliation against the whistle-blower even if the report of infringement was made in good faith and the investigation found

that the reported infringement did not occur. Retaliation against the whistle-blower does not apply to a whistle-blower who is also the perpetrator of the infringements or an accomplice of the perpetrator.

LINK Sp. z.o.o. has internal rules of procedure in their Whistle-blowing Policy for handling the whistle-blower, which

prescribes the protection of the whistle-blower if the report is based on a good faith determination.

At Magyar Posta Insurers, employees have access to an internal whistle-blowing system available through multiple channels. The related mandatory annual training materials (Compliance, Fraud Management)

specifically address complaints handling mechanisms. Employees are required to participate in training related to the internal whistle-blowing system. The Compliance/Quality Assurance department also draws employees' attention to relevant topics through campaigns, providing information from multiple perspectives.

### 3.1.5 [S1-4] TAKING ACTION ON MATERIAL IMPACTS AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS AND APPROACHES

The Company conducted a double materiality assessment, during which significant risks, opportunities, and impacts related to its own workforce were surveyed.

The Company involved its own employees in determining the impacts, in the form of a questionnaire. The results of the survey and the related measures are continuously being implemented into the Company's ESG strategy, which is currently being revised, and will apply to all employees of the Company. The current ESG strategy is valid until 2026.

The current ESG Strategy is not linked to the OpEx and CapEx amounts of current or future financial resources. The connection of current financial resources to the most relevant amounts in the financial statements is currently unavailable.

For the action plan related to own workforce and workers in the value chain, i.e., the social pillar in the ESG Strategy, the Company has not allocated separate resources; they can break down costs based on their implementation. More information on workforce-related costs can be found in the Company's annual report.

The Company operates an anonymous complaints reporting system to prevent significant negative impacts on its own workforce. The complaints handling process includes a detailed investigation, followed by evaluation and decision-making. Documentation is two-way, and the employee is also informed throughout the process. Quarterly, at supervisory board meetings, the details of incidents that occurred during the period are presented anonymously, grouped by type of report. The details are contained in sub-chapter **[S1-3] Processes to remediate negative**

#### **impacts and channels for own workers to raise concerns.**

The Company's current measures, whether regarding the correction of significant negative impacts or the exploitation of significant positive impacts, do not fully cover, at the Group-level, the IROs established during the 2024 double materiality assessment. During the 2025 revision of the ESG Strategy, it will be a priority to ensure that the new strategic measures fully address the significant impacts, risks, and opportunities exerted by the Company on the workforce.

To correct smaller, non-strategic level negative impacts, several new focus areas have been integrated into the Company concerning employees. The focus areas were determined based on the results of the employee satisfaction survey. Based on the results of the employee satisfaction survey, the management identified three key areas for improvement and made commitments to enhance these:

- Appreciation and feedback – Employees expressed a need for more feedback from their leaders regarding the evaluation of their work.
- Communication and work environment – Staff advocated for an even more pleasant workplace atmosphere and better collaboration.
- Development and training opportunities – Staff desire more opportunities for personal and professional development.

The following measures have been imple-

mented in these areas, with the primary aim of having a positive impact on the Company's workforce:

- Introduction of a performance assessment system: In 2024, the Company launched the Performance Assessment System (PAS), which provides an opportunity for employees to receive and give direct feedback with the involvement of their supervisors. The system helps identify individual development areas and enhance strengths. The next performance assessment discussions are expected in the second quarter of 2025.
- Improvement of work environment and communication: In 2024, the Company's HR function sent a summary briefing on the work environment improvement projects implemented, so that all employees can understand the changes and their impacts.
- Expansion of development and training opportunities: To promote professional development, the Company launched dual training programmes in alternative propulsion technician, logistics technician, business administration clerk, and IT system and application operator technician specialisations. Additionally, over the past year and a half, numerous soft skill development trainings have been provided, including:
  - Communication trainings aimed at developing effective interactions,
  - Self-awareness and motivational trainings supporting personal development and workplace mo-

tivation,

- Leadership and collaboration development programmes, as well as sales trainings,
- Train-the-Trainer programme for mentors,
- ECO-driving training for truck drivers to acquire a more sustainable driving style.

With the active involvement of employees, voluntary focus groups have been formed to develop three areas, concentrating on the following topics:

- Improvement of work environment, in which case the following measures were taken at WSZL:
  - Procurement and distribution of 75 new chairs in the transportation and warehousing areas,
  - Creation of a vandal-proof driver rest area and changing room, re-using existing lockers,
  - Provision of a communication briefing for drivers (pictures, map),
  - Development of the parking system at Site G – entry is only possible with registered license plates,
  - Reallocation of D1 parking spaces, display of license plates,
  - Repair of D1 Samsung units,
  - Equipping the interview room and training room with new furniture.
- Strengthening cooperation between departments: The working group aimed at improving cooperation between partner departments met several times during the year to develop concrete ideas. Although significant progress has been made, these processes yield tangible results in the longer term.
- Development of the recognition system: The working group aimed at further developing the recognition system also meets regularly and is working on creating a structure that effectively supports employee moti-

vation and recognition.

All these initiatives contribute to creating a more supportive, collaborative, and motivating work environment in the long term.

The Company primarily communicates with employees via electronic mail, for example, regarding developments related to the incorporation of employee feedback. Information on various programmes and available employee benefits (including discounted sports opportunities or the possibility of discounted participation in cultural events) is accessible to employees on the intranet. For employees in blue-collar positions, public information is posted on the notice board located on the premises.

The Company plans to implement feedback measurements on the success of new measures in several ways in the future. One such tool is the previously mentioned biennial employee satisfaction survey. Employees will be informed of the results, among other things, through the work of sponsor groups. Another tool for involving employees and broadening communication is the quarterly results communication, the “Ask the Management” event. During the forum, the financial results, achieved milestones, and upcoming targets are presented by the senior management, and employees may pose their questions live to the senior management. The Company ensures that its own practices do not cause significant negative impacts on its own workforce. The Company complies with international and domestic legal regulations applicable to its operations. Strict rules are in place for drivers as imposed by the European Union, thus regulatory control ensures the avoidance of negative impacts (including, for example, rest periods or professional preparedness). The Company’s employees undergo annual screening tests, and the appropriate vaccinations are provided regularly and mandatorily for the affected group.

In addition to the aforementioned economical driving training, employees driving alternative powertrain vehicles (electric or LNG-powered vehicles) receive training to minimise any potential physical risks associated with this. The training delivers information about the safe refuelling of LNG-powered vehicles, as well as the maintenance of these vehicles for employees working in the service.

Magyar Posta Insurers pay special attention to the well-being of their employees and the realisation of work-life balance. Beyond the legally prescribed leave, they provide flexible and adaptable work schedules, as well as additional leave beyond the statutory requirement for their employees. Every employee on the permanent staff starts the year with a minimum of 25 days of leave, thus the employer supplements the basic leave and age-related additional leave to a total of 25 days. According to current legal regulations, the paternity additional leave days are supplemented by an additional 5 working days by Magyar Posta Insurers. For employees, a budget of approximately HUF 20 million was available in 2024 for training.

Magyar Posta Insurers hold forums at the quarterly local meetings of organisational units, led by the responsible management member and the Company’s HR manager, to involve employees. A formal employee satisfaction survey was also conducted previously at the Company. The feedback on employee satisfaction with the measures was conducted during the regular employee satisfaction survey.

Further measures related to the employees of Magyar Posta Insurers will be determined in 2025 during the revision of the Group-wide ESG Strategy.

LINK Sp.z.o.o. is not yet covered by the Group-wide ESG Strategy, and they will also be involved in 2025.

### 3.1.6 [S1-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

The Company’s ESG Strategy, currently being revised, includes various actions and measurable target values, key performance indi-

## Factors in topics affecting material impacts and risks, which have been defined along the following three strategic objectives.

The Company has not yet adopted SMART (specific, measurable, achievable, relevant, time-bound) goals due to the significant expansion of the Group in the 2024

financial year.

The specific goals defined at the Group-level will be reviewed in 2025 and established in the form of SMART indica-

tors. The baseline for the goals, against which future comparisons and progress measurements will be made, will be the 2024 values.

Measurable targets related to own employees defined in the ESG Strategy:

	Actions (at entity or Group-level)
<b>Training and developing employees, increasing engagement</b>	Maintaining development opportunities for blue-collar workers with continuously reviewed training materials available in multiple languages .
	Development of a training plan for white-collar workers and managers
	Maintaining a voluntary sponsor group of employees to monitor points for development and progress
	Increasing employee knowledge level regarding environmentally-friendly solutions
	Providing professional training opportunities (e.g., for special logistics tasks)
<b>Improving working conditions (pay, working hours, health and safety, comfort, environment)</b>	Maintaining employee satisfaction surveys, translating results into action plans
	Improving road safety for employees .
<b>Harnessing the potential of diversity</b>	Providing female instructor mentors for the training of female drivers
	Raising employee awareness (prejudice-free and equal opportunities)
	Making buildings accessible
	Supporting employees with disabilities or reduced capacity for work (rehabilitation programme)
	Building international workforce attraction capability

The material strategic areas were defined based on the materiality assessment conducted in 2023, which was prepared according to the GRI framework and related methodologies. As part of the sustainability report for the 2024 financial year, prepared according to CSRD, the Company conducted a double materiality as-

essment, based on the material impacts, risks, and opportunities of which the ESG Strategy will be reviewed. During the review, the Company will extend the targets to LINK, as well as the Romanian and Slovak subsidiaries. The integration of newly joined companies into the Company is planned to be continuous.

Gránit Biztosító also has its own separate targets in addition to the Group ESG Strategy goals applicable to it. LINK Sp. z.o.o. and Magyar Posta Insurers have not yet been included in the scope of the ESG Strategy, but the Company commits to do this during the 2025 revision.

### Targets defined for Gránit Biztosító in the ESG Strategy for the already mentioned three main strategic areas:

	Actions
<b>Training and developing employees, increasing engagement</b>	Development of an annual training plan for white-collar workers and managers, increasing employee knowledge level regarding environmentally-friendly solutions.
<b>Improving working conditions (pay, working hours, health and safety, comfort, environment)</b>	Increasing the proportion of part-time and remote workers to create a work-life balance
	Review of male-female pay ratios in identical positions.
<b>Harnessing the potential of diversity</b>	Supporting employees with disabilities or reduced capacity for work: making buildings accessible.
	Raising employee awareness in the areas of elimination of prejudice and equal opportunities
	Employment of retirement-age employees

LINK Sp. z.o.o plans to implement SMART (specific, measurable, achievable, relevant, time-bound) objectives and develop a training plan for its employees. The subsidiary's own goals largely align with the Company's overall Group-level targets and future plans, but currently operate as separate systems.

The Company involved stakeholders in the definition and validation of targets: conducted interviews with heads of responsible areas, provided a questionnaire option for external stakeholders, and conducted an ESG maturity assessment with management involvement.

The Company's strategic objectives related to its own employees are currently contained in the ESG strategy under revision, and the following internal policies also contain employee-related measures:

- Improving working conditions (working hours): Home Office Policy
- Training and developing employees,

increasing engagement Training policy

- Harnessing the potential of diversity Code of Ethics (separately for Gránit Biztosító)

The Company has not yet involved its own employees in the definition of the 2024 ESG Strategy and targets. Employees and trade union representatives were involved during the double materiality assessment, being surveyed in questionnaire form regarding the Company's significant impacts, risks, and opportunities. Their feedback will be considered during the review of the ESG Strategy. During the 2025 revision of the ESG strategy, the results of the employee satisfaction survey will also be integrated at the action level.

The Company regularly sends email notifications to its employees about the progress related to the targets, and trade union representatives also receive information in the same form. The Com-

pany also provides annual information to employee representation bodies (works council, trade unions) about the annual progress related to the targets, financial results, changes in headcount, and the expected opportunities and challenges for the next period. The annual briefing takes place with approximately 30 participants, and minutes are prepared about the information presented.

The monitoring of the effectiveness of policies and measures related to significant impacts, risks, and opportunities concerning sustainability will be a task within the scope of responsibility of the ESG Committee and ESG Working Group in the future. The ESG Committee has approved the ESG Policy establishing the ESG Working Group. The operation of the ESG Organisation is detailed in the sub-chapter **[GOV-1] The role of the administrative, management and supervisory bodies** in the Introduction chapter.

## 3.1.7 [S1-6] CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

The successful operation of the Company would not be possible without its well-trained and committed employees, as it has premises in four different countries, including branches – which are presented below – and conducts transport, freight forwarding and logistics activities in several European countries, as well as insurance activities in Hungary, with the support of a total of 6,569 employees in the 2024 financial year.

It is, therefore, self-evident that it prioritises the retention and development of employees, as well as the creation of safe and diverse working conditions. Based on the regulations of the Human Resources core process, the head of the department

responsible for personnel and workforce needs compiles the competency profile necessary for filling the position based on the workforce needs communicated by management. During the job analysis and competency profile compilation, any

legal requirements related to the position, the necessary knowledge, qualifications, skills, and competencies must be determined.

The main characteristics of the Company's employees are presented based on the headcount data aggregated as at 31/12/2024<sup>18</sup>, i.e., at the end of the reporting period, which can be viewed in the following tables:

The total number of the Company's employees broken down by gender (persons) <sup>19</sup>	
FEMALE	1,203
MALE	5,366
OTHER	-
NO INFORMATION	-
TOTAL EMPLOYEES <sup>20</sup>	6,569

For data detailed by country, the following companies were included in relation to each country:

- |                                  |                                    |                             |
|----------------------------------|------------------------------------|-----------------------------|
| I. <b>Hungary</b>                | f. WSZL KFT.                       | I. WPL-LOG ZRT.             |
| a. WABERER'S INTERNATIONAL NYRT. | g. WSZL AUTOMOTÍV KFT.             | II. <b>Poland</b>           |
| b. WABERER'S NETWORK KFT.        | h. RAPID TEHERAUTÓ SZERVIZ KFT.    | a. LINK SP. Z. O.O:         |
| c. NEXWAYS CARGO KFT.            | i. GRÁNIT BIZTOSÍTÓ ZRT.           | III. <b>Slovakia</b>        |
| d. DELTA-RENT KFT.               | j. MAGYAR POSTA BIZTOSÍTÓ ZRT.     | a. WABERER'S SLOVAKIA S.R.O |
| e. ALL IN ONE TRANSPORT KFT.     | k. MAGYAR POSTA ÉLETBIZTOSÍTÓ ZRT. | IV. <b>Romania</b>          |
|                                  |                                    | a. WABERER'S ROMANIA S.R.L. |

THE TOTAL NUMBER OF THE COMPANY'S EMPLOYEES BROKEN DOWN BY COUNTRY (PERSONS)	
HUNGARY	6,067
SLOVAKIA	41
ROMANIA	35
POLAND	426

CHARACTERISTICS OF THE COMPANY'S EMPLOYEES BROKEN DOWN BY COUNTRY, GENDER, AND EMPLOYEE CATEGORY (PERSONS)		
HUNGARY	2024	
Number of permanent employees (headcount) <sup>21</sup>	Female	860
	Male	4,446
	Other	0
	No information	0
	<b>TOTAL</b>	<b>5,306</b>
Number of temporary employees (headcount) <sup>22</sup>	Female	179
	Male	478
	Other	0
	No information	0
	<b>TOTAL</b>	<b>657</b>

<sup>19</sup> The number of the Company's employees has also been disclosed in the consolidated financial statements.

<sup>20</sup> The number of total employees also includes the headcount of temporary employees who work at the Company under temporary staffing, even though these workers are not employees.

<sup>21</sup> Employees employed full-time and under employment contract.

<sup>22</sup> Headcount employed under full-time temporary staffing arrangements. The headcount includes 574 persons who were part of the temporary workforce until 30/11/2024, but since they were present for most of the year, they were included in the calculation. Temporary employees will be presented in more detail as "workers in the value chain" in the [S2] Workers in the value chain sub-chapter.

Number of employees with non-guaranteed hours (headcount) <sup>23</sup>	Female	57
	Male	47
	Other	0
	No information	0
	<b>TOTAL</b>	<b>104</b>
Total number of employees (headcount)	Female	1,096
	Male	4,971
	Other	0
	No information	0
	<b>TOTAL</b>	<b>6,067</b>
<b>SLOVAKIA</b>		
Number of permanent employees (headcount)	Female	12
	Male	29
	Other	0
	No information	0
	<b>TOTAL</b>	<b>41</b>
Number of temporary employees (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	<b>TOTAL</b>	<b>0</b>
Number of employees with non-guaranteed hours (headcount)		
		0
Total number of employees (headcount)	Female	12
	Male	29
	Other	0
	No information	0
	<b>TOTAL</b>	<b>41</b>
<b>ROMANIA</b>		
Number of permanent employees (headcount)	Female	17
	Male	17
	Other	0
	No information	0
	<b>TOTAL</b>	<b>34</b>

<sup>23</sup> Part-time employees, part-time employees receiving child-care allowance (GYES), child-care benefit (GYED), child rearing support (GYET), retirees, and multiple employees.

Number of temporary employees (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	<b>TOTAL</b>	<b>0</b>
Number of employees with non-guaranteed hours (headcount)	Female	1
	Male	0
	Other	0
	No information	0
	<b>TOTAL</b>	<b>1</b>
Total number of employees (headcount)	Female	18
	Male	17
	Other	0
	No information	0
	<b>TOTAL</b>	<b>35</b>
<b>POLAND</b>		
Number of permanent employees (headcount)		
		0
	<b>TOTAL</b>	<b>426</b>
Number of temporary employees (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	<b>TOTAL</b>	<b>0</b>
Number of employees with non-guaranteed hours (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	<b>TOTAL</b>	<b>0</b>
Total number of employees (headcount)	Female	77
	Male	349
	Other	0
	No information	0
	<b>TOTAL</b>	<b>426</b>
<b>ALL COUNTRIES</b>		
Total number of employees	Female	1,203
	Male	5,366
	Other	0
	No information	0
	<b>TOTAL</b>	<b>6,569</b>

The logistics sector is characterised by a high turnover rate, and therefore the Company places particular emphasis<sup>24</sup> on curbing this trend as much as possible.

