

2024

CONSOLIDATED FINANCIAL STATEMENTS & BUSINESS REPORT



WABERER'S

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MESSAGE FROM THE CEO



"The 2024 business year was exciting in the life of Waberer's Group. While the economic environment – including industrial production and household consumption data, which primarily determine the demand for logistics services – showed signs of stagnation throughout the year

in Europe and Hungary alike, Waberer's Group, thanks to its growth strategy and appropriately diversified activities, was able to achieve further growth in terms of both revenue and profitability in this environment.

provide our employees with motivating tasks that will result in not only management, but also colleagues at all levels of the organisation finding their place in Waberer's Group."

While we were successful in managing the short-term goals, namely the results of the 2024 business year, during the year we made significant strides towards key strategic objectives such as the commencement of rail logistics activities, the expansion of the regional focus of contract logistics activities, the start of the establishment of a national warehouse logistics network, the significant expansion and diversification of our insurance segment activities, and – already in 2025, but before the publication of our Annual Report – entering the road passenger transport market.

These acquisitions and investments are value-creating steps that we hope will provide adequate returns for our investors and ensure a further significant growth trajectory for Waberer's Group. At the same time, they further diversify both our logistics and insurance activities, thereby improving the Group's future crisis resili-

ence and its ability to respond to market changes.

The expansion of the activities presented required and will continue to require significant adaptation and additional work from our staff. We see it as a priority to prepare our organisation for even greater and more complex tasks, and to

Zsolt Barna
Chief Executive Officer



CONSOLIDATED MANAGEMENT REPORT



WABERER'S

ABOUT WABERER'S GROUP

2 MAIN AREAS OF OPERATION:

LOGISTICS SEGMENT

Contract Logistics (RCL)

Market-leading Hungarian complex logistics service provider with an integrated service portfolio tailored to industry needs and customers (distribution, warehousing, home delivery, production support logistics, container transport, fresh goods logistics, etc.) and a continuously expanding regional focus.

International Transport and Freight Forwarding (ITS)

One of Europe's leading FTL (Full-Truck Load) transport service providers with own fleet and subcontractor operations, as well as rail and intermodal services (combination of rail and road transport) and air and sea supplementary logistics services, focusing on Europe's main industrial centres (UK, Germany, France, Italy, Spain, Poland, Hungary, Slovakia) and Central and Eastern Europe.

INSURANCE SEGMENT:

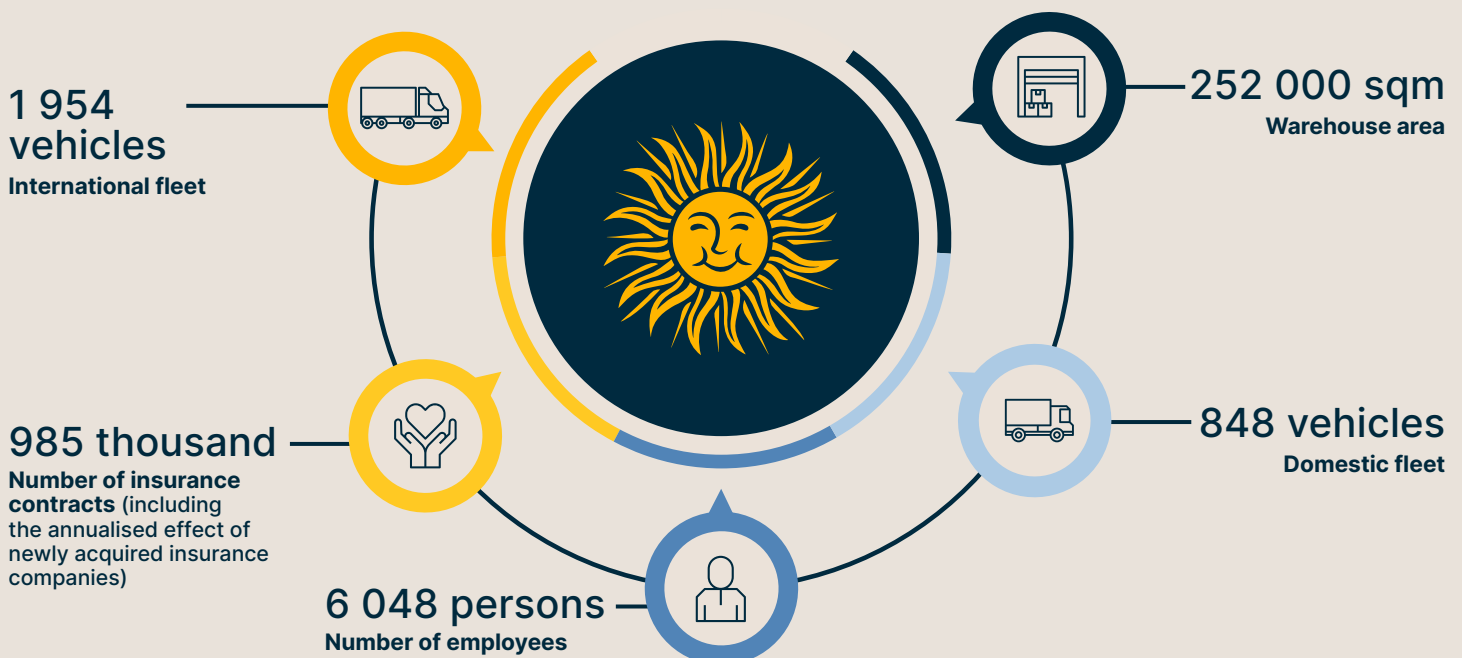
Non-life insurance

A wide portfolio of non-life insurance products (personal and commercial vehicle insurance, home insurance, travel and accident insurance, etc.), building on Gránit Biztosító's existing vehicle insurance focus and the diverse non-life insurance product range of Magyar Posta Biztosító acquired at the end of 2024.