To make the operation of the Polish subsidiary more economical, the Compa-

ny implemented a headcount reduction. As part of this, foreign nationals employed were given the opportunity to continue their work at the Hungarian subsidiaries. The Company decided to reduce the workforce by not renewing expiring work

permits, in order to minimise employee dismissals. The Company continuously informed the affected employees about potential changes.

**At the Company, turnover – broken down by the largest business lines and countries – changed as shown in the table below for 2024:**

	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE				INSURANCE BUSINESS LINE	
	HUNGARY	SLOVAKIA	ROMANIA	POLAND	GRÁNIT BIZTOSÍTÓ	MAGYAR POSTA BIZTOSÍTÓK
Total number of employees who left the company in 2024	1,501	8	1	544	5	2
Turnover rate (%)	29.6%	20%	3%	128%	5.5%	0.8%

### 3.1.8 [S1-7] CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

Information regarding non-employee workers will be presented in the chapter **[S2] Workers in the value chain**. The

temporary workforce currently appears numerically among own employees, with related supplementary information availa-

ble in the [S2] chapter regarding the Company's approach.

### 3.1.9 [S1-8] COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

The Company is under a collective bargaining agreement and also facilitates social dialogue for its employees through the presence of representation.

The representation of employees in Waberer's transport, freight forwarding, logistics business line is realised in the form of a trade union and works council. The subsidiaries with trade union representation are as follows: Waberer's International Nyrt., WSZL Kft., Nexways Cargo Kft., Waberer's Slovakia S.R.O., Waberer's Romania S.R.L., Waberer's International Nyrt. and WSZL Kft. have works councils in place.

Waberer's Network Kft., WSZL Autómotív Kft., Delta-Rent Kft. and Rapid Teherautó Szervíz Kft., LINK Sp. Z.o.o, as well as Gránit Biztosító Zrt. and Magyar Posta Insurers currently do not have works

councils or trade unions. The data has been summarised in the table below. The Company does not have an agreement with its employees for representation by a European Works Council (EWC), European Company (SE) works council, or European Cooperative Society (SCE) works council.

Under Hungarian law, the employer may not keep records of employees joining a trade union, thus the Company does not have information on the percentage of employees with trade union representation.

<sup>24</sup> The calculation does not include the automotive business of WSZL Kft., nor internal movements within the Company. The turnover rate for the period between 01/01/2024 and 31/12/2024 is the ratio of the number of exiting full-time and part-time employees to the total headcount of full-time and part-time employees (excluding those employed under temporary staffing arrangements) as at 31/12/2024.

**Proportion of employees with employee representation by country:**

THE PERCENTAGE OF THE COMPANY'S EMPLOYEES WORKING AT SITES WITH EMPLOYEE REPRESENTATION <sup>25</sup>	
Hungary	89%
Slovakia	100%
Romania	100%
Poland	100%
<b>TOTAL</b>	<b>90%</b>

The scope of the collective bargaining agreements also extends to the employees of Waberer's International Nyrt., Nexways Cargo Kft., WSZL Kft., as well

as Waberer's Slovakia S.R.O. and Waberer's Romania S.R.L. Thus, 83% of the total workforce was covered by a collective bargaining agreement in 2024<sup>26</sup> LINK Sp.

Z.o.o., Gránit Biztosító and Magyar Posta Insurers employees do not have a collective bargaining agreement either.

**Proportion of employees with collective bargaining agreements by country:**

THE PERCENTAGE OF THE COMPANY'S EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS COMPARED TO THE TOTAL NUMBER OF EMPLOYEES IN THE COUNTRY <sup>27</sup>	
Hungary <sup>28</sup>	89%
Slovakia	100%
Romania	100%
Poland	0%
<b>TOTAL</b>	<b>83%</b>

**3.1.10 [S1-9] DIVERSITY METRICS**

The Company is committed to creating diversity and maintaining equality. Professional knowledge and qualifications are the most important criteria for selecting and promoting employees, and the recruit-

ment and promotion decisions are not influenced by ethnicity, nationality, religion, gender, or age. The Company's aim is to provide a safe and inclusive workplace for all its employees. Currently, no measures

have been defined in this regard, however, the Company strives to ensure a balanced gender ratio in management as well.

<sup>25</sup> Including temporary employees, the proportion of employees affected by employee representation is provided by country. The number of those with trade union representation in the given country divided by the total number of employees in that country. For the entire group, the number of all employees with representation divided by the total headcount, including the Insurers.

<sup>26</sup> Among the Hungarian transport and warehouse logistics subsidiaries, the following do not have a collective bargaining agreement in place: Waberer's Network Kft., WSZL Automotív Kft., Delta-Rent Kft., All In One Transport Kft., Rapid Teherautó Szervíz Kft., WPL-LOG Zrt.

<sup>27</sup> Including temporary employees, the proportion of employees covered by a collective bargaining agreement is provided by country. The number of those with a collective bargaining agreement in the given country divided by the total number of employees in that country. For the entire group, the number of all employees with a collective bargaining agreement divided by the total headcount, including the Insurers.

<sup>28</sup> The calculation includes 655 employees employed under temporary staffing arrangements, who are not covered by the collective bargaining agreement, but the conditions therein are available to them, albeit not within contractual frameworks.

## GENDER BREAKDOWN OF EMPLOYEES AT THE SENIOR MANAGEMENT LEVEL

	Number (persons)	Proportion (%)
Female	18	23%
Male	60	77%
Other	0	0%
No information	0	0%
<b>TOTAL</b>	<b>78</b>	<b>100%</b>

In the job “grade” system applied in the Waberer’s transport, freight forwarding, and logistics business line, employees in “C”, “D”, “E” grades are considered part of senior management, who were employed at any subsidiary as at 31/12/2024. The following positions fall into the “C”, “D”, “E” grades:

- Chairman and CEO,
- Board member responsible for key corporate relations,
- Chief Financial and Strategic Officer,
- Chief Director positions, most of

which have Group-level responsibilities, and

- Director positions.

In other subsidiaries belonging to the Company, in enterprises operating in the form of a Zrt., the CEO and board members, and in subsidiaries operating in the form of a Kft., the managing directors are considered part of senior management. In the case of Gránit Biztosító Zrt., senior management includes executive officers, i.e., members of the Board of Directors and Supervisory Board, the chief execu-

tive of the Insurer and their deputies, as well as other executives (Chief Actuary, Senior Legal Counsel, the Head of Accounting, the Internal Audit Officer, Chief Risk Officer, Compliance Officer). In the case of Magyar Posta Insurers, the senior management group includes the Management and Board of Directors members. The age distribution of the Company’s employees – broken down by the largest business lines and countries – changed as shown in the table below for 2024:<sup>29</sup>

## AGE DISTRIBUTION OF THE COMPANY’S EMPLOYEES

	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE								INSURANCE BUSINESS LINE			
	Hungary <sup>30</sup>		Slovakia		Romania		Poland		Gránit Biztosító		Magyar Posta Biztosítók	
	Headcount	Proportion (%)	Headcount	Proportion (%)	Headcount	Proportion (%)	Headcount	Proportion (%)	Headcount	Proportion (%)	Headcount	Proportion (%)
Employees under the age of 30	574	11%	1	2%	6	17%	57	13%	6	7%	43	17%
Employees between the ages of 30 and 50	2,614	52%	15	37%	27	77%	249	58%	52	57%	159	64%
Employees over the age of 50	1,884	37%	25	61%	2	6%	120	28%	33	36%	47	19%

## 3.1.11 [S1-10] ADEQUATE WAGES

In the countries where the Company operates, namely Hungary, Slovakia, Romania, Serbia, and Poland, 100% of employees receive adequate wages, in line with Directive (EU) 2022/2041 and the respective local legal requirements, meaning the Company provides employees with at least the local minimum wage or guaranteed wage minimum as a reference value.

In addition, several times a year, a wage market survey is conducted, based on which competitive wages and salary increases are determined. Based on mar-

ket information, the Company finds that the wage level offered by the Company was competitive compared to the national average in 2024 as well. For starting salaries, the Company strives to offer staff remuneration that is in line with market conditions. In the case of Magyar Posta Insurers, all employee compensations also met the prevailing Hungarian minimum wage and guaranteed wage minimum.

<sup>29</sup> The statistical headcount data as at 31 December 2024 were allocated based on recorded birth dates.

<sup>30</sup> The calculation does not include the headcount of employees employed under temporary staffing arrangements, except in the case of Magyar Posta Insurers

### 3.1.12 [S1-11] SOCIAL PROTECTION

All employees of the Company receive social protection against income loss due to significant life events, as employment registration entails obligations to pay taxes and contributions on employee and employer wages, which cover sick leave and sickness benefits, job-seeker's allowance, benefits for occupational or travel accidents, maternity leave benefits, and pension benefits.

Beyond the obligation, contracted general practitioner services are available

to support foreign employees working in Hungary, where multilingualism will also be ensured in the future. The operations of Magyar Posta Insurers are limited to Hungary, so the same applies to their employees, in accordance with applicable Hungarian laws.

100% of the Company's employees receive social protection.

### 3.1.13 [S1-12] PERSONS WITH DISABILITIES

The Company ensures equal opportunities for persons with disabilities<sup>31</sup>, as well as for those with reduced capacity for work<sup>32</sup>.

The Company has launched a separate project for employees to ensure they have adequate information about the tax relief opportunities provided by law, and it provides comprehensive administrative support during the process of claiming these

benefits. According to the headcount data as at 31 December 2024, the Company's entire workforce included 2.1% women and 0.6% men with disabilities or reduced capacity for work.

EMPLOYEES OF THE COMPANY WITH DISABILITIES OR REDUCED CAPACITY FOR WORK<sup>33</sup>

	Number (persons)	Proportion (%)
Female	25	2.1%
Male	34	0.6%
Other	0	0%
No information	0	0%
<b>TOTAL</b>	<b>59</b>	<b>0.9%</b>

### 3.1.14 [S1-13] TRAINING AND SKILLS DEVELOPMENT METRICS

To ensure continuous professional support, the companies within Waberer's transport, freight forwarding, logistics business line<sup>34</sup> conducted performance assessments for international truck drivers<sup>35</sup>, blue-collar and white-collar workers for the 2023-2024 period. In the case of Waberer's Slovakia S.R.O., performance assessments have not yet been conducted; group processes will be introduced in 2025, and at Gránit Biztosító, it only affects senior management.

The evaluation for 2023 was concluded in 2024, and these data are presented in the report, as the 2024 evaluation is currently ongoing, thus the gender ratio of employees participating in regular performance evaluations was determined based on the total headcount data for 2024:

31 According to the definition set by the Company, any person for whom the Company may claim a rehabilitation contribution allowance.

32 According to the definition set by the Company, any person eligible for a personal tax allowance.

33 The ratio does not include the headcount of temporary employees, due to the technical reason that the Company does not perform payroll for such employees, thus information regarding them is unknown.

34 No performance assessments or trainings are conducted at the Waberer's Slovakia S.R.O. and Gránit Biztosító Zrt. subsidiaries.

35 For truck drivers, performance assessments are also conducted monthly.

EMPLOYEES OF THE COMPANY WHO PARTICIPATED IN PERFORMANCE ASSESSMENTS OR CAREER DEVELOPMENT IN 2024<sup>36,37</sup>

	Number (persons)	Proportion (%)
Female	834	79%
Male	3,939	75%
Other	0	0%
No information	0	0%
<b>TOTAL</b>	<b>4,773</b>	<b>76%</b>

The average number of performance assessments per person in 2024 was 0.76, which did not include Magyar Posta Insurers, as flux data are available for them for the period from 29 November to 31 December 2024. For Magyar Posta Insurers, this figure was 1 per person during the period reviewed. 100% of the entire Mag-

yar Posta Insurers workforce participated in performance assessments in the 2024 financial year.

In addition to performance assessments, the companies within Waberer's transport, freight forwarding, logistics business line and Gránit Biztosító also provide continuous training for employees to

improve their performance on an ongoing basis. Considering the mandatory training hours (occupational and fire safety training, management system training, GDPR training, IT security training), the average number of training hours in the 2024 business year was as follows:

AVERAGE HOURS OF TRAINING PER EMPLOYEE <sup>38,39</sup>	
Female	2.25 hours
Male	3.45 hours
Other	-
No information	-
<b>TOTAL</b>	<b>3.25 hours</b>

In addition to mandatory training, a diverse educational portfolio is provided for employees. Among other things, the Company has developed an Eco-driving programme for our drivers, which not only aims at more efficient operation, but also focuses on sustainability. Training is compulsory for all our drivers and training materials are constantly being developed in Hungarian and foreign languages. In addition, the Company also considers the use of e-learning methodologies to be of paramount importance, where this is possible given the nature of the training. The Company employs numerous female drivers. Female instructors are used to train female drivers to improve knowledge transfer and confidence.

Training and development opportuni-

ties are also important for white-collar employees, for whom professional and personal skill development training has been designed and implemented. The Company's trainings included communication workshops aimed at developing effective interactions, as well as self-awareness and motivational workshops that support personal development and workplace motivation. In addition, employees had the opportunity to participate in leadership development, collaboration development, and sales training. In 2024, the Company achieved results in providing vocational qualifications related to the logistics and transport industry for its employees. To ensure professional development, dual training programmes were launched for obtaining qualifications as alternative pro-

pulsion technicians, logistics technicians, business administration clerks, and IT system and application operators.

At Magyar Posta Insurers, during the period from 29/11/2024 to 31/12/2024, the average number of training hours per employee was 1.04 hours for women, 1.02 hours for men, and the overall average was 1.03 hours per employee.

<sup>36</sup> The figures also take into account the 655 employees employed under temporary staffing arrangements.

<sup>37</sup> The figures in the table do not include information related to Magyar Posta Insurers as they were only members of the Group during the reporting period in December 2024, thus aggregating flux-type data would result in distortion.

<sup>38</sup> The figures also take into account the 655 employees employed under temporary staffing arrangements.

<sup>39</sup> The data provided do not include information related to Magyar Posta Insurers as they were only members of the Group during the reporting period in December 2024, thus aggregating flux-type data would result in distortion.

### 3.1.15 [S1-14] HEALTH AND SAFETY METRICS

The health and safety of employees are of primary importance to the Company.

To ensure the safe and responsible transport and handling of dangerous goods, every two years our designated employees undergo training that is audited and certified by the authorities, in addition to mandatory safety training. The companies within the Waberer's transport, freight forwarding, logistics business line have warehouses for dangerous goods, with external consultants also helping to monitor processes and liaise with the authorities. Training in the handling of dangerous goods is available for different areas and internal safety plans are also in place. Our long-term goal is to continuously improve the transport and handling of dangerous goods and to comply with current

international and local regulations. In the course of operational processes, a total of 12 major categories of products and services can be distinguished that may affect the health and safety of employees. Their impact is continuously measured by the companies within the Waberer's transport, freight forwarding, logistics business line in order to reduce the associated risks and intervene where necessary.

A safety risk assessment is conducted for every job position. For employees in hazardous positions, appropriate vaccinations are provided, and it is mandatory for everyone to participate in an annual occupational health screening. Employees are also regularly provided with opportunities

to participate in additional screening programmes, which offer possibilities beyond statutory requirements. The working conditions of the Company's employees are under strict monitoring.

The Company currently does not have an extensive health and safety management system, ISO 45001 certification. In the case of the Polish subsidiary LINK Sp. z.o.o. and at a single warehouse logistics site in Hungary, WSZL Kft. operates a health and safety management system (ISO 45001).

The Magyar Posta Insurers did not have a health and safety management system in 2024 either.

During the reporting period, the following health and safety metrics were summarised:

HEALTH AND SAFETY METRICS						
	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE				INSURANCE BUSINESS LINE	
	Hungary	Slovakia	Romania	Poland	Gránit Biztosító	Magyar Posta Biztosítók
Number of workers covered by a health and safety management system	42	0	0	426	0	0
Percentage of workers covered by a health and safety management system	1%	0%	0%	100%	0%	0%
The number of fatalities due to work-related injuries and illnesses among own workforce (persons)	0	0	0	0	0	0
The number of fatalities due to work-related injuries and illnesses of other workers (e.g. workers in the value chain) at Company sites (no.)	0	0	0	0	0	0

The Company currently does not operate a group-level health and safety management system because in 2024, Occupational Safety, Accident Prevention, and

Fire Safety trainings and examinations were conducted with the participation of all employees, in compliance with legal requirements. No changes have occurred

that would justify tightening the regulations.

HEALTH AND SAFETY METRICS						
	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE				INSURANCE BUSINESS LINE	
	Hungary	Slovakia	Romania	Poland	Gránit Biztosító	Magyar Posta Biztosítók

Number of recordable work-related accidents among own employees (cases)	158	0	0	11	0	0
Total number of hours worked by own employees	9,491,760	67,653	53,883	1,103,832	139,520	38,680
Rate of recordable work-related accidents for own workforce	16,65	0	0	9,97	0	0
Number of cases of recordable work-related ill health among own employees, subject to legal restrictions on data collection (cases)	0	0	0	0	0	0
The total number of days lost due to work-related injuries and fatalities resulting from work-related accidents and work-related illnesses and fatalities resulting from illnesses for own employees (no.)	3,279	0	0	461	0	0

### 3.1.16 [S1-15] WORK-LIFE BALANCE METRICS

To maintain employee well-being, including work-life balance, the Company acts in accordance with legal requirements (based on the labour laws of the respective operating country) and beyond in terms of family-related leave for employees.