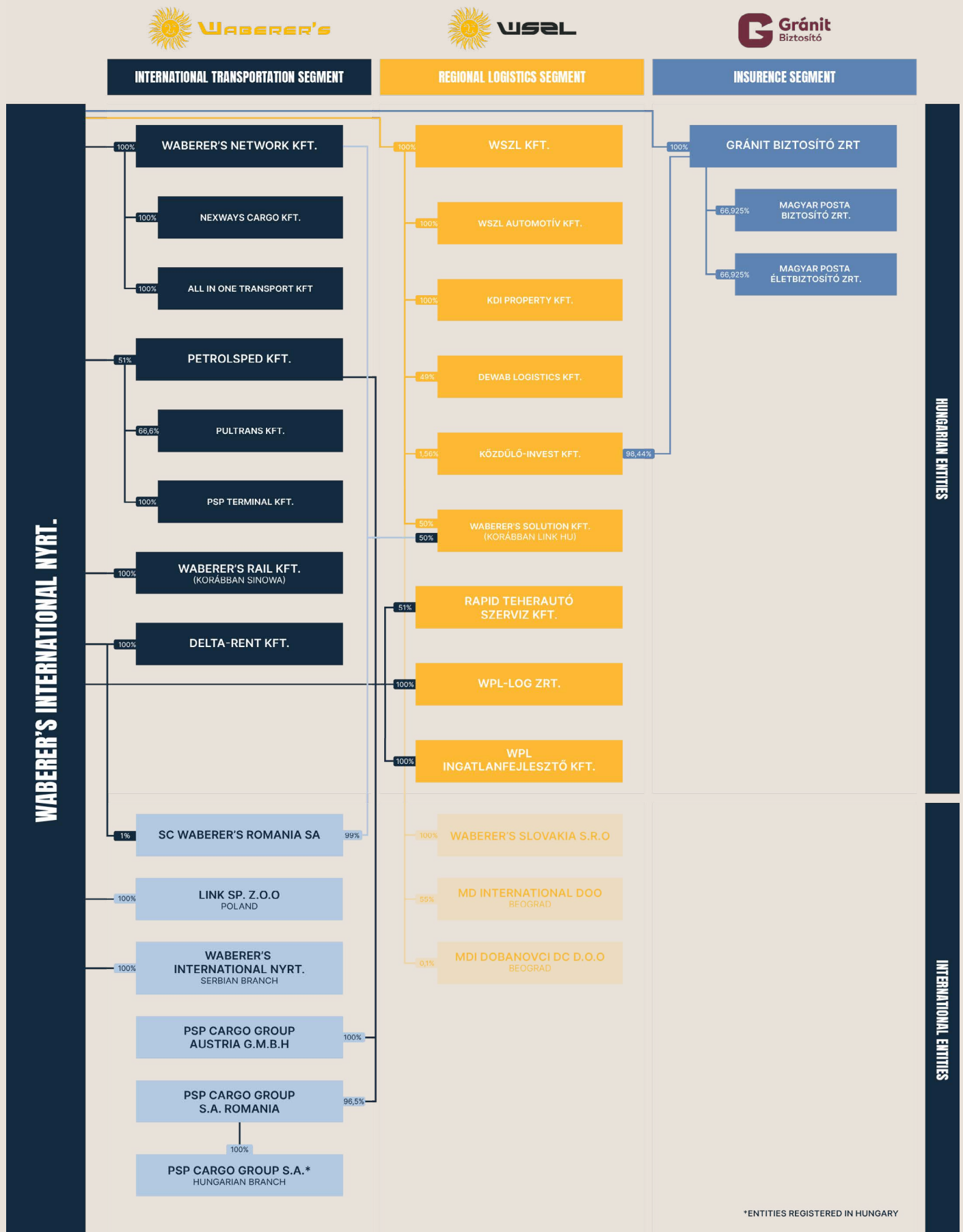
Life insurance

Significant market share in the Hungarian life insurance market following the acquisition of Magyar Posta Életbiztosító at the end of 2024.

KEY OPERATIONAL INDICATORS



PRESENTATION OF THE COMPANY STRUCTURE





STRATEGY

STRATEGY

At the end of 2023, Waberer's Group updated and published its Group strategy towards 2027. This current strategy builds on the development paths set in 2021 and focuses on further extending the achievements of the past 2 years.

Our vision is to grow Waberer's Group into the leading complex logistics service provider in the Central and Eastern European region.

The main pillars of the strategy to achieve this vision are:

- Infrastructure and technology development
- Increasing added-value
- Diversification
- Sustainability

The following development directions have been defined for the various business segments based on the above pillars:

IN IMPLEMENTING THE PILLARS OF OUR STRATEGY, WE PAY PARTICULAR ATTENTION TO SUSTAINABILITY ASPECTS			
	INFRASTRUCTURE AND TECHNOLOGY DEVELOPMENT	INCREASING ADDED-VALUE	DIVERSIFICATION
CONTRACT LOGISTICS	<ul style="list-style-type: none"> • Increasing warehouse capacity (national coverage) in an energy-efficient manner • Expanding the alternative powertrain fleet 	<ul style="list-style-type: none"> • In-house logistics growth • Establishing fulfilment logistics capability • Home delivery growth 	<ul style="list-style-type: none"> • Regional expansion (acquisition of MDI) • Entering new specialised logistics service segments
TRANSPORT & FREIGHT FORWARDING	<ul style="list-style-type: none"> • Fleet modernisation for more efficient operations 	<ul style="list-style-type: none"> • Increasing the share of revenue from specialised FTL services 	<ul style="list-style-type: none"> • Increasing the share of multimodal services (acquisition of Petrolsped)
INSURANCE	<ul style="list-style-type: none"> • Digitalisation of back-office activities for claims settlement and customer service • Expansion and digitalisation of sales channels 	<ul style="list-style-type: none"> • Delivering full digital customer experience 	<ul style="list-style-type: none"> • Expansion of the product portfolio • Examination of the possibility of regional market entry

CONTRACT LOGISTICS SEGMENT

Within the framework of the Group's Contract Logistics segment, which provides complex logistics services, we have started and wish to continue the following major developments in the coming years:

INFRASTRUCTURE AND TECHNOLOGY DEVELOPMENT

At the end of 2024, the segment provided warehousing and warehouse manipulation services on an area exceeding 250,000 m².

Current warehousing activity was previously mainly performed in leased warehouses and concentrated in the Budapest area. The current strategy assigns a key role to expanding Company-owned warehouse capacity, which, compared to leased warehouses, can be operated at significantly lower cost levels, is optimised for Waberer's operational model, and thus allows us to provide logistics services in newly-developed industrial centres where rentable warehouse capacity has not yet been established. About 2 years ago, we started the development of our first modern, Company-owned warehouse in Ecser, along the M0 ring road bypassing Budapest, directly adjacent to Ferihegy Airport. The nearly 47,000 sqm warehouse was completed in 2024 and is now operating at maximum capacity. In line with the industrialisation efforts in rural areas,

we plan to further **expand owned warehouse capacity** in major industrial centres in the near future. As a first step, in 2024 we started development on another warehouse logistics centre in Debrecen's newly developing industrial centre, which is expected to be completed in 2025, and in 2025 and subsequent years Waberer's is expected to appear with its own warehouse logistics capacity and services in other cities outside of Budapest, depending on the schedule of developing industrial production capacities and expanding logistics demand. The developing warehouse bases outside of Budapest, in addition to serving local industrial capacities, can also further improve the efficiency of national distribution capabilities.