The Company includes additional leave for children, parental leave, maternity leave, paternity leave, and start-of-school leave<sup>40</sup> in the concept of family-related leave.

All employees of the Company are en-

titled to additional leave for children, so the proportion of eligible employees at group level is 100%.<sup>41</sup>

The proportion of employees who took family-related leave – broken down by the largest business lines and countries – in 2024:<sup>42</sup>

	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE								INSURANCE BUSINESS LINE			
	Hungary		Slovakia		Romania		Poland		Gránit Biztosító		Magyar Posta Biztosítók	
	Head-count	Pro-portion (%)	Head-count	Pro-portion (%)	Head-count	Pro-portion (%)	Head-count	Pro-portion (%)	Head-count	Pro-portion (%)	Head-count	Pro-portion (%)
Female	231	32%	1	8%	1	6%	2	3%	23	44%	39	26%
Male	1,181	27%	0	0%	4	24%	5	1%	9	23%	32	32%
Other	0	0	0	0	0	0	0	0	0	0	0	0
No information	0	0	0	0	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>1,412</b>	<b>28%</b>	<b>1</b>	<b>2%</b>	<b>5</b>	<b>14%</b>	<b>7</b>	<b>2%</b>	<b>32</b>	<b>35%</b>	<b>71</b>	<b>29%</b>

### 3.1.17 [S1-16] REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

As part of the Company's ESG Strategy, we are continuously im-

40 Start-of-school leave can be claimed for 1 working day for a child starting the first grade of primary school.

41 Start-of-school leave is applicable only at the Company's member companies: Waberer's International Nyrt., WSZL Kft., WSZL Automotív Kft., Rapid Teherautó Szervíz Kft., Waberer's Network Kft., Nexways Cargo Kft., Delta-Rent Kft., and All in One Transport Kft.

42 The figures do not include the leave of employees employed under temporary staffing arrangements.

proving working conditions and ensuring equal opportunities. The Company strives to ensure that all employees receive fair and uniform base pay by job position.

The Company shows the gender pay gap broken down by job roles, countries, and the two largest business lines, considering

that a single ratio does not provide comprehensive information on the gender pay gap due to different business lines, roles,

seniority, client assignments, and locations in different countries. Significant differences can be observed due to the local characteristics of pay structures applied in different sectors.

Gender pay gap ratio (%)			
Transport-freight forwarding-logistics business line		According to gross monthly base pay	According to base pay supplemented with other pay elements
Hungary	White-collar	23%	29%
	Blue-collar	11%	10%
	GKV <sup>43</sup>	3%	8%
Romania <sup>44</sup>	White-collar	39%	42%
Slovakia <sup>45</sup>	White-collar	19%	23%
	Blue-collar	n/a <sup>46</sup>	n/a
Poland <sup>47</sup>	White-collar/blue-collar/driver combined	8%	-
			-
			-

Gender pay gap ratio (%)		
Insurance business line		
Gránit Biztosító	White-collar	44%
Magyar Posta Biztosítók	White-collar	35% <sup>48</sup>

The breakdown of female and male wages was based on job position and country classification. The gender breakdown of wages for employees in white-collar and blue-collar positions, as well as truck drivers, is based on the monthly average of the annual gross base salary of employees active as at 31/12/2024, and the average of all other annual pay elements

– excluding any form of travel allowance. For Gránit Biztosító, Magyar Posta Insurers, and LINK Sp. z.o.o., the estimation was based on the monthly average hourly wage. The monthly wage was multiplied by the number of average monthly working hours (160), however, this did not affect the ratio.<sup>49</sup>

The full annual compensation ratio<sup>50</sup> is

presented in the following summary table. In calculating the remuneration rate, the estimated monthly base salary and other benefits of employees, multiplied by their monthly gross or hourly wage, were taken into account, regardless of the length of time they worked in the year in question.

	HUNGARY	GRÁNIT BIZTOSÍTÓ	MAGYAR POSTA BIZTOSÍTÓK	SLOVAKIA	ROMANIA	POLAND
Annual compensation ratio	23,48	13,4	6,4	2,48	2,76	3,44

43 Truck drivers

44 At the Romanian subsidiary, only employees in white-collar positions are employed, therefore, blue-collar workers and truck drivers are not included in the table.

45 At the Slovak subsidiary, only employees in white-collar and blue-collar positions are employed, therefore truck drivers are not included in the table.

46 In Slovakia, 100% of blue-collar workers were male in 2024, thus the pay gap ratio is not applicable.

47 At LINK Sp. Z.o.o., due to the physical characteristics of data reporting, employees in different job positions were not broken down.

48 For Magyar Posta Insurers, the given ratio was calculated by adding a 1-month bonus and then proportioning it to an hourly wage (calculated with 160 monthly working hours). For Gránit Biztosító, the calculated ratio does not include bonuses.

49 In determining the gross average base salaries, the calculation of average salaries was done in the local currency of each subsidiary's location. No purchasing power adjustment was made because the correctness of the ratios was not affected by the use of different currencies in each country.

50 The full annual compensation indicator is the ratio of the total annual compensation of the highest-paid individual (i.e., base salary, plus any additional pay elements, excluding any form of travel allowance) to the median of the annual total compensation of all employees (calculated without the highest-paid individual).

### 3.1.18 [S1-17] INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

The ethical operation of the Company is ensured by the Code of Ethics and the whistle-blowing system, which provides the opportunity for both white-collar and blue-collar employees and external stakeholders to report any potential violations anonymously. Detailed information about this mechanism can be found in the sub-chapter **[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns.**

In 2024, the number of incidents related to discrimination (including harassment) at the Company was a total of 3 cases. In the 2024 business year, 27 complaints were submitted to the whistle-blowing system, of which 17 complaints (60%) were found to be justified after investigation. Among these, 7 complaints were cas-

es of abuse, 6 complaints were related to inappropriate treatment or tone, 2 cases were related to the negative perception of Waberer's Group, 2 complaints were cases of conflict of interest, 0 cases were of discrimination, and 0 cases were incidents with severe human rights impacts (cases related to forced labour or child labour).

These cases were appropriately handled by the Company in accordance with relevant laws and internal corporate mechanisms. The legal consequences of the cases were verbal or written warnings, or the termination of employment for the employees concerned.

The Company does not prepare reports on fines, sanctions, and indemnifications, as there has been no incident, complaint (including complaints submitted to the OECD National Contact Points for Multinational Enterprises), or severe human rights impact that required official intervention, and the Company does not impose fines in such cases, so no related amounts appear in the financial report.

## 3.2 [S2] WORKERS IN THE VALUE CHAIN

The Company's own workforce is complemented by workers in the value chain, and in 2024, the role of temporary workers provided by staffing agencies was indispensable in the Company's operations.

During the double materiality assessment, the internal approach that guided the process was that temporary workers are not employees of the Company. Waberer's

Group distinguishes between workers and employees, with the employee group being the narrower set. Workers employed through temporary staffing agencies are

not employees. Thus, in 2024, temporary workers are considered as workers in the Company's value chain.

The headcount data for the Company's temporary workers in 2024 were as follows:

The number of workers hired through temporary staffing agencies in 2024<sup>51</sup>:

NUMBER OF TEMPORARY EMPLOYEES (PERSONS) <sup>52</sup>	
Female	177
Male	478
Other	0
No information	0
<b>TOTAL</b>	<b>655</b>

The number of temporary workers at Magyar Posta Insurers is not included in the above table, as it was only 2 persons, thus not reaching the materiality threshold

during the IRO assessment. The Company's non-employee workers include those under agency agreements, with student status, or supervisory board assignments,

with a total headcount of 130 in 2024<sup>53</sup>.

<sup>51</sup> The data presented in the table reflect the headcount as at 30 November 2024. On 31 December 2024, the temporary workforce in the Győr operation of WSZL Kft.'s automotive business was transferred to the new logistics service provider taking over the operation, reducing the number of temporary workers to 81 within the entire company Group.

<sup>52</sup> Number of full-time employees employed under full-time temporary staffing arrangements.

<sup>53</sup> To summarise the information of non-employees within own workforce, the Company applied the methodology used for the characteristics of its own employees.

NUMBER OF NON-EMPLOYEES (PERSONS)<sup>54</sup>

TOTAL	130
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Magyar Posta Insurers employ 16 people as non-employees, under agency contracts. This headcount is not included in

the above table, as it did not reach the materiality threshold during the Magyar Posta Insurers IRO assessment.

There is no accurate data available on the number of self-employed individuals.

### 3.2.1 [SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL(S)

The Company may have a significant and direct impact on the workforce provided through temporary employment agencies, and the impacts on workers in the value chain may be linked to the Company's strategy or business model in various ways.

The temporary workforce typically appears in the logistics sector, in warehousing, and within that, they work in significant numbers at the Győr site (up to 30/11/2024), in Budapest and Ecsér. During warehouse and physical work, specific activities arise daily, such as lifting heavy objects, operating machinery, driving various vehicles, administering incoming and outgoing shipments, or maintaining warehouse order – these are partly the responsibilities of own workforce and partly of temporary workforce. Due to their identical activities, typically the same impacts, risks, and opportunities may arise for temporary workers as for own employees. The Company has not yet developed a specific mechanism for identifying and managing vulnerable groups, neither for its own nor

for temporary workers. During the 2024 double materiality assessment, material topics were identified within the themes of Working Conditions and Equal Treatment and Opportunities concerning temporary workers in the value chain. In the Introduction chapter of the sustainability report, the **[SBM-3] sub-chapter** provides a detailed presentation of the material topics identified during the Company's double materiality assessment regarding 'Workers in the value chain' and their interaction with the strategy and business model.

The Company applies direct communication similar to that with its own employees for temporary workers, including their involvement in the employee satisfaction survey. Feedback is managed by

the Company with the involvement of the sponsor groups established as described in the sub-chapter **[S1-2] Processes for engaging with own workers and workers' representatives about impacts** and with the help of the HR area, whether it concerns systemic or individual incidents. The Company may face challenges as the commitment of temporary workers does not reach the level of its own employees. This may affect workplace stability, as they typically change jobs more flexibly and quickly. Therefore, a key goal is to support the increase of commitment with measures and a corporate culture that makes the Company attractive to them in the long term. The risk of child labour, forced labour, or compulsory labour does not appear, as the Company rejects these as per its Code of Ethics.

Gránit Biztosító does not have temporary workforce (such as a tied agent network).

### 3.2.2 [S2-1] POLICIES RELATED TO VALUE CHAIN WORKERS

The Company does not have separate policies related to workers in the value chain.

The same policies largely apply to temporary workers as to the employees in own workforce, which are detailed in the Social chapter of the Sustainability Report in **[S1-1] Policies related to own workforce** sub-chapter. All these policies facilitate appropriate cooperation with workers in the value chain, the transparent communication of obligations and expectations, and the respect for employee rights.

<sup>54</sup> Workers under agency contracts, interns (compulsory internship), supervisory board appointees.

### 3.2.3 [S2-2] PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

The same working conditions, rights, and obligations apply to temporary workers in the value chain and to own employees, thus topics relevant to own employees are also relevant to workers in the value chain.

Temporary workers are also included in the employee satisfaction survey, where they can provide feedback on the processes. Several trade unions operate within the Company. The changes proposed by the trade unions also apply to temporary workers, however, they are not covered by the collective bargaining agreement.

Temporary workers employed by the Company are also entitled to be members of a trade union. Temporary workers can report cases they consider problematic through their trade union representatives or directly to their direct supervisors. Issues and problems can also be reported to the Committee for Ethical Work Con-

duct (CEWC) through the complaints reporting platform detailed in sub-chapter **[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns**, which they also have access to. HR staff responsible for liaising with temporary employment agencies hold weekly discussions on current issues, performance assessments, and any potential problems. The main communication channel with temporary workers is the notice board, where they receive up-to-date information on all matters.

### 3.2.4 [S2-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

Complaints and feedback reported by temporary workers are investigated according to the mechanisms that also apply to own workforce.

Complaints from temporary workers are subject to exactly the same evaluation.

The Whistle-blowing system and the method and process for handling com-

plaints are detailed in the sub-chapter **[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns**. In 2024, no severe human rights issues or incidents occurred related to the upstream and downstream value chain.

### 3.2.5 [S2-4] TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS

The significant impacts, risks, and opportunities on workers in the value chain are almost identical to those of own employees, which emerge from the sub-topics of 'Working conditions' and 'Equal treatment and equal opportunities'.

However, several topics identified for own workforce are less relevant in respect of temporary workers. The results of the double materiality assessment related to workers in the value chain are detailed in the sub-chapter **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)**. According to the social dimension of the Company's ESG strategy

currently being revised, a key goal is the training and development of employees, increasing their commitment, improving their working conditions, and reviewing wages and other benefits, which equally apply to temporary workers. More information on the goals related to own workforce is available in the sub-chapter **[S1-5] Targets related to managing material negative impacts, advancing pos-**

**itive impacts, and managing material risks and opportunities**. The Company examines the effectiveness of measures based on the employee satisfaction survey. In 2024, the sponsor group met quarterly on a voluntary basis, and if there were results, these were communicated to the employees (for example, introducing new measures). In the next satisfaction survey, employees will be able to evaluate the measures. The objectives are realised in the form of projects with different time horizons. For the action plan related to own workforce and workers in the value chain, i.e., the social pillar in the ESG Strategy, the Company has not allo-

cated separate resources; they can break down costs based on their implementation. More information on workforce-related costs can be found in the Company's annual report.

A significant opportunity related to

workers in the value chain is that for certain projects, this type of flexible employment form primarily represents a financial opportunity. Where the Company needs to involve a larger number of staff, involving temporary workers is a possible solution.

From December 2024, employees belonging to the automotive sector were transferred to another employer under the title of change in the employer, as were the temporary workers belonging to the business line.

### 3.2.6 [S2-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

Detailed information on material negative impacts related to temporary workers can be found in the sub-chapter **[S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns.**

Measures related to positive impacts are detailed in the sub-chapter **[S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities,** and the measures applicable to own employees also apply to the

Company's temporary workers.

The principle of equal treatment prevails, and the same benefits, the same recruitment processes, the same qualification expectations, and the same criteria for performance assessment apply to both temporary and own workforce, re-

ducing the negative consequences arising therefrom. Information on recruitment and hiring is available in the chapter **[[S1-6] Characteristics of the undertaking's employees.**

The Company does not have measurable goals for temporary workers, due to the fact that the largest operation employing temporary workers ceased at the end of November 2024.

## 3.3 [S4] CONSUMERS AND END-USERS

Waberer's Group pays special attention to the satisfaction and safety of its customers and end-users during its business relations (transportation-logistics) and services provided directly to end-users (partly insurance).

The following section presents how the Company manages consumer protection,

and responsible business operation risks in their case. The details of specifically sustainable services are detailed in the sub-chapter **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s).**

### 3.3.1 [SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL(S)

The Company's consumers and end-users can be divided into two groups along the Company's business activities, due to the different nature of the business lines and services.

In the Company's business lines dealing with international freight forwarding, transportation, and warehouse logistics, most activities are B2B (business to business) (except for home delivery, which is still considered relatively small-scale). The consumers and end-users are not private individuals or retail customers, but typically:

- Large corporations (FMCG, pharmaceutical industry, electronic commerce);
- Partners providing logistics services;
- The Company's joint ventures (currently still in a narrow scope, for example in the field of rail freight).

In the Company's insurance business line, both B2B and B2C (business to consumer)

activities take place, in which retail customers are predominant. The consumer base of Gránit Biztosító in Hungary consists of private individuals with property insurance or vehicle insurance and, to a lesser extent, sole proprietors or business partnerships. The customer base of Magyar Posta Insurers consists of retail customers. Magyar Posta Insurers maintain an exclusive sales and distribution partnership with Magyar Posta, and thus consciously undertake the risk of dependency on the sales partner.

The fulfilment of accurate and com-

plete information to customers has a positive impact on both retail and corporate customers, but any omission may lead to legal incidents, which can carry reputational and financial risks for the Company, even in the short term.

Consumer categories can be divided into two groups (corporate entities and private individuals) along sustainability impacts, and the Company follows the same guidelines for both groups. However, in practice, different contracts, information channels, and methods are applied according to the needs of the consumer categories.

Providing accurate and complete information to customers along the lines of conducting ethical business is an important sustainability topic in all business areas of the Company. This is particularly important in the case of Insurers, as they work with the personal data of the consumer base to a greater extent.

The complex logistics, freight forwarding, and transportation service activities operate in an integrated manner, with a service portfolio tailored to specific industry needs and customers. The expectations of the Company's customers, or the inadequate fulfilment of these expectations, greatly influence the course of business. The prolonged existence of challenges may result in reputational damage, and as a consequence, important partners and clients may turn away from the Company. Providing accurate and complete information to clients contributes to minimising the occurrence of identified risks. With the smooth operation of information dissemination, the Company exerts a positive impact on consumers and end-users, building reliability through the application of appropriate market practices; however, the absence of these may cause serious reputational and legal damage.

For Insurers, the financial risk is higher, as clients are mostly retail customers, private individuals. In addition to striving for a continuous and increasingly accurate understanding of consumer needs and life situations, the risks arising from these must also be minimised. Despite good faith business conduct, at Gránit Biztosító, there is a risk posed by the potential exposure of the consumer-formed risk pool to abuses and frauds, which indirectly relates to the identified material topic due to the external environment, and special attention is paid to mitigating this at the

company. Further information on risk management is available in the chapter **[G-Entity-specific] Risk Management**.

The Company has not yet distinguished particularly vulnerable consumer or client groups or sub-groups.

### 3.3.2 [S4-1] POLICIES RELATED TO CONSUMERS AND END-USERS

The Company's policies related consumers and end-users:

ESRS DISCLOSURE REQUIREMENT	MATERIAL SUSTAINABILITY TOPIC	RELATED POLICIES	SCOPE OF POLICIES (INDICATION OF DEVIATION FROM GROUP SCOPE) <sup>55</sup>
S4 – Consumers and end-users	Information-related impacts on consumers and/or end-users	Code of Ethics	Its scope extends to all subsidiaries of the Company, with the exception of the following subsidiaries: All in One Transport Kft. Waberer's Slovakia S.R.O. Gránit Biztosító Zrt. Magyar Posta Biztosító Zrt. Magyar Posta Életbiztosító Zrt.
		Code of Ethics	Gránit Biztosító Zrt. has its own Code of Ethics
		Waberer's Group procurement policy	The Company's procurement policy It does not apply to the following subsidiaries: All in One Transport Kft. Waberer's Romania S.R.L. Waberer's Slovakia S.R.O. Waberer's International Serbian branch LINK Sp. z.o.o. Gránit Biztosító Zrt.
		Order of procurement process	Procurement policy of Gránit Biztosító Zrt.
		Competition Law Policy	Waberer's International Nyrt. and the Hungarian subsidiaries fall under its scope, in accordance with domestic competition law regulations.
		UFU001 order concerning Customer Service and Customer Information Activities	Gránit Biztosító Zrt.
		Anti-Fraud Policy, regulations for the prevention and management of frauds	Gránit Biztosító Zrt.
		External and Internal Fraud Policy	Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.
		Complaints Handling Policy	Gránit Biztosító Zrt. Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.
		Whistle-blowing system	The common reporting platform of the entire Company for external and internal users
		Complaints reporting system	The reporting platform of Gránit Biztosító Zrt. for external and internal users Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.
		Complaints reporting system	The reporting platform of LINK Sp. z.o.o. for external and internal users
		Code of Conduct	The Code of Ethics of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.
		Supplier Code of Ethics	The Code of Ethics applicable to the suppliers of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.

<sup>55</sup> If the policy applies to the Company, it does not include the Magyar Posta Insurers, as they were not members of the Company for the majority of the 2024 financial year.

## The policies described extend to all customer groups within the Company, with the scope indicated above.

The Company's Code of Ethics sets out its fundamental principles regarding fair business conduct, whose mutual adherence can also have a positive impact on its clients. The Company's cooperation with clients is characterised by fair, equal, contract-based collaboration, respect for trade secrets, fair competition, and loyalty. In contracts with clients, the commitments regarding human rights obligations, as articulated in the Code of Ethics, such as disassociation from slavery or child labour, are reflected.

In the Company's international freight forwarding, transportation, and logistics business, in addition to adhering to its own and even the client's Code of Ethics, it assumes responsibility during the term of the contract by signing the document to execute the service entrusted to the Company while representing the client's interests. The Company believes that establishing mutual trust and fair business conduct with clients and partners, as well as providing them with high-quality and professional services, is a fundamental duty of the Company. The Company considers the establishment of a relationship with its employees based on mutual trust and ethical standards to be an obligation of both parties. Accordingly, the Company expects the following from both its employees and cooperating partners:

- The Company performs its tasks in accordance with the expectations of clients and partners, adhering to safety and security regulations and applying the best possible expertise to provide high-quality services and contribute to their development by considering the expectations and needs of clients.
- The Company always provides accurate and professional information to its clients and business partners, avoiding any misleading nature.
- Communication (written and/or verbal) with the Company's clients, as well as the management of any form of client relations, is conducted in a courteous and professional manner. It is strictly prohibited to behave offensively, use vulgar expressions, or exhibit behaviour contrary to general social norms during communication.
- During the provision of services, the

Company's employees handle clients' data confidentially and protect their assets to the best of their ability.

- During the provision and execution of its services, the Company does not engage in abuse of economic dominance.

The Code of Ethics is available on the Company's [website](#).

Gránit Biztosító's policy on customer satisfaction and customer information relates to Customer Service and Customer Information Activities. The policy establishes the rules for customer-centric organisational operation and the related personnel requirements. Gránit Biztosító's fundamental objective is to promote consumer satisfaction and ensure maximum compliance with consumer protection laws, which it achieves by enforcing the policy. The topics laid out in the policy on Customer Service and Customer Information Activities regarding clients include:

- Customer information in the pre-offer/pre-contracting process
- Customer information in the e-commerce process
- Accessible contracting options (for visually impaired and deaf or hard-of-hearing clients)
- Measuring the effectiveness of customer information activities
- Process-integrated checks

Gránit Biztosító has an Anti-Fraud Policy that includes measures for the prevention and management of frauds, thereby reducing the likelihood of financial risk arising from inadequate client information. The principles of the Anti-Fraud Policy:

- Protection of clients and Gránit Biztosító (and the risk pool formed by the insured clients)
- Zero tolerance
- Fraud prevention with regard to completeness, speed, proportionality, integrity, and employee ethics
- Fraud prevention monitoring system: risk-taking, portfolio management, claims settlement, IT solutions, monitoring activities

The related fundamental principles laid down in the Code of Conduct of Magyar Posta Insurers determine the actions of employees, including fair and respectful treatment of clients and business partners, as well as respect for the personal

rights of all individuals. Magyar Posta Insurers, like all subsidiaries of the Company, consider discrimination based on ethnicity, race, gender, religion or belief, as well as any disability, age, or sexual orientation, unacceptable in their business operations.

According to the principles laid down in the Code of Ethics, the Company treats all clients equally, allowing them access to services under the same conditions. The whistle-blowing system is available for reporting human rights incidents to all employees, subcontractors, and clients. Gránit Biztosító and LINK Sp. Z.o.o. have their own Complaints Reporting Interface – in addition to the Group-wide channel – where clients can also report their arising issues. The investigation and handling of complaints reported by clients are carried out as described in the sub-chapter **[S1-1] Policies related to own workforce**. The primary goal is to prevent the occurrence of incidents, but the Company also places great emphasis on handling incidents that do occur.

The Group Chairman-CEO is responsible for compliance with the policies. In the case of Magyar Posta Insurers, this is the Board of Directors.

The policies of the Company and the Insurers do not refer to international standards, nor do they examine the occurrence of human rights incidents.

### 3.3.3 [S4-2] PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

The Company regularly informs its clients about costs and measures affecting operations in the form of newsletters and partner meetings.

The Company adheres to its contractual obligations regarding information provision.

Before agreements are entered into, contact persons are designated from both parties, which forms the basis for clear and transparent communication. Preliminary client consultations are also typical, where the parties discuss operational details, and during negotiations, the contractual terms are agreed upon.

For successful cooperation with clients, the Company maintains continuous and direct written and verbal communication through designated communication channels:

- Operation of customer service with dedicated contact persons
- Maintenance of newsletters and social media pages

The Company regularly requests feedback from consumers through customer satisfaction surveys. The customer satisfaction survey is sent out annually, at the operational level, and in the case of KAMs (key account management) through the clients' purchasers. In addition, there are weekly, monthly, and quarterly operational meetings during which feedback is received on service quality and customer satisfaction. Ensuring the possibility of bilateral communication positively impacts cooperation,

as the Company aggregates general customer experiences and any additional needs, alongside individual requirements, which need to be addressed.

In addition to internal experiences, Gránit Biztosító also pays attention to customer feedback, improving its processes and customer information based on these. Feedback received verbally and in writing through customer service must be reported by customer service staff to the customer service manager, who interprets and considers the feedback and, if necessary, proposes modifications to the process or procedure based on the feedback. Feedback can practically be received continuously through customer communication channels. Through the standard feedback system, clients can rate Gránit Biztosító's customer information activities on a satisfaction scale (1-5) and can also provide free-text suggestions and comments to Gránit Biztosító.

Gránit Biztosító continuously collects information about the insurance market, the profitability of various insurance sectors and individual products, and sales opportunities. In addition, it continuously measures and analyses the profitability of its existing products, customer feedback, satisfaction, and changes in customer needs. Gránit Biztosító is constantly

seeking customer groups for whom it can develop innovative products that meet actual customer needs and provide unique, new business solutions.

Magyar Posta Insurers regularly conduct customer satisfaction surveys based on the Net Promoter Score (NPS) market research method. A detailed analysis is prepared quarterly from the responses to the questionnaires, examining the categories created based on the NPS value from several perspectives, including demographic groups, by Magyar Posta Insurers. A detailed analysis of customer complaints is prepared quarterly.

In the Company's international transport, freight forwarding and warehouse logistics business segments, the procurement director, operations director, commercial director, and marketing director are responsible for managing collaborations. At Gránit Biztosító, the operational responsible person is the Senior Legal Counsel of Gránit Biztosító, who is also the appointed consumer protection officer. At Magyar Posta Insurers, the compliance and quality assurance manager is responsible for consumer-related matters.

The above-listed measures all facilitate the Company's cooperation with clients, which the Company evaluates as successful. Currently, the Company does not have specific procedures to facilitate the protection of vulnerable groups; all clients receive equal treatment.

### 3.3.4 [S4-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

Clients of the Company and the Insurers can report their complaints through the channels provided for them, using the Whistle-blowing and Complaints Reporting systems.

The processing of reports follows a similar process as for internal stakeholders, which is presented in the sub-chapter **[S1-3] Processes to remediate negative impacts and channels for own workers to**

**raise concerns.** The same rules apply to clients and consumers in this regard as to the Company's internal stakeholders.

The Company conducts an annual customer satisfaction survey, where clients can

indicate their observations by completing a questionnaire. Through continuous communication and customer meetings, the Company receives regular feedback directly on the most current experiences of clients. For any issues that may arise, client representatives develop a strategy involving the client.

At Gránit Biztosító, in addition to the online Complaints Reporting system,

complaints can also be made verbally (in person, by phone), in writing (in person, via a document delivered by another person, by post, by electronic mail), or within the framework of a consumer protection procedure opened by the Magyar Nemzeti Bank. Gránit Biztosító maintains electronic records of complaints and the measures taken to resolve them.

For the Insurers, applying appropriate complaints handling mechanisms is not only an economic interest but also a legal requirement, similar to the entire Company. From the first moment of contact with clients, there must be a continuous oppor-

tunity to communicate any complaints or concerns. These opportunities are published by the Insurers on their websites in the detailed complaints handling information notice, and consumers are continuously informed about how to access these channels in individual cases.

At Magyar Posta Insurers, complaints are received through multiple channels, essentially without formal restrictions: in addition to the designated **online interface**, complaints can also be made via email, phone, and in person. For the evaluation of individual complaints, insurers have 30 days pursuant to legal regulations,

but Magyar Posta Insurers strive to complete the actual complaints handling in a fraction of this time (the average response time in recent years has been around 10 days). The complaints handling activity is continuously monitored by the Compliance/Quality Assurance department of Magyar Posta Insurers. A detailed report is presented to the management quarterly on the development of complaints cases and complaints handling activities for the given period, and Magyar Posta Insurers adjust the related processes based on the conclusions drawn.

### 3.3.5 [S4-4] TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

Currently, the Company does not have a separate action plan for clients.

The Company does not have uniform, measurable objectives for the entire client base due to the differing nature of various types of services, clients, and individual client needs. The ESG Strategy includes the most important strategic goals and actions along the environmental (E) and governance (G) pillars of sustainability, which indirectly affect them as well. Mag-

yar Posta Insurers have not yet been integrated into the Company's ESG Strategy, as they joined the Group in November 2024; however, this is planned for 2025.

The content requirements for agency contracts are included in the Waberer's Group procurement policy and the Competition Law Policy. The contracts include a penalty or the option to terminate the

cooperation in case the Company does not fulfil the contractual obligations. In addition, the Company holds monthly, quarterly, and annual performance meetings with key clients, during which service levels and other service-related issues are addressed, and if necessary, an action plan is developed to address problems.

In Waberer's transport, freight forwarding, and logistics business segment, the measures applied in 2024 regarding the impacts on clients include:

CATEGORIES	MEASURES
Administration	Communication training for the Operations organisational unit Information related to administration is available on the Company's website, broken down by business units.
Complaints handling	The Company handles incoming complaints using the reporting system available on the website and by applying the complaints handling measures described in sub-chapter [S2-2]. Development of an automated client information system based on complaints received due to potentially late shipments Availability of a personalised Order Monitor application, where clients can track the vehicles transporting their goods
Data processing	Ensuring data processing in accordance with the Data Processing Notice available on the website.
Pre-contractual information for clients	Organising preliminary consultations before the agreement, if necessary

**At Gránit Biztosító, the most important measures to protect consumer interests include:**

CATEGORIES	MEASURES
Administration	Various administration-related information is available on the website: complaints reporting, consumer page, financial navigator for conscious consumers, online payment information, FAQs.
Client portal	By registering on the client portal, clients can digitally track their contracts and documents in their own account.
Claims reporting	Clients may use the online claims reporting interface available on the website and the listed claims reporting channels.
Monitoring	A satisfaction survey related to customer service activities is conducted with feedback on the results.

**In 2024, the measures applied by Magyar Posta Insurers regarding the impacts on consumers include:**

CATEGORIES	MEASURES
Administration	Various administration-related information is available on the website: main contact details, electronic administration, messaging, client identification.
Complaints handling	The Complaints Handling Policy, the online complaints reporting interface, and various consumer forms (e.g. Magyar Nemzeti Bank, Financial Arbitration Board) are also available on the website.
Data processing	The general data processing notice, camera data processing notice, and cookie information are available on the website.
Claims reporting and claims settlement	Measures and information related to claims reporting and settlement are also available on the Magyar Posta Insurers website.
Pre-contractual information for clients	Measures applied before contract conclusion: client needs assessment assessment of sustainability preferences compliance and suitability test insurance product information client information with declaration information and declaration related to data processing
Monitoring	Magyar Posta Insurers act in accordance with legal requirements to reduce fraud.

The scope of the most important measures covers the entire client base, both corporate and private individual clients, with occasional deviations based on emerging individual needs.

For cases of fraud, the investigation and legal remedy are detailed in the sub-chapters **[S4-2] Processes for engaging with consumers and end-users about impacts** and **[S1-1] Policies related to own workforce**. The same rules of procedure apply to clients as in the case of complaints reporting by own employees. Fraud reporting and business complaints handling are directed to different channels.

Neither the Company's logistics arm nor the Insurers have a separate action plan for clients; the ESG Strategy's environmental (E) and governance (G) pillars contain the objectives. The Company has not allocated a separate financial frame-

work for clients in the ESG Strategy. More information on client-related costs can be found in the consolidated financial statements.

The ESG Strategy published by the Company at the beginning of 2024 also includes sustainability targets related to clients. The actions in the Strategy have different time horizons. The comprehensive strategic time horizon lasts until 2026; however, the relevance of the targets and actions will be reviewed in 2025 to align the ESG Strategy with the results of the double materiality assessment conducted in 2024. The strategic targets and actions are detailed in the sub-chapter **[S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**.

The Company ensures that client-related measures are evaluated by its clients

through regular client satisfaction surveys. Information related to monitoring client satisfaction is detailed in the sub-chapter **[S4-2] Processes for engaging with consumers and end-users about impacts**.

The Company strives for continuous improvement in the logistics and transportation sector. The quality management (ISO 9001) system aims for continuous, incremental improvement of process quality, product quality, delivery capability, and service quality. The development and regular integration of efficiency-enhancing measures into warehouse and transport operations increase client satisfaction, thus resulting in a positive impact for the Company. Thanks to bilateral communication, understanding client needs allows the ESG Directorate to provide new environmentally-friendly, sustainable solutions that fully meet client needs (e.g., CO2 emissions reporting, inclusion

of alternative propulsion vehicles and fuels, modernisation of vehicle and forklift fleets, other green solutions).

Before concluding insurance contracts, Gránit Biztosító must provide the prospective client with comprehensible, clear, precise, and detailed information in a certifiable and identifiable manner about the main data of Gránit Biztosító (the company's name, registered office, legal form, and address, designation of the competent supervisory authority, its address) as well as the fact that it conducts insurance

activities and the characteristics of the insurance contract. The practice is identical to that of Magyar Posta Insurers.

Gránit Biztosító has introduced a call peak management regulation to ensure the availability of customer service that enables consumer information. Through the regulation, an alert system has been introduced with staff involvement from the Administration Directorate. To maintain the expected level of accessibility, immediate capacity expansion is implemented, meaning that in the event of an increase in

incoming calls, the call centre staff is expanded through job reorganisation.

No severe human rights incidents reported and investigated in 2024 occurred with the Company's clients (large corporations, logistics partners, associated companies).

The Company and the Insurers do not have separate financial resources allocated for managing client-related impacts; costs are allocated on a project basis.

### 3.3.6 [S4-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

#### PUBLICATION OF MEASURABLE OBJECTIVES RELATED TO CONSUMERS AND/OR END-USERS

The Company is committed to increasing business flexibility and strengthening client relationships. Currently, the Company does not have measurable, result-oriented targets related to clients along the topics identified in the materiality assessment in its international transport, freight forwarding, and logistics business segment. The ESG Strategy will be reviewed based on the 2024 double materiality assessment, where the Company will also examine targets related to client impacts, risks, and opportunities. The targets summarised in the tables below primarily relate to business developments concerning clients, where sustainability aspects also appear along the ESG dimensions. In the ESG Strategy, the Company has not allocated resources specifically to the environmental (E) and governance (G) pillars; they will be able to break down costs based on their implementation.