In addition to developing warehouses for our own use, Waberer's – as a new business line – has also started develop-

ing warehouse logistics centres for external clients, where, after completion, it can provide long-term logistics services to the client as required.

The segment carries out its domestic distribution activity with nearly 800 vehicles. For 4 years in a row now, we have been providing our customers with a **distribution service with low environmental footprint using alternative powertrain vehicles**, mainly LNG and electric. Given the current technological limitations, the vehicles currently in our fleet (800-900 km range for LNG and 2-300 km range for electric vehicles) can be integrated into our domestic distribution activities with greater efficiency compared to long-distance international freight transport activities. Our customers' demand for these low environmental footprint distribution services is growing radically. In response, we have built up our capabilities to offer tailor-made solutions to meet these unique customer needs, giving us a signif-



icant competitive advantage. In line with our corporate and ESG strategy, we intend to further increase the share of alternative powertrain vehicles in our fleet and maintain Waberer's leading position in green logistics services. In addition to the tech-

nologies currently in use and being tested, we are paying particular attention to the emergence of hydrogen-powered vehicles, we expect this technology to play a significant role in the long-distance freight transport industry in the long term, and

we intend to start testing this technology within the period covered by our strategy, for which we have entered into a strategic alliance with other potential users and green hydrogen production companies in Hungary.

INCREASING ADDED-VALUE

In the contract logistics segment, we aim to focus sales on activities that can provide the biggest added-value to customers, require the highest expertise and accuracy from the logistics provider, and can become an addition to the existing service portfolio to foster deeper customer relationships.

Accordingly, we would like to further expand our portfolio of customer-facing **in-house logistics** services, which support the customers' existing manufacturing processes in the automotive, oil and chemical industries, and which are to be carried out at the customers' site. We also want to increase **our fulfilment and home delivery capabilities** to support online trade.

DIVERSIFICATION

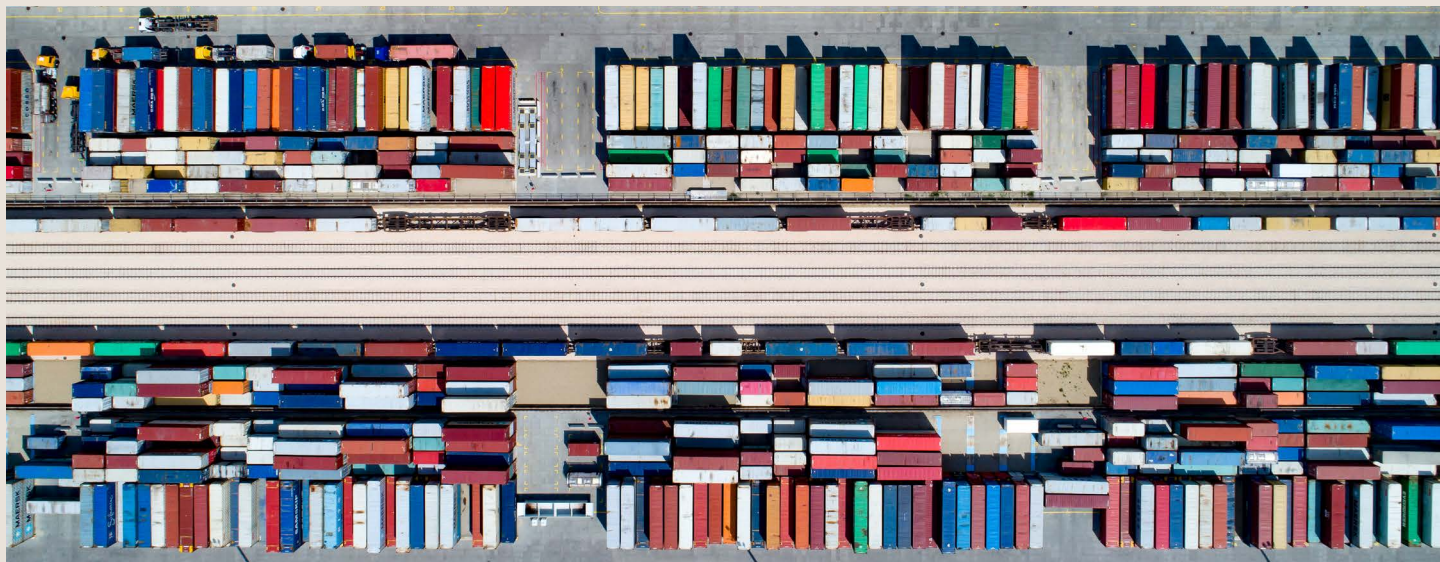
The focus of the contract logistics segment's activities was primarily Hungary in the previous period.