Among the Company's business objectives is the development of a green portfolio, primarily along the lines of newly emerging green client needs. This includes, among others, the use of electric vehicles and fuels, monitoring CO2 emissions, and seeking and applying green solutions in warehousing. In the case of client development needs containing sustainable solutions different from those known, the Company strives to develop

and implement further solutions. The objectives of the marketing and commercial areas cover client needs, even at an individual level.

The Company did not involve external stakeholders in the development of the business strategy, thus in the definition of business objectives; however, feedback from clients was indirectly incorporated through staff. The main driving force of the business strategy at all times is client needs, as well as the environmental impacts, risks, and opportunities influencing these. The process of business strategy formulation falls outside the scope of this report; however, sustainability is an important part thereof, on which the ESG Strategy is built.

Gránit Biztosító has an annual objective regarding its performance related to consumers: they have set the target of maintaining the Customer Satisfaction Index (1-5) above an average level of 4.00. The regular monitoring of achieving the target is carried out with the help of a monthly report based on customer satisfaction feedback.

The goal of Magyar Posta Insurers is to improve customer-focused administration and – based on feedback from complaints experiences – keeping the ratio of justified to unjustified complaints below 15%.

The Waberer's international transport and freight forwarding business achieved a result above 4.00 in the satisfaction survey in 2024.

Following up on and managing feed-

back contributes to monitoring the effectiveness of policies and measures, but the Company does not currently examine their effectiveness directly. Internal Audit has an annual audit plan to follow how effectively the procedures outlined in the policies are applied in practice and where there are points to develop.

### The Company's targets related to clients as undertaken in the ESG Strategy

STRATEGIC GOALS	ACTIONS (AT ENTITY OR GROUP-LEVEL)
Increasing the share of rail and intermodal transport	Establishing railway logistics capability
Increasing the use of alternative powertrains	Testing and implementing alternative powertrain vehicles into operations, in cooperation with clients
	Establishing initial operations based on hydrogen technology, preparing a future expansion concept based on client needs
Increasing the use of alternative fuels	Continuous mapping of refuelling options, establishing a CO2 savings accounting process, extending operations
Developing sustainable storage technology	Client education and recommendations for establishing more sustainable processes
Greening the insurance segment's investment portfolio, introducing environmental product incentives	Establishing an ESG-focused investment policy and product portfolio
	For clients using property insurance products – retail, SME, and large industrial – effective risk reduction and damage prevention recommendations, information to prevent damage caused by flash floods
Strengthening stakeholder relations	Memberships in professional organisations, regular presence and knowledge sharing at business forums and conferences
	Measuring customer satisfaction and managing incoming feedback
	Client education on green services and industry trends
	Supporting clients' business continuity
	Strengthening collaboration along the supply chain
	Framing corporate social responsibility activities, defining areas to support
Increasing transparency and accountability	Obtaining extra ESG ratings expected by clients

## 3.4 [S-ENTITY-SPECIFIC] COMMUNITY INVOLVEMENT

The Company's commitment to community involvement is also demonstrated in practice: it supports communities and initiatives aimed at the education of disadvantaged children and young people in need, health preservation, as well as environmental protection and sports.

Resources available for support regularly reach both foundations and organisations. In the fundamentals of the Company's ap-

proach, social responsibility is important, aiming to provide assistance to those in need in every situation. In addition, it

strives to contribute to the success of the work of aid organisations with its professional knowledge.

The Company believes that as Hungary's leading complex logistics service provider, it has a responsibility towards both its immediate and broader environment. Through their activities within the framework of community involvement, the Company aims to contribute to the crea-

tion of a more sustainable and supportive community. The Company is committed in the long term to promoting the well-being of society and the environment, while setting a positive example for others. During its community involvement, it focuses particularly on health preservation: breast cancer awareness campaign, prostate examination campaign, free lung screening, cooperation with the Children's Safety Service involving a gynaecological and dental screening truck and bus touring the country; social support, and promoting education and sustainability. Such initiatives not only create value for society but also enhance the Company's reputation and the perception of the Waberer's brand, as clients and partners highly appreciate when a company responsibly and actively contributes to the life of the community.

In the case of certain campaigns, the Company pays attention to analysing the impacts created by community involvement. These include initiatives to which the Company allocates marketing and communication costs, thereby generating greater attention for the given cause and strengthening the positive impact on the community. Examples include the recent breast cancer awareness campaign or the

donation drive organised jointly with the Hungarian Charity Service of the Order of Malta, which highlighted the importance of health awareness and supporting those in need. These campaigns contribute to the Company's positive social perception while directing attention to solving specific problems. The Company regularly receives feedback on the results and success of campaigns implemented within the framework of community involvement: for example, at the end of the year, it receives summary reports via email from various associations and organisations detailing the use of support and the results achieved.

The Company's community involvement focuses on support that aligns with its service portfolio. The Company's core principle is to gladly assist in what it does best, whether it is transport or warehousing. Such support is primarily provided to major aid organisations, such as the Hungarian Charity Service of the Order of Malta and the Hungarian Food Bank, based on a predetermined annual budget. In addition, it is open to individual requests and strives to provide support as much as possible, especially if the cause truly serves a noble purpose.

Community involvement encompasses

several areas, including health preservation, social support, the promotion of education, and sustainability. These activities are coordinated by the marketing and communications team, who are responsible for managing sponsorships, contracts, appearances, and campaigns. Particular attention is also paid to ensuring that the Company's employees are as actively involved in the various programmes as possible, either as volunteers or participants. The principles of how well the organisation aligns with the Company's values and services are also applied in selecting the group of beneficiaries. It, in particular, supports initiatives that can utilise its professional experience in the fields of transport, logistics, and warehousing, for example, through the logistical execution of aid shipments. In terms of financial resources, a key factor is that the Company has existing collaborations and support that span several years, which determine the necessary basic framework. In addition, the management annually defines a flexibly usable budget, which is allocated based on current needs and opportunities. This approach allows it to maintain existing long-term programmes while remaining open to new initiatives.

#### KEY PROGRAMMES IN 2024

Light Truck for disadvantaged children	The Company delivered sweets to ten thousand disadvantaged children with a truck dressed in festive lights.
Announcement of the Woman Logistician of the Year Award	The Company announced the award for the second time, which in 2024 was expanded with the Young Woman Logistician of the Year category to increase the proportion of women in the sector.
Pink trucks and support for the Health Bridge Alliance Foundation in the fight against breast cancer	Two trucks painted pink toured Hungary and Europe to raise awareness of the importance of screening tests. The Company provided financial support to the Health Bridge Alliance Foundation.
Movember campaign	Two of the Company's trucks were given moustaches to draw attention to the importance of screening tests among men as well. As part of the campaign, free screening tests were organised.
Scholarship programme of the Children's Safety Service Foundation	For 17 years, 40 talented young people have been receiving a monthly Waberer's scholarship, supporting the continuation and development of their studies. In collaboration with the Children's Safety Service, the gynaecological and dental screening truck and bus toured the country.
Annual collaboration with the Hungarian Charity Service of the Order of Malta	The Company organised a donation drive for the organisation, and in addition, the strategic logistics partners of the Hungarian Charity Service of the Order of Malta provided services (undertaking free transport and warehousing) for the Company. Free fulfilment of transport assignments for the Hungarian Food Bank.

Support for the Nest Child Protection Association of Érd (Érdi Fészek Gyermekvédő Egyesület)	Financial and material assistance to improve the living conditions of the residents of the Nest Child Protection Centre of Érd.
Support for flood defence	The Company offered logistics and transport capacities to the Budapest Directorate for Disaster Management to assist in defence operations.
Support for animal shelters	Support for animal shelters with donations and transport assistance.
Free Screening tests for staff	To promote health preservation, free screening tests were provided on several occasions for the Company's employees.
Support for the Hungarian Gymnastics Federation	Annual support for the Hungarian Gymnastics Federation, and the Company was also the name sponsor of the Waberer's Gymnastics Challenge World Cup.
Saint Francis Foundation of Déva (Dévai Szent Ferenc Alapítvány)	Within the framework of the Angels Walking initiative, the Company provided free logistics services and organised a donation drive.
Ultrabalaton sponsorship	Financial support for the Ultrabalaton event.
Support for Győr ETO handball team	Annual financial support for the Győr ETO handball team.
One Step More Foundation adoption programme – Support for Áron Thúróczy	The Company financially supported the adoption programme of the One Step More Foundation, and Áron Thúróczy.

The Company does not have a policy or documented strategy for the operational organisation of community involvement. The Company plans to develop this framework in the following year.

Currently, the Company does not have explicitly defined metrics for community involvement, as formal regulation in this area has not yet been completed. However, in the case of individual projects, results are often evaluated based on feedback from supported partners and the community

impacts achieved. For example, the engagement achieved during campaigns or the amount of donations delivered, as well as communication reach (media appearances, conversions), serve as informal measurement tools. Currently, the regulation of community involvement is in development, so the Company do not have standardised, measurable targets. The focus has so far been on swift response, meeting current needs, and collaboration with partner organisations.

In the 2024 financial year, HUF 99,425,642 was distributed by the Company among the Hungarian Charity Service of the Order of Malta, the Hungarian Gymnastics Federation & Gymnastics Challenge World Cup Sponsorship, Ultrabalaton sponsorship, Győr ETO handball team sponsorship, One Step More Foundation (Áron Thúróczy), Health Bridge Alliance Foundation, Saint Francis Foundation of Déva, Hungarian Food Bank, and the Waberer's Foundation Athlete Scholarship.

## GOVERNANCE INFORMATION

The Company places great emphasis on creating high standards of business conduct and corporate culture and is committed to ensuring compliance with regulatory expectations at all times. The Company's reliable and transparent operation is facilitated by various internal regulations, well-thought-out processes, responsible management, and employees with appropriate expertise.

### 4.1 [G1] GOVERNANCE

This chapter presents the Company's policies and measures related to business conduct, including preventive measures against corruption and bribery, the operation of a whistle-blowing system, and the provision of employee training.

The corporate governance chapter outlines the characteristics of relationships with suppliers, the regulations governing them, payment practices, and the Company's role in industry advocacy.

## 4.1.1 [GOV-1] THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

In this chapter, the Company discloses the composition, roles, and responsibilities of the administrative, management and supervisor bodies, as well as the availability of expertise and skills related to sustainability issues.

The main governing bodies of the Company are the General Meeting, the Board of Directors, the Supervisory Board, the Audit Committee, and the Nomination

and Remuneration Committee, whose operations are detailed in Chapter 1, in the sub-chapter **[GOV-1]The role of the administrative, management and supervisory bodies**. The Waberer's Group has strict expectations for its directors, officers, and employees to comply with applicable Hungarian and international laws, as well as the obligations undertaken in the contracts signed and in force by the

Company, and to adhere to the highest standards of business ethics.

For a detailed presentation of the tasks and members of the individual governing bodies and committees, see the sub-chapter **[GOV-1]The role of the administrative, management and supervisory bodies** in Chapter 1 of the Sustainability Report.

## 4.1.2 [IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

The Company defined its material governance-related impacts, risks, and opportunities in the short, medium, and long term, along its own activities and value chain as part of its double materiality assessment.

This procedure is detailed in sub-chapter **[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities** in Chapter 1 of the Sustainability Report. The Company plans to incorporate the results of the double materiality assessment into the Group's ESG Strategy in the following year, which will also bring further measures and objectives in the area of corporate governance.

In relation to business activities, two entity-specific topics, risk management and data protection and data security, were identified during the double materiality assessment. More information on these is available in sub-chapters **[G-Entity-specific] Data security and data protection** and **Risk management** of Chapter 4.

Material impacts for the Company's

operations typically arise within business conduct, in the area of internal regulations, and are also significant in effective participation in industry representation, in relationships with subcontractors and suppliers, and in processes aimed at preventing and detecting corruption. The existing regulations related to the listed areas are presented in the further sections of the **[G1] Governance** chapter.

For Magyar Posta Insurers, no new material topic in the area of corporate governance was identified, and the results of the double materiality assessment were accepted by them.

## 4.1.3 [G1-1] CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

This sub-chapter presents the Company's most significant policies and measures from a corporate governance perspective.

The policies are typically accessible only by employees – for internal use – however, there are also public notices and guidelines available on the Company's website. Due to the specific characteristics of different operational segments, the Company's subsidiaries operating in the insurance industry have several independent policies, which are highlighted at relevant points.

The Company's most important policies and regulations related to disclosure minimum requirements are:

ESRS DISCLOSURE REQUIREMENT	MATERIAL SUSTAINABILITY TOPICS	RELATED POLICIES	SCOPE OF POLICIES (INDICATION OF DEVIATION FROM GROUP SCOPE) <sup>56</sup>
G1 - Business Conduct	Corporate culture Political engagement and lobbying activities Management of relationships with suppliers, including payment practices Corruption and bribery	Code of Ethics	Its scope extends to all subsidiaries of the Company, with the exception of the following subsidiaries: All in One Transport Kft.  Waberer's Slovakia S.R.O. Gránit Biztosító Zrt.
		Code of Ethics	Gránit Biztosító Zrt. has its own Code of Ethics
		The Articles of Association of Waberer's International Nyrt. effective from 12/04/2024	The deed of foundation of Waberer's International Nyrt.
		The Company's Organisational and Operational Regulations	Applies to Waberer's International Nyrt. as the parent company of the Company
		Procurement Policy	The Company's procurement policy It does not apply to the following subsidiaries:  Waberer's Romania S.R.L. Waberer's Slovakia S.R.O. LINK Sp. z.o.o. Gránit Biztosító Zrt.
		Remittance Policy	Policy applicable to the whole of the Company
		Order of procurement process	Procurement policy of Gránit Biztosító Zrt.
		Rules for the use of the anonymous complaints reporting system	Gránit Biztosító Zrt.
		Anti-Fraud Policy, and Regulations for the Prevention and Management of Frauds	Gránit Biztosító Zrt.
		Data Protection and Data Security Policy	Gránit Biztosító Zrt.
		Risk Management Policy	Gránit Biztosító Zrt.
		Competition Law Policy	Waberer's International Nyrt. and the Hungarian subsidiaries fall under its scope, in accordance with domestic competition law regulations.
		Anti-corruption Guidelines	Guideline applicable to the whole of the Company
		Whistle-blowing system	Policy applicable to the whole of the Company
		Conflict of Interest Policy	Policy applicable to the whole of the Company
		Whistle-blowing Procedure	Policy applicable to the whole of the Company
		Policy on the Accounting of Business Travel, Representation, and Business Gifts	Policy applicable to the whole of the Company
		Whistle-blower Policy	Separate policy of LINK
		Policy on Handling Reports of Violations of Ethical Conduct and Abuses	Policy applicable to the whole of the Company
		Waberer's International Nyrt.'s Remuneration Policy	Policy applicable to Waberer's International Nyrt.
		Guidelines on the Prohibition of Insider Trading of Waberer's International Nyrt.	Guideline applicable to the whole of the Company
		Disclosure Guidelines	Guideline applicable to the whole of the Company
		Organisational and Operational Regulations	Separate policy of Magyar Posta Insurers
Code of Conduct	Separate policy of Magyar Posta Insurers		
Training Policy	Separate policy of Magyar Posta Insurers		
Compliance Policy	Separate policy of Magyar Posta Insurers		

<sup>56</sup> If the policy applies to the Company, it does not include the Magyar Posta Insurers, as they were not members of the Company for the majority of the 2024 financial year.

Within the Company, the highest executive level responsible for the implementation of policies is the Company's Chairman-CEO. The Company's business policy issues are decided at a central level, and the Group does not have a control agreement.

Due to its partial stock exchange operation, the Company has an extensive internal regulatory system, which is under continuous development. In 2025, the Company will review the extension of the scope of those policies that currently do not apply to all its subsidiaries and will consider their application if they are relevant to their business operations.

On 29/11/2024, the Company acquired ownership stakes in Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt., which are considered new subsidiaries from the Company's perspective. The integration of the aforementioned two companies is still in progress, thus Group policies do not currently apply to them. The separate policies of Posta Insurers are mentioned separately at relevant points.

The Company's main corporate governance policies are accessible to both internal (e.g., employees) and external (e.g., shareholders, business partners) stakeholders on the Company's website, thereby increasing transparency and ensuring wide accessibility of information for stakeholders.<sup>57</sup>

The document titled Guidelines on the Prohibition of Insider Trading of the Company is available on the [Company's website](#). This document regulates the prohibition of insider trading for the Company in detail. The Company's shares have been listed on the Budapest Stock Exchange, therefore European Union and Hungarian legal regulations apply to it concerning securities trading, which serve the safe and transparent operation of the capital market. This policy contains guidance on the requirements related to insider trading and market manipulation applied by the Company, defines the Company's obligations regarding the handling and disclosure of insider information, and the basic principles for maintaining an up-to-date register of insiders.

The Company also has well-defined guidelines on topics related to the disclosure of information, which are detailed in the document titled the Company's Disclosure Guidelines; this is also available on the [Company's website](#). The Compa-

ny also has internal instructions regarding disclosures to comply with disclosure laws, public information expectations, and the principle of transparency. The regulatory environment of the Company's disclosure practice is constituted by various EU, national, and Budapest Stock Exchange rules. The Company's instructions related to insider trading prohibition and other capital market disclosures have been prepared considering this regulatory background. The Company regularly informs the public about its activities, and the main data of its financial and operational status in the financial reports published on a quarterly basis.

The Company also makes its current Remuneration Report publicly available, aiming to acknowledge the performance of the Company's governing and supervisory body members, as well as key employees, in achieving the overall results of the Company and to encourage these individuals to achieve further objectives. The members of the Company's governing and supervisory bodies evaluate their work every year, which evaluation is multi-level (self-assessment questionnaire, independence questionnaire, evaluation by the relevant bodies). The Company's Remuneration Policy provides for the remuneration of the governing and supervisory bodies, as well as key (highlighted) employees, the elements of remuneration, the structure of the remuneration system, and the details of the Employee Share Ownership Programme (ESOP).

The Company is also committed to complying with the Competition Law Policy, as this document defines the rules for implementing and following the laws and norms regulating economic competition in corporate practice, so that the Company's business operations and market behaviour comply with the relevant legal requirements, particularly the provisions of Act LVII of 1996 on the Prohibition of Unfair and Restrictive Market Practices, and to enforce these legal requirements and norms both at the corporate level and in the conduct of managers and employees. The Competition Law Policy is not a publicly available document, it is prepared for internal use.

Practising ethical business conduct is of paramount importance to the Company in its cooperation with clients. The Company's fundamental business standards are

contained in the Code of Ethics, which is publicly available on the Company's [website](#). The purpose of the Code of Ethics is to regulate the basic principles of conduct to be observed by the Company's leaders, employees, and business partners in relations with external business and other external stakeholders and in internal working relationships within the Company. The basic principles defined in the Code of Ethics clarify the Company's goals, approach, and attitude towards society, its employees, and business partners for external individuals interacting with the Company and its employees. Among the companies included in the scope of consolidation of the Sustainability Report, the subsidiaries subject to the policy can be viewed in the above table.

Shaping corporate culture is the responsibility of the Company's management, which actively involves employees as well. The Company provides detailed information about employee satisfaction surveys and "Ask the Management" sessions in the [Social chapter](#). The HR area plays a key role in conveying corporate culture, particularly in its development and implementation. Waberer's Group is committed to ensuring compliance with regulatory requirements and to setting appropriate internal organisational standards. The efficiency of organisational operation and regulatory compliance is ensured through well-defined policies, well-thought-out processes, and communication. The guidelines related to appropriate communication and liaising are contained in the Company's Code of Ethics. The Company's communication, including external and internal communication activities, marketing, advertising and sponsorship activities, the organisation of its events, and the operation of communication channels related to the above, are directed and managed by the Company's professional organisational units. Official information, statements, and interviews on behalf of the Company, in its representation, may only be given by designated persons. Except for authorised persons, it is not permitted to transmit or convey any information, news, document, image, or audio material that could endanger the Company's good reputation, in official or unofficial form, to any area of the media, nor to engage in any conduct that would harm the business interests of the Company or its partners.

According to the Company, the foundation of a lasting and successful business relationship is professional dedication, as well as the commitment of each employee to the Company and its clients and partners. The Company believes that establishing mutual trust and fair business conduct with clients and partners, as well as providing them with high-quality and professional services, is a fundamental duty of the Company. The Company considers the establishment of a relationship with its employees based on mutual trust and ethical standards to be an obligation of both parties. In this regard, the Company expects the following conditions to be met during interactions with business partners:

- The Company performs its tasks in accordance with the expectations of clients and partners, adhering to safety and security regulations and applying the best possible expertise;
- The Company always provides accurate and professional information to its clients and business partners, avoiding any misleading nature;
- Communication with the Company's partners, as well as the management of any form of client relations, should be conducted in a courteous and professional manner;
- During the provision of services, the Company's employees handle clients' data confidentially and protect their assets to the best of their ability;
- During the provision and execution of its services, the Company does not engage in abuse of economic dominance.

All employees of the Company must be familiar with the Code of Ethics. To this end, the Company provides training for employees upon entry and at specified intervals, which all employees are required to complete. The Company regularly monitors the completion of the training. Managers are responsible for ensuring that employees are familiar with the Code of Ethics and comply with its provisions. Currently, Gránit Biztosító does not have separate training on the content of the subsidiary's own Code of Ethics, but all employees are required to be familiar with it and comply with its provisions.

Magyar Posta Insurers have a Code of Conduct, which includes regulations on corporate culture, expected and unlawful behaviours, and also encompasses

the organisation's objectives and beliefs. Sustainability principles have been incorporated into the Code of Conduct, which Magyar Posta Insurers take into account in their daily operations. Magyar Posta Insurers do not have a separate business conduct policy; the Code of Conduct records the behaviours expected from employees.

In addition, the Organisational and Operational Regulations of Magyar Posta Insurers provide a detailed presentation of the general conditions of the organisations' operations, the functioning of the work organisation, and the general principles of the Company's representation. Members of the Board of Directors of Magyar Posta Insurers, as the executive body, and employees are also expected to comply with the highest level of business ethics.

At Magyar Posta Insurers, annually recurring mandatory training is prescribed for all employees regarding expected and unlawful behaviours and their recognition. The training covers the management of risks arising from unlawful conduct and the applicable procedures. Completion of the training is certified by an examination. Magyar Posta Insurers have a separate Training Policy in place.

As demonstrated by the extensive internal regulatory system, the entire Company is committed to ensuring compliance with regulatory requirements and considers it important to establish and maintain appropriate internal organisational standards. The Company's commitment to conducting business in a corruption and bribery-free manner is also laid down in the Code of Ethics, and it condemns all forms of corruption, whether directly or indirectly related to the activities of the Group or its business partners. The Company conducts process-integrated checks to identify corruption risks. The Company has Anti-Corruption Guidelines regarding the rules of procedure, which are also available on the [Company's website](#). No functions have been identified within the Company as being most at risk from corruption and bribery (except at Magyar Posta Insurers, as new subsidiaries, where the most at-risk functions are in the claims settlement and sales areas). The Company gives equal attention to all areas.

For Magyar Posta Insurers, the applicable regulation is the Compliance Policy, addresses anti-corruption and anti-bribery guidelines and rules as a highlight-

ed compliance risk which in a separate chapter. These corporate regulations and procedures can be aligned with the UN Convention Against Corruption, with the directive including focus points consistent with the Convention, such as transparency, independence, and accountability. The development of internal rules, training, measures, and procurement practices aimed at preventing corruption is in line with the UN Convention Against Corruption.

Gránit Biztosító has its own Code of Ethics, which applies behavioural rules that establish the expected mindset and attitude. Gránit Biztosító has its own Code of Ethics because the characteristics of its activities differ from those of other members of Waberer's Group (except for Magyar Posta Insurers) and because it operates in a different industry, thus it was necessary to define the expected behaviours and principles from the perspective of Gránit Biztosító in a separate form.

To ensure lawful and prudent operation, the Company operates a whistle-blowing system (note that for Gránit Biztosító, a separate whistle-blowing channel has been established, accessible to all employees of Gránit Biztosító via the intranet, and its operation is defined by the "Rules for the use of the anonymous complaints reporting system" policy). Employees of the Company, contractual partners, and any person who has a legitimate interest in making the report or in remedying or terminating the conduct that is the subject of the report are entitled to make a Group report. The individual who is a victim of misconduct can submit a complaint in the manner detailed on the Company's [website](#), in accordance with the provisions of the Whistle-blowing Policy. The purpose of the whistle-blowing system is to provide an appropriate reporting forum and procedure for cases of behaviour by employees that violate ethical workplace conduct rules. The whistle-blowing system enables the detection, sanctioning of misconduct, and the establishment of corrective measures. The Company establishes and maintains secure reporting channels that are capable of preventing retaliatory measures against the whistle-blower. The investigation procedure for whistle-blowing is in accordance with the provisions of the relevant labour, civil, and criminal laws. The Company places great emphasis on maintaining contact

with the parties involved regarding the reports. The effectiveness of contact lies in ongoing communication, regular face-to-face visits and annual customer satisfaction surveys, as well as biennial employee satisfaction surveys. The Company handles the suggestions, requests and complaints it receives and incorporates them into its day-to-day operations. The procedure is detailed in the policy entitled Policy on Handling Reports of Violations of Ethical Conduct and Abuses.

At the Polish subsidiary LINK Sp. z.o.o, a separate whistle-blowing system is in place, regulated by the Whistle-blower Policy, with the Reporting Coordinator as the responsible person. LINK ensures that the reporting person can make their complaint under secure conditions, without personal appearance. The protection of the whistle-blower is ensured, and their personal data is treated confidentially. The LINK Sp. z.o.o. whistle-blowing system can be used by both external and internal parties.

For internal reports, employees must first report any cases related to corruption or misconduct to their team leader, who forwards the observation to their superior, and this person then notifies the Board of Directors of the notification. Team leaders and managers are responsible for preventing and detecting suspected cases of corruption or misconduct, as well as for adhering to and familiarising employees with the regulations governing the acceptable and permissible level of business gifts. Magyar Posta Insurers have their own internal whistle-blowing system in place. The reporting system is accessible through multiple communication channels, allowing reports to be made verbally, in person or by phone, or in writing via post or electronic mail. The communication channels also allow for anonymous reporting. To protect the whistle-blower, the content of the report may only be known to the Compliance and Quality Assurance Manager receiving the report, and other persons may only be involved to the extent absolutely necessary for the successful conduct of the investigation. Employees can learn about the availability and operation of the reporting system through regular training sessions and occasionally through newsletters and informational materials sent out by the Compliance/Quality Assurance department.

The investigation is always conduct-

ed by the Compliance and Quality Assurance Manager, who is organisationally independent and reports directly to the management. In the event of personal involvement of the Compliance and Quality Assurance Manager, the CEO decides on the person leading the investigation. The principles and basic rules of the procedure are set out in the internal policies of Magyar Posta Insurers, which are accessible to all employees. These rules specifically address provisions for the protection of the whistle-blower and establish, as a fundamental principle, that the whistle-blower acting in good faith may not suffer any disadvantage due to their report. There are 30 days available to conduct the investigation in accordance with legal regulations. The Compliance and Quality Assurance Manager informs the management and/or supervisory bodies of Magyar Posta Insurers about the results of the investigations and, if necessary, initiates the involvement of the authorities.

At Gránit Biztosító, the document titled Anti-Fraud Policy, and Regulations for the Prevention and Management of Frauds summarises the methods for avoiding internal (external and internal) fraud attempts within the organisation. Fraud can take on many forms, from intentional damage to financial interests to corruption and falsification of financial statements. The policy defines the guidelines for preventing and identifying fraudulent activities, the action plan, tasks, responsibilities, and the procedure to be applied in the event of detected fraud. In the insurance sector, strict regulations apply to the Company, which are detailed in the Gránit Biztosító Fraud Prevention Policy. Gránit Biztosító is committed to preventing and detecting fraud to protect its clients and its own financial assets. It demonstrates zero tolerance towards fraud or attempted fraud against clients or Gránit Biztosító, meaning it does not differentiate between perpetrators of external or internal fraud. Gránit Biztosító strives to increase the fraud awareness of its employees and clients by all possible means and also seeks to identify potential fraud or abuse cases through software. In the event of suspicion of fraud or misconduct, it cooperates with law enforcement agencies, authorities, the MNB, and MABISZ (Association of Hungarian Insurance Companies). The policy defines the concepts of external and internal fraud, significant frauds, pre-

ventive measures, and procedures to be applied upon the detection of fraud. Gránit Biztosító considers the following areas to be at risk of fraud:

- claims settlement
- control over bank accounts
- large-amount transfers
- changes in asset management portfolios resulting in losses that cannot be justified by normal investment activities (e.g., unjustified sales of investment instruments)

If an anonymous report of a suspected case of corruption or misconduct is made at the Company, the provisions of the Policy on Handling Reports of Violations of Ethical Conduct and Abuses, as well as the Anti-Corruption Guidelines, are applicable for the protection of the whistle-blower. The person making an anonymous report, if their identity is established, is entitled to full protection for the appropriate conduct of the procedure. The personal data of the whistle-blower and other data enabling the establishment of their identity may only be disclosed with the express consent of the whistle-blower, which procedure is in accordance with the relevant data protection provisions and the GDPR. In cases of violations of ethical workplace conduct norms, the forum entitled Committee for Ethical Work Conduct (CEWC) is authorised to proceed, and in cases of economic misconduct, this forum is supplemented with additional participants.

- The Committee for Ethical Work Conduct (CEWC) takes action, whose members include the Company's HR Director, external labour lawyer, and the Head of Internal Audit;
- In cases of economic misconduct and abuse, in addition to the Company's HR Director, the Legal and Compliance Director, and the Head of Internal Audit, the committee must invite the professional leader necessary for the substantive assessment of the given report. Among the committee members, the member whose organisational unit is affected by the report is excluded from the procedure to ensure objectivity.

The Head of Internal Audit reports regularly (quarterly) to the Supervisory Board on the reported whistle-blowing cases and their consequences and experiences. These processes are regulated by the Policy on Handling Reports of Violations of Ethical Conduct and Abuses.

Regarding violations of ethical workplace conduct, the investigating committee is-

sues sensitising internal communication pre-agreed with the management to the

Company's employees.

#### 4.1.4 [G1-2] MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

**In its Procurement Policy, the Company defines the standards to be applied during procurement procedures with business partners at the Group-level (except for the subsidiaries indicated in the above table).**

In addition to improving the efficiency of procurement procedures and the supply of goods and services, the policy contributes to enhancing the transparency of procurements, the fairness of competition, and the appropriate management of risks in individual procedures, thereby helping the Company achieve the most technically and economically favourable contractual terms. The Company does not have a policy aimed at preventing late payments to small and medium-sized enterprises, but it provides a supplier factoring<sup>58</sup> option, participation in which is the decision of the respective small and medium-sized enterprises.

The Company does not have a separate policy aimed at preventing late payments. The Company records the payment terms in the contracts concluded with suppliers, and the payment of supplier liabilities typically occurs by the deadline. Further details are contained in the chapter **[G1-6] Payment Practices**. The Company treats all its suppliers equally during the selection process. During the business relationship, any differentiation is based solely on professional competitiveness, transparency, and compliance with legal regulations, and from 2024, sustainability aspects are also considered during the procurement process.

Transparent business conduct aspects also appear in the process of requesting quotations and contract conclusion, and the Company places great emphasis on these. The compliance-oriented screening of business partners occurs annually, while the qualification of subcontractors is conducted along the General Terms and Conditions. The selection of subcon-

tractors is carried out through a qualified, screened online carrier platform, taking into account the rules set out in the CEO Order. During the qualification process, the Company requests and verifies the corporate documents of potential subcontractors, existing insurances, and conducts further evaluation procedures to assess the risks associated with the partner. Subcontractors are required to familiarise themselves with and sign the Code of Ethics. Based on their qualification, they can be categorised into different statuses, and by completing trouble-free transports, a higher classification can be achieved. At the same time, there is also a blacklist in place, on which a subcontractor may be placed in the event of serious complaints or significant problems.

The Company's Procurement Policy summarises the supplier practice related to sustainability issues in several sections. The Company intends to select suppliers where, during the mapping of the supply chain, it is ensured that they have appropriate financial, professional, and ethical foundations, thereby being able to consistently perform at the expected level in terms of defined quality and quantity. During its procurements, the Company applies positive discrimination in favour of those suppliers who, with identical technical, quality, and economic performance, implement a higher level of environmental culture and provide their products and services with lower energy consumption and lower emissions. The Company develops processes for procurement procedures during which products, services, and investments are consciously ordered that place less burden on the environment

during their lifecycle and facilitate the implementation of a circular economy.

The Company is committed to ESG aspects and expects the same approach from its suppliers as well. If information arises suggesting that a supplier's activities could potentially have a negative impact on the Company, it initiates consultation with the party concerned and takes measures to appropriately address the issue.

The goal is that in 2025, with regard to the Hungarian ESG Act<sup>59</sup>, this supplier traceability will improve and take on a more structured form compared to the current practice. For this, the introduction of appropriate software and the development of a new procedure in accordance with the provisions of the Hungarian ESG Act are essential. Since the legal requirements were definitively clarified in 2024, the Company may implement actual introduction and the necessary measures in the first half of 2025. Simultaneously, ESG policy provisions applicable to suppliers will also enter into force.

The Company's Competition Law Policy contains further provisions for the purpose of transparent business conduct and fair competition.

The procurement policy of Gránit Biztosító is summarised in the procedure set out in the CEO Order entitled Rules of Procedure of the Procurement Process. The rules of procedure extends to the ordering of all goods or services above the amount limit specified in the order. The supplier screening currently does not include ESG criteria, but due to the industry's characteristics, there are few procurements anyway.

The Polish subsidiary, LINK Sp. z o.o., also provides its suppliers with the opportunity to participate in a supplier factoring programme, which operates within the framework of a supplier factoring programme. Additionally, the company has

<sup>58</sup> During factoring, the factoring company purchases overdue or not yet due receivables, allowing the supplier to immediately receive the consideration without having to wait, for example, for 60 or 90-day payment deadlines. In this case, the buyer will pay the consideration to the factoring company by the payment deadline specified in the contract. This primarily creates a favourable financial service for small and medium-sized enterprises, improving their liquidity.

<sup>59</sup> Act CVIII of 2023 on the Rules of Corporate Social Responsibility Taking Into Account Environmental, Social and Societal Aspects, to Promote Sustainable Financing And Unified Corporate Responsibility, and Amending Other Related Acts

guidelines in place regarding supplier relations.

Waberer's Slovakia S.R.O. and Waberer's Romania S.R.L. currently do not have a procurement policy. In the case of the Slovak subsidiary, the reason is that until the end of the 2024 business year, it was a company serving a single customer; however, with the expansion of its operations, the Company needs to reassess the subsidiary's role within the Group and the possibility of bringing the Slovak subsid-

iary under the scope of the Group's Procurement Policy. The Romanian subsidiary conducts relatively few procurements, but channels these to the parent company, and they work together to find the most optimal solution. Based on these, it is justified to consider extending the Group procurement policy to the Romanian subsidiary. Waberer's Romania S.R.L. follows Group procedures in the selection of subcontractors, procurement needs are managed centrally with the help of a Group

contact, ensuring a smooth process without language barriers. Waberer's Slovakia S.R.O. works with a few selected partners from whom they order products and services throughout the year. Currently, they do not have an official policy in place for relationships with suppliers, but procedures are carried out according to the instructions of the responsible manager. The documentation of regulatory frameworks is planned for 2025.

## 4.1.5 [G1-3] PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

**The Company's Anti-Corruption Guidelines are published on its [website](#), and its expectations and positions are publicly accessible.**

The Company has the so-called Conflict of Interest Policy, a Whistle-blowing Procedure, and a Policy on the Accounting of Business Travel, Representation, and Business Gifts in place, all of which include anti-corruption expectations and behavioural guidelines.

The Company not only expects its own operations to comply with the rules of fair business conduct and to avoid corruption, but also requires its business partners to do the same. The Company conducts process-integrated checks to identify corruption risks, which are as follows:

- fuel thefts,
- personal relationships between purchaser and supplier,
- subcontracting,
- declaration of conflicts of interest,
- implementation of real estate developments,
- regulatory compliance,
- cigarette smuggling in international transport.

The objective of the Anti-Corruption Guidelines is to prevent and reduce corruption within the Group. The Company has identified five areas where corruption cases may arise and has taken steps to reduce the risk exposure of these areas:

- business relations with partners,
- relations with government bodies,
- prevention and combating of money laundering and terrorist financing,
- signing for the Company and remittance,
- and business gifts.

Reported cases suspected of abuse – in-

cluding corruption cases – are investigated by the Head of Internal Audit, and the proposal for applicable legal consequences, depending on the subject of the report, falls within the competence of two independent committees as detailed previously. Further detailed information is available in the sub-chapter **[G1-1] Corporate culture and business conduct policies and corporate culture.**

In the case of Magyar Posta Insurers, suspected corruption incidents are reported by the respective departments or individual employees to the Compliance and Quality Assurance Manager, who investigates the incident according to the rules of procedure defined in the relevant policies. The Compliance and Quality Assurance Manager actively participates in prevention through the organisation of training sessions, consequently, in the case of Magyar Posta Insurers, the persons responsible for preventing corruption and those investigating such cases are not completely separate. The Compliance and Quality Assurance Manager informs the management and/or supervisory body of Magyar Posta Insurers about the results of the investigation of suspected corruption cases.

In the case of Magyar Posta Insurers as well, there is an option for anonymous reporting through the internal whistle-blowing system. The method of investigation is independent of who the report was directed at, including whether the person concerned is an employee, business partner, or other stakeholder.

Regarding Waberer's Slovakia S.R.O., the relevant CEO Order in force at the Company also applies to the Slovak subsidiary. Furthermore, the Company intends to provide access to the Group whistle-blowing platforms for the Slovak subsidiary in the future, although due to language barriers, this system is currently less accessible to them. The implementation schedule depends on the necessary capacities, the time required for translation, and the IT systems. Currently, Slovak staff can report suspicions related to corruption or abuse to their direct supervisors. As it is a relatively small company, this has not caused any problems so far.

Various policies (e.g., Code of Ethics, Procurement Policy, Conflict of Interest Policy, Whistle-blowing Procedure) are issued within the organisation in the form of CEO Orders. Partners of the Company can access the Code of Ethics, Anti-Corruption Guidelines, Whistle-blowing Procedure, Disclosure Guidelines, Guidelines on the Prohibition of Insider Trading, Responsible Corporate Governance Report, and the Remuneration Policy for the members of the parent company's board on the Waberer's International Nyrt. [website](#). However, the majority of the Group CEO Orders are made available by the Company exclusively to its own employees, concerning internal procedures.

Employees of the Company are required to participate in online anti-corruption and anti-bribery training every two years. The Company regularly monitors the completion of anti-corruption and anti-bribery training (information on the training can also be seen in tabular form in Section 4.1.6).

LINK Sp. z.o.o. currently does not provide separate anti-corruption training, but employees participate in a training upon entry that focuses on familiarising them with the content of the Code of Ethics. This training includes anti-corruption expectations and statements condemning corruption.

Waberer's Slovakia S.R.O. currently does not have its own anti-corruption training, but in the future, the extension of Group training (e-learning) to this subsidiary is under consideration. For this, the training material needs to be translated into Slovakian.

Waberer's Romania S.R.L. does not have separate anti-corruption training in place either. At this subsidiary, there are no language barriers to completing the Group training material, and the Company plans to extend the anti-corruption training to this subsidiary in the future.

Gránit Biztosító currently does not have anti-corruption training.

At Magyar Posta Insurers, employee training on anti-corruption and anti-bribery is conducted as part of compliance training. The training is mandatory for all employees every year, regardless of their position at Magyar Posta Insurers, mean-

ing that the board and governing bodies also receive the same training. In addition to the current topics, the training covers the most important regulations and procedural rules, including the operation and accessibility of the whistle-blowing system. The training concludes with an online exam, the successful completion of which is a prerequisite for completing the training. The training covers 100% of the functions exposed to risks (claims settlement and sales areas), as it is mandatory for all employees.

## 4.1.6 [G1-4] CASES OF CORRUPTION AND BRIBERY AND PREVENTIVE MEASURES

In the 2024 financial year, there were no incidents related to corruption at the Company, thus the amount of related fines is zero (0).

One of the key objectives according to the Company's Anti-Corruption Guidelines and the separate Rules of Procedure on Corruption and Bribery of Magyar Posta

Insurers is the prevention and reduction of corruption and bribery within the Group, therefore, it expects its employees to complete anti-corruption and anti-bribery

training (the previous section mentioned the subsidiaries where there is still no separate anti-corruption and anti-bribery training in place).

Number of employees participating in the anti-corruption training organised by the Company:

Participating subsidiary	NUMBER OF EMPLOYEES PARTICIPATING IN THE TRAINING	
	Female	Male
Delta-Rent Gépjármű-Hasznosító Kft.	1	2
Nexways Cargo Kft.	0	0
All in One Transport Kft.	0	0
Rapid Teherautó Szerviz Kft.	2	6
Waberer's International Nyrt.	193	250
Waberer's Network Kft.	17	14
WSZL Automotív Kft.	52	55
WSZL Szállítványozási és Logisztikai Kft.	133	157
<b>Total</b>	<b>398</b>	<b>484</b>

Based on the results of the 2024 double materiality assessment, the Company will review its ESG Strategy, in which it can now define even more detailed actions along the identified material sustainability topics. Among the strategic goals set at the beginning of 2024, seven strategic

sub-goals can be linked to the prevention of corruption:

- ensuring compliance with regulatory requirements,
- following industry standards and recommendations recommended for insurance companies,

- corporate governance principles recommended for public companies,
- compliance with internal organisational standards,
- establishing ESG governance at group level,
- strengthening stakeholder relations,

- increasing transparency and accountability

Among the measures to prevent corruption and bribery, it should be mentioned that the Company specifies the value of business gifts that can be given and/or accepted by employees in internal instructions (Procurement Instruction and Business Travel, Representation and Business Gifts Instruction). The scope of key measures (internal instructions, policies, and the ESG strategy under revision) extends to the Company's employees, clients, and business partners.

Magyar Posta Insurers have an annual-

ly recurring training, mandatory for all employees, to prevent corruption and bribery. The content and scheduling of the training are determined by the Compliance and Quality Assurance department in collaboration with the HR department. The trainings are scheduled by reviewing the regulations and taking account of newly enacted or upcoming legal regulations. In addition to the training, Magyar Posta Insurers plan to send out informational materials to employees on an ad-hoc basis, responding to specific current issues. As part of the integration into the Group, the extension of regulations and strategies

applicable to the entire Company (such as the ESG Strategy and Anti-Corruption Guidelines) to Magyar Posta Insurers is planned, thus in the long term, they will follow principles and measures uniformly applicable to the whole of the Company.

Currently, there are no dedicated funds at the Company for organising anti-corruption training or for the prevention and detection of other corruption and bribery-related incidents, as these are directly accounted for in the respective areas (e.g., HR training costs). The Company may consider the separate management of ESG-related costs in the future.

## 4.1.7 [G1-5] POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

**The Company does not engage in regulated lobbying activities in the classical sense, i.e., activities related to direct political influence.**

Based on this, the Company has not provided any direct or indirect financial or in-kind political contributions to any party. However, it actively participates in various industry organisations in the transport-freight forwarding and insurance sectors, which may indirectly influence industry legislation. Through collaborations with professional organisations (Hungarian Road Transport Association-MKFE and the Association of Hungarian Insurance Companies-MABISZ), they represent the transport and insurance industry with their professional standpoint on relevant legal issues.

LINK Sp. Z.o.o. does not engage in traditional lobbying activities, but is a member of the professional organisation Stowarzyszenie Przewoźników Drogowych TRANS (TRANS Road Transport Association).

During the financial year, the Company paid the membership fee determined by the professional organisations. The primary purpose of the membership fee is to ensure the operation of the organisation and maintain advocacy. In return, the Company receives numerous services, such as regular informational newsletters on transport and logistics issues, changes in legal and technical conditions, and up-to-date information on traffic restrictions on the roads of Hungary and Europe.

Among the foreign subsidiaries, Waberer's Romania S.R.L and Waberer's Slovakia S.R.O do not engage in lobbying activities and do not cooperate with professional advocacy organisations. Consequently, they also provided no direct or indirect financial or in-kind political contributions in 2024.

As a publicly traded company introduced to the regulated market of a state party to the Agreement on the European Economic Area, the Company is considered transparent by law (Section 3(1) of Act CXCVI of 2011 on National Assets). Shares issued by Waberer's International Nyrt. are traded on the Budapest Stock Exchange (BSE). Further information is available on the BSE [website](#). Magyar Posta Insurers and Gránit Biztosító are also listed in the register of the Magyar Nemzeti Bank, and the registration numbers are available on the websites of the respective entities. Waberer's Slovakia S.R.L, Waberer's Romania S.R.O, and LINK Sp. z.o.o. are not listed in any other transparency register beyond the mandatory EU central beneficial ownership register.

In accordance with the provisions of the Civil Code, the Company's employees must declare the exclusion of conflicts of interest by completing a conflict of interest declaration. The Company does not have any executive or supervisory board

members who have held a similar position in public administration in the past two years, except for Magyar Posta Biztosító and Magyar Posta Életbiztosító, where the CEO was a ministerial commissioner until 2024, and a member of the Supervisory Board works at the Ministry for National Economy.

In Hungary, there is no culture of institutionalised political lobbying, and the legal framework for lobbying activities is already covered by laws related to corruption and transparency (in Poland this is covered by a separate law). The Company's Code of Ethics is sufficient for managing lobbying activities, and reputational risks can also be adequately managed with other corporate governance tools, thus the Company has not adopted separate measures related to political influence and lobbying activities, does not have applicable policies and does not plan to create such documents. The Company represents its professional interests in all cases through professional organisations, in a regulated and transparent manner, during which it fully complies with the expectations set by the Code of Ethics.

### 4.1.8 [G1-6] PAYMENT PRACTICES

The regulations regarding the Company’s payment practices are contained in the Procurement Policy, the Remittance Policy, and the contracts concluded with suppliers.

The policy defines the method of payment, the payment deadline – in the case of accepting a payment deadline shorter than 60 or 30 days, the necessary approv-

al steps –, the rate of late payment interest, and the preferred invoicing method. The payment deadline specified in specific cases is determined during contracting with suppliers, typically ranging between 3 and 98 days.

	PAYMENT DEADLINES
Transport subcontractors	45 days
Other/service providers	0-60 days

The Company distinguishes the following main supplier categories:

- strategic partners,
- subcontractors,
- other partners.

Typically, 75-85% of procurements are from strategic suppliers. The remaining 15-25% of procurements were typically one-off orders from small and medium-sized enterprises in the 2024 financial year. The Company settled 90% of its incoming invoices by the payment deadline. 10% of the Company's invoices were paid late, typically due to late receipt/arrival of the invoice or complaints. The Company initiates a larger volume of supplier payments once a week, therefore, when determining late payments, it only takes into account supplier invoices overdue beyond seven days.

At the LINK Sp. z.o.o. subsidiary, payment delays are not typical; however, if they occur, the company's accounting department justifies them based on analyses prepared monthly. At LINK Sp. z.o.o., payment deadlines may vary by contract. Several supplier categories can be distinguished at the Polish subsidiary, as follows:

- Transport and logistics suppliers: these are typically small and medium-sized enterprises, representing 60-70% of trade payables at LINK. A 60-day payment deadline generally applies to these suppliers according to the contracts.
- Fuel suppliers: these represent 20-30% of trade payables at the Polish subsidiary, with varying payment

terms per supplier, always a matter of agreement.

- Shipping companies: these account for 2-5% of trade payables, and the payment terms depend on the contract agreements concluded.
- Other suppliers: these are typically small and medium-sized enterprises, accounting for 5-10% of trade payables. Payment deadlines generally range between 14-60 days, depending on the goods procured or services utilised.

At Waberer’s Romania S.R.L, a fixed 45-day payment deadline is established in contracts for transport suppliers. 73.52% of trade payables are settled on time.

Waberer’s Slovakia S.R.O currently does not maintain continuous records of the proportion of supplier invoices paid by the deadline. No legal proceedings related to delays are in progress.

Gránit Biztosító’s payment practices differ from the Company’s other subsidiaries due to the different operating industry and strict regulatory requirements. The Order of Procurement Process policy details the conditions and obligations undertaken by Gránit Biztosító. The number of claims payments to clients exceeds ten thousand annually. Gránit Biztosító typically (in more than 95% of cases) settles its procurement and claims-related payment obligations by the payment deadline. In claims settlement cases, the payment deadline is 15 days from the receipt of the last document; in other cases (procurement), it is the deadline agreed in the contract with the supplier of specified in

the invoice. This latter is strictly adhered to, as specifically required by the MNB.

Magyar Posta Insurers typically (94.7%) settle their trade payables in line with general payment terms. The average duration required to settle invoices from the start date of the contractual or statutory payment deadline period, calculated by simple arithmetic average, is -1.75 days, and by weighted average, -0.81 days. It is not typical for invoices to be paid after the payment deadline has expired.

There is currently no ongoing legal proceeding for late payment at any of the Company’s subsidiaries.

## 4.2 [G-ENTITY-SPECIFIC] DATA SECURITY AND DATA PROTECTION

The Company is committed to consistently complying with the General Data Protection Regulation (GDPR) in relation to the processing of personal data, both within the organisation and in relation to customers and partners.

The Data Processing Notice is publicly available on the [Company's website](#), and the Company also has a Privacy Policy, which applies to all subsidiaries. At the Company, data is stored only in information systems protected by access controls. For non-digitally stored data, physical security controls are of paramount importance to ensure their security and confidentiality. If it becomes necessary to download the data, the Company applies an additional security measure: it anonymises the customer or employee data, replacing it with a unique code, thus preserving the security of the data. Where possible, the data medium is encrypted, so that the data is only accessible with the appropriate encryption key. The Company carries out periodic and planned security tests involving ethical hackers and security professionals. As a result, the security of the data is constantly under review, system vulnerabilities are quickly identified and remedied through an action plan, strengthening the reliability and resilience of the systems. Employees receive regular information security training, thereby the Company provides ongoing support to help them identify and report information security risks. In 2024, a report concerning a data protection aspect was received from an external party, and an inquiry from the authorities, which is currently under investigation. In addition, no complaints have been received from customers or other organisations by the Company. There have been no customer data leaks, data thefts, or data losses in 2024.

The data protection policy of the LINK Sp. z.o.o. subsidiary also includes cases when personal data is collected and stored from customers and partners, and specifies what types of data these may be. The processing of personal data can only occur if the customer or partner has consented to such processing (for example, during a visit to the website, pursuant to a contract), or if the processing and

controlling is necessary for some legal interest. Personal data may be made accessible by LINK Sp. z.o.o. to a third party (for example, to the parent company) if the data provision is legally mandatory, or if the data provision is ordered by a court to prevent, investigate, or detect any legal violation or infringement.

Based on the results of the double materiality assessment, data security and data protection reached the materiality threshold primarily in the insurance segment and was included in this report as an entity-specific topic. The reason for this is that in this sector, the clientele also includes private individuals, the protection of whose personal data is of paramount importance. Accordingly, the fulfilment of disclosure requirements will be detailed further in relation to Gránit Biztosító, Magyar Posta Biztosító Zrt., and Magyar Posta Életbiztosító Zrt.

Gránit Biztosító processes the data of tens of thousands of individuals and several thousand legal entities. Beyond trade secrets and confidential insurance information and the GDPR legal requirements, the data security of clients is of paramount interest. Gránit Biztosító operates along extensive data security regulations and mechanisms, which are essential for legal compliance. The unauthorised leakage of client data to a third party carries a severe reputational risk, leading to a loss of trust and consequently a decrease in future cash flow. However, the likelihood of data security incidents occurring is extremely low due to the strict regulations characteristic of the sector.

Magyar Posta Insurers also necessarily handle the personal data of their clients, which are related to the insurance contract, its conclusion, registration, and the service itself. For Magyar Posta Insurers, it is of utmost importance to comply with domestic and EU legal requirements during the processing of personal data, and to ensure the confidentiality, integrity, and

availability of the personal data of their clients, partners and employees. The objective of Magyar Posta Insurers is to ensure protection against data theft, data leakage, and data loss, as well as to prevent damage to the company's good reputation and to safeguard confidential insurance information. Every year, Magyar Posta Insurers evaluate and review compliance risks (data protection risks), impacts, and the records of data processing activities under the GDPR, which includes mapping the data processing processes carried out by Magyar Posta Insurers and examining compliance with data protection requirements by the relevant departments.

The Data Protection and Data Security Policy defines the data protection tasks arising during the activities of Gránit Biztosító. Further guiding policies include:

- Password management for technical users,
- IT and information security policy, and
- Data deletion and anonymisation policy.

Contractual agreements with business partners cooperating with Gránit Biztosító can only be concluded with the acceptance of the company's data protection provisions and rules.

The financial resources allocated for data protection appeared within the IT budget of Gránit Biztosító in the 2024 financial year. The costs covered tasks related to data protection and IT system security, as well as data protection and IT security training organised by Gránit Biztosító and the distribution of newsletters to employees. In addition, the following data protection measures were implemented in 2024:

- introducing new VPN connection technology and stricter identification protocols,
- conducting vulnerability assessments revealed during the monthly IT audit,
- implementing corrective measures after "hardening" findings (mapping system deficiencies and security gaps) to minimise weak points in the IT system.

Magyar Posta Insurers also ensure the fulfilment of data protection tasks by using various data processing and data securi-

ty processes, tools, and solutions. These tools and solutions include:

- internal policies related to data protection in force at Magyar Posta Insurers,
- the use of a closed IT system to prevent data leakage, and relatedly, the creation of security backups and logs,
- the use of firewalls and encryption software,
- defining different privilege levels for processing personal data,
- the existence of a strict access control system,
- maintaining detailed and accurate records of data processing activities performed,
- ensuring appropriate information provision
- and strictly regulated contracting processes.

The Data Protection and Confidentiality Policy, Outsourcing Policy and Regulations, IT Security Risk Management Policy, and other data protection and information security-related policies of Magyar Posta Insurers include the steps preceding the introduction of new processes and the modification of existing processes related

to data processing, which cover the assessment of impacts and risks related to data processing activities, as well as the due diligence and risk assessment of the partners of Magyar Posta Insurers. Magyar Posta Insurers continuously monitor and utilise feedback from clients and partners, and also use experiences from the exercise of data subject rights and personal data breaches in the creation, modification, and review of data protection-related policies, instructions, and strategies. Magyar Posta Insurers do not allocate separate financial resources for data protection; these expenses are allocated within the budgets of other departments (IT, Compliance). Magyar Posta Insurers conduct annual data protection and information security awareness training and examinations for all new and existing employees, and inform their employees about the most important data protection and data security challenges and risks in the form of newsletters.

The primary objective of Gránit Biztosító is to improve identified but low-level risks and eliminate risks by the deadline set. One of the procedures employed by Gránit Biztosító to support this is ongoing

vulnerability assessment, which is evaluated according to its risk management methodology. Gránit Biztosító's ESG objectives currently do not include measurable key performance indicators.

Magyar Posta Insurers typically measure data protection targets and achieved results with the following metrics:

- Number of exercises of rights/data protection-related complaints by data subjects, number and severity of identified deficiencies, response time
- Number and severity of personal data breaches and their handling time
- Number of risks identified during audits, severity of identified risks and duration of correction
- Number of data protection developments and implementation time
- Number and severity of cases in the data leakage prevention system (DLP)

For measuring the metrics related to the targets and achieved results, Magyar Posta Biztosító applies risk classifications and impact analyses, which are documented in monthly, quarterly, semi-annual, and annual reports.

## 4.3 [G-ENTITY-SPECIFIC] RISK MANAGEMENT

The Company is committed to identifying, assessing and managing risks in its business activities in order to deliver stable and profitable performance, and create value for shareholders.

Taking into account the potential negative consequences is, therefore, an integral part of the day-to-day operational as well as strategic long-term decision-making process. The primary objective of the Company's risk management process is to understand the risks and their potential impact. The Company recognises that in most cases, it is not possible to eliminate risks, and therefore prefers to mitigate and manage the negative impact of risks effectively. Accordingly, the Company will only take on any risks after proper assessment and effective management of the impacts and, where possible, mitigate the likelihood and impact of these risks through internal control reviews and process controls. For each key activity, project or other aspect, the relevant risks that could have a significant impact on the company's operations are identified and

assessed as accurately as possible. Further information can be found in the consolidated financial statements.

During the double materiality assessment, this entity-specific topic was also identified as a material topic for the insurance business (as a financial risk), and thus it will be elaborated in detail concerning Gránit Biztosító and Magyar Posta Insurers along the disclosure requirements. This arises from the fact that the soul of insurance, as a business line, is essentially the risk profile itself. In addition to the above, at Group-level (including the transport-logistics area), the identified risks are continuously monitored by Internal Audit, a process briefly described in Chapter 1 of the Sustainability Report in the sub-chapter entitled **[GOV-1] The role of the administrative, management and supervisory bodies.**

The foundation of Gránit Biztosító's operations is the effective management of emerging risks. The insurance sector is a strictly regulated area in which the Company possesses a high level of risk management preparedness. Through its risk management activities, Gránit Biztosító shares risks and ensures the minimisation of the negative impacts of potential loss events through reinsurance.

The risk management area, as part of Gránit Biztosító's internal defence system, strives to establish a risk awareness that, in line with Gránit Biztosító's risk appetite and risk tolerance level, ensures the identification, measurement, monitoring, and management of emerging risks so that the extent of risks does not endanger continuous, transparent, and secure operations.

In the case of Magyar Posta Insurers, the risks that arise and need to be managed may differ for the life insurance and non-life insurance businesses. Magyar Posta Insurers are committed to effective risk management to ensure the fulfilment of their corporate governance obligations.

The goal of Magyar Posta Insurers' risk management system is to ensure alignment between the risk management process and the objectives of Magyar Posta Insurers, also taking ESG risks and aspects into consideration. Furthermore, a key objective for Magyar Posta Insurers is to develop and operate effective and consistent approaches and methods for identifying, analysing, managing, monitoring, and reporting the risks affecting them. They also aim to ensure that informed decision-making by the Board of Directors is based on up-to-date and reliable information, which is always in line with Magyar Posta Insurers' risk appetite.

Magyar Posta Insurers consider the assessment of identified risks and the examination of the potential impacts of risk management processes to be important. The evaluation of risks is conducted in several systems, which are as follows: Standard Formula calculation, ORSA system, Individual risk assessment. The most significant identified risks are:

- increase in storm damage (non-life insurance risk);
- in the life insurance business, for example, the risk of cancellation in life insurance, strategic risk (such as the extension of the extra profit tax to 2025), market risk;
- in the life insurance business, for example, the risk of cancellation in life insurance, strategic risk (such as the extension of the extra profit tax to 2025), market risk.

The available capital (solvency capital) of Magyar Posta Insurers did not fall below the statutory minimum in the 2024 business year.

Risk assessment is conducted along well-defined rules, which are laid down in the Risk Management Policy in the case of Gránit Biztosító. The monitoring of the various significant risk categories (non-life insurance risk, health insurance risk, operational risk) is indirectly managed by Gránit Biztosító through the regular monitoring of the ratio of planned and gross earned premiums according to Hungarian accounting laws – at least once per calendar quarter.

According to Gránit Biztosító's risk management approach, risk management is the responsibility of all employees involved in the risk management process, with particular emphasis on the heads of the individual organisational units, who

act as risk officers in their respective areas. The task of the risk officers is to categorise risks, conduct risk analysis, and develop measures aimed at managing risks and risk accumulations by analysing the processes of their respective areas. Risk officers report monthly on the risk events that have occurred to the Risk Management Officer. The analysis and evaluation of the regular monthly reports is the responsibility of the Chief Risk Officer. A key role in risk management is played by the Chief Actuary and the Chief Financial Officer responsible for Gránit Biztosító's financial position and accounting system.

Magyar Posta Insurers have several risk management-related policies, which are listed below:

- Risk Management Manual,
- ORSA Policy;
- Credit Risk Policy;
- Data Quality Policy;
- Rules of procedure for completing supervisory data reporting and disclosure policy.

In the case of Magyar Posta Insurers, the listed risk management policies are reviewed annually. After the review by the person responsible for the policy, the controllers (leaders responsible for the topic) may comment on the amendments and also make suggestions. The policies can be submitted to management and board meetings after approval by the controllers. The risk management process fundamentally consists of the identification, analysis, classification, monitoring, reporting, and control of potential risks. The identification of risks is primarily the responsibility of the risk officers leading the individual organisational units. The aim of risk identification is for Gránit Biztosító to be aware of all threats. The Chief Risk Officer and the risk officers continuously gather information about the risks to which the company is exposed during its operations, whether they are existing, potential future, external, or internal risks. Thus, Gránit Biztosító's comprehensive risk inventory is continuously up-to-date, and in addition, the inventory is reviewed once a year. The created risk inventory is based on Gránit Biztosító's internal regulatory documents, ensuring that every regulated process is subject to risk assessment. The compilation and supplementation of the risk inventory are carried out by the Chief Risk Officer. During the identification of risks, the following risk areas and risk categories

are reviewed:

- environment (demand, asset and service provider markets, product and sales competition, customers, legal and regulatory environment)
- corporate governance (exercise of ownership rights, strategy, internal governance and internal control system)
- market presence (products, customers, handling of abuses)
- business processes and capital (financial and operational risks, capital and profitability).

Risk officers analyse the work processes in their respective areas to accurately determine the emerging risks and the related control activities. If, as a result of an external (e.g., MNB, auditor) or internal (e.g., internal audit, compliance, IT security officer, data protection officer) examination, a new, previously unidentified risk or a significant change in a previously detected risk arises, the affected risk officer is obliged to inform the Chief Risk Officer of this fact through the designated online platform.

For each risk – based on their own previous experiences, or in the absence of such, by estimation – the risk officer must also determine the expected average value of the financial loss in the event of the occurrence of the risk event.

The qualitative assessment of risk elements is primarily the responsibility of the risk officers. The evaluation of identified risks is initially conducted item by item, separately for each risk element, but for determining the most important risks for Gránit Biztosító, it is also necessary to explore the interconnections between individually assessed risks. Risk officers evaluate the severity (expected economic impact) and frequency of occurrence of identified risks on a five-point scale, and the detectability of the occurrence of the risk event on a three-level scale, at least once a year or in the event of changes in the processes they supervise.

Within the framework of the risk report, the heads of Gránit Biztosító's specialised areas (as risk officers of the respective area) respond to questions concerning risks arising within the examined time frame.

During the development and review of risk management policies, the perspectives of stakeholders are currently not considered, and no feedback has been requested from

stakeholders in this regard.  
Risks identified in relation to sustainability  
Physical risks

For Gránit Biztosító, the following physical risks have been identified based on the sub-chapter **[IRO-1] Description of the**

**processes to identify and assess material impacts, risks and opportunities:**

	IDENTIFIED RISK	TIME HORIZON
Acute physical risks	Storm damage risks	Significant in the short term
Chronic physical risks	Reduction of water resources Increase in average temperature Decrease in biodiversity	Significant in the long term

Gránit Biztosító defines storm damage risk related to property insurance as an acute physical risk. Storm damages are local events linked to specific weather events, during which precipitation intensity and/or wind strength significantly deviate from the average or are extreme. These two weather phenomena typically cause property damages. This risk has a direct impact on Gránit Biztosító's business results

and the property security of its clients.  
Gránit Biztosító identifies the increase in average temperature resulting from climate change, the reduction of water resources, and the destruction of biodiversity as chronic physical risks affecting the natural, social, and economic environment. Chronic physical risks do not directly affect Gránit Biztosító's operations or profitability; however, due to their long-

term social and economic impacts, they are treated as indirect risks.

Transition risks:

For Gránit Biztosító, the following transition risks have been identified based on the sub-chapter **[IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities:**

	IDENTIFIED RISK	TIME HORIZON
Political and regulatory risks	Geopolitical/energy crisis	Significant in the short term
	Tax policy risk	Significant in the short term
Technological risks	Alternative vehicle propulsion	Significant in the medium term
	Autonomous vehicle technology	Significant in the long term
Market risks	Increase in insurance premiums due to climate change	Significant in the medium term
	Transition pressure for logistics companies from road freight to rail transport	Significant in the medium term
	Changes in vehicle fleet and urban vehicle usage habits	Significant in the medium term

Gránit Biztosító identified energy and raw material crises arising from geopolitical changes, as well as the negative economic impacts of drastic changes in supply chains and trade relations, as political-regulatory risks. These impacts significantly influence the region's trade, thus they may directly affect one of Gránit Biztosító's main markets, the vehicle insurance market for transporters. We also evaluate changes in tax policy, both in terms of regular taxes on various services and sector-specific extra taxes, as political-regulatory risks.

Gránit Biztosító identifies the gradual phasing out of traditional, internal combustion, fossil fuel-based engine technology within the vehicle insurance portfolio, and the trends associated with the spread of alternative propulsion, as technological

risks.

We identify the transition pressure on logistics companies within Gránit Biztosító's MTPL (motor third party liability insurance) portfolio as a fundamental transition risk, considering the EU's zero carbon emission ambitions targeted for 2050. In determining and managing the impact of technological risk, Gránit Biztosító relies on the Group's ESG Strategy, in which the development of intermodal, rail transport replacing traditional road transport is formulated as a strategic goal. Another technological, and at the same time, regulatory risk is the impact of autonomous vehicle technologies on the insurance market.

A fundamental market risk is the increase in property insurance premiums necessary to cover damages resulting from climate change and environmen-

tal degradation, alongside a decrease in penetration. Gránit Biztosító identifies the change in vehicle fleet and urban vehicle usage habits in the direction of electrification and partly towards public transport and partly towards vehicle-sharing solutions as a market risk. This market risk primarily affects the motor third party liability insurance market and the CASCO market. Based on Gránit Biztosító's current portfolio, the liability risk arising from climate change and environmental degradation is not significant; however, in the event of a potential increase in corporate property insurance, it must be considered when developing business plans and underwriting policies.

For Gránit Biztosító, the Group's ESG Strategy outlines the risks and the planned responses to these risks for the

period up to 2027.

The risk management systems of Magyar Posta Insurers, i.e., the systems mentioned in the current sub-chapter [IRO], must meet both the internal requirements formulated in the form of a risk strategy and the external regulations. The fundamental external requirements are the legal regulations on corporate governance and the recommendations of the supervisory authority. The risk management process is the “core” of risk management. It is aimed at the systematic identification, evaluation, control, and reporting of risks. This constant process of risk control ensures that the board of directors and management have up-to-date insight into the risk situation of Magyar Posta Insurers, thus enabling them to manage risks early. The Risk Management Committee of Magyar Posta Insurers is the operational governing body of risk management. The Risk Management Committee prepares recommendations and serves an advisory function. The committee meets quarterly but may hold ad-hoc meetings as necessary. The Chief Risk Officer is responsible for operating the risk management system of Magyar Posta Insurers in accordance with the provisions of the Insurance Act. In addition to operating the risk management system, they report to the board of directors at least quarterly, thus making the risk management system part of the governance system.

Within the framework of individual risk assessment, Magyar Posta Insurers evaluate operational and strategic risks, and the method used to assess the given risk must be documented in the risk register. Risks related to the outsourcing of Magyar Posta Insurers are assessed.

Risks may differ at Magyar Posta Insurers for the non-life and life insurance segments, with the most significant examples presented above in this sub-chapter at the [IRO] section.

Identified risks are classified into low, medium or high-risk categories in terms of potential loss and likelihood of occurrence. In addition to assessing strategic and operational risks, Magyar Posta Insurers, in accordance with Recommendation No. 12/2023. (XI.27.) of the Magyar Nemzeti Bank, identifies and considers relevant short, medium and long-term risks arising from climate change and environmental degradation, and assesses their impact on the Insurer. The examination covers phys-

ical, transition, and liability risks. Risks are also represented using a risk heat map or impact-probability matrix.

In the case of Magyar Posta Insurers, there are no specifically allocated resources for risk-mitigation measures.

Solvency II requires insurers to ensure that their solvency capital exceeds the solvency capital requirement. Recommendation No. 6/2016. (VI.14.) of the Magyar Nemzeti Bank recommends that insurers maintain a volatility capital buffer to reduce the risks of continuous capital adequacy. The extent of the volatility capital buffer is detailed in the aforementioned Recommendation.

The following major risk management tasks arose at Magyar Posta Insurers during the 2024 business year:

- Completion of annual, quarterly calculations and data reports;
- Execution of quarterly risk assessment tasks and conducting the annual ORSA process;
- Implementation of risk management system developments;
- Conducting regular Risk Management Committee meetings,
- Collaboration with MABISZ working groups.

Gránit Biztosító's ESG strategy currently does not include measurable key performance indicators. In the Company's ESG strategy, which is currently being revised for the entire Group, specific measurable goals and target values will be defined for the future.

More information on the physical and transition risks of Magyar Posta Insurers is available in the chapter **[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model(s)**. Measurable performance indicators and targets have not yet been established for risks identified in the double materiality assessment.

During the 2024 business year, Magyar Posta Insurers also took sustainability risks into account in the identification and evaluation of risks, and in this context, sustainability limits were established for investments.

There are various methodologies applied at Magyar Posta Insurers to establish risk targets and outcomes, for example, for calculating the solvency capital requirement, Magyar Posta Insurers primarily use the Standard Formula calculation to quantify the risks covered by the model,

the determination of the risk budget is based on the ORSA process and policy requirements, the evaluation of investment-related risks is the responsibility of the Risk Management Committee, and for sustainability aspects, the methodology requirements recorded in policies are considered (“Environmental Performance Index”, “EU Sanctions Map”). However, there are risks for which expert estimation must be applied for quantification, and these methodologies must always be documented in writing. Calculations are typically conducted for quarterly and annual cycles, and Magyar Posta Insurers prepare their strategic and business plans for a five-year period.



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