We aim to build a complex logistics service portfolio covering the entire region to exploit further growth opportunities and respond to the increasing demands of multinational clients. We intend to enter markets in neighbouring countries primarily through **acquisitions**. Given the fact that an efficient logistics operation can only be established with the right economies of scale, entering markets through

acquisitions can provide us with the infrastructure, workforce and existing customer portfolio to allow us to serve customers at the regional level. As a first step in this strategy, at the beginning of 2024, we completed our first regional acquisition project in Serbia, where Waberer's acquired a majority stake in MD International d.o.o., one of the country's leading distribution companies. For the coming

years, the acquisition focus is currently on Poland, the Czech Republic, Slovakia, and the Western Balkans.

Further diversification of the segment focuses on services and special sub-segments where we currently have a low market share. Potential segments include serving pharmaceutical customers, and logistics services related to waste recycling, etc.



TRANSPORT AND FREIGHT FORWARDING

INFRASTRUCTURE AND TECHNOLOGY DEVELOPMENT

The basis of own-fleet international transport is the existence of a fleet that can be operated efficiently and ensures reliable availability.

As a result of **replacing the elements of our fleet** over the past 2 years, the Group has reached its strategic target of having an **average fleet age of 2.5 years**. In the coming years, we intend to maintain this average age and continue the process of

ongoing fleet renewal, while we do not plan to make any significant changes to the size of the fleet, fine-tuning it in line with the results of current tenders.

In the spirit of diversification, Waberer's places significant emphasis on expanding

its rail logistics capabilities. Within this service branch, we intend to establish and develop rail terminal capacity in the main Hungarian industrial hubs. As a result of the acquisitions closed and signed in the recent period, Waberer's has acquired and intends to further develop rail terminal operation capacity and capabilities in Debrecen, Szeged, and Sopron to serve the new industrial capacities being established in these regions.

INCREASING ADDED-VALUE

In the international transport segment, a turning point is brought about by the shift to **key account focused operations**.

The transport service offered by Waberer's can provide a competitive service to customers who expect **outstanding service quality, availability of additional ser-**

vices (e.g. tracking, special cargo, flexible capacity allocation, alternative fuels, etc.) and customer-oriented operation. Accordingly, we intend to further increase

the weight of key account customers and the ratio of freights requiring additional services within the operation, which we aim to increase to 60% by 2027 through the active management of the customer portfolio and sales focus.

DIVERSIFICATION

In international freight forwarding, Waberer's 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. This objective can be supported by carrying out these transport tasks **by rail**. Recognising this, at the start of 2024, Waberer's Group acquired a majority stake in PSP (Petrolsped) Group, a company with significant infrastructure and experience in rail logistics, and at the end of 2024 signed a sale and purchase contract to acquire a majority stake in GYSEV-CARGO. As a result of these acquisitions, Waberer's becomes the second largest player in the Hungar-

ian rail logistics market and, through the foreign subsidiaries of these companies, acquires rail company capacities in the Romanian and Austrian rail logistics markets, and gains the ability and references to perform rail logistics tasks in nearly 20 countries across Europe with its own fleet and by involving subcontractors. Through these acquisitions, Waberer's has entered the market for the transport of bulk goods that are already predominantly transported by rail (construction materials, grain, oil products, etc.), and the synergy between these two companies, as well as the significant growth potential provided by the

rail transport options to be offered to Waberer's extensive European and Hungarian customer base, ensures significant growth potential for the Group.

INSURANCE

When the insurance segment of Waberer's Group was established, the primary objective of the activity was to efficiently manage the insurance of the Company's own road fleet. Over the past more than 10 years, the insurance company has successfully expanded first in the commercial vehicle market and then in the passenger car insurance market among market clients, growing to become one of the top five insurers in this segment and becoming one of the most efficient insurance companies alongside its focused activities.

The announced strategy of the segment was the diversification of focused insurance activities related to vehicles and logistics services, and we made a significant step in implementing this strategy by acquiring a majority stake in Magyar Posta Biztosító and Magyar Posta Életbiztosító at the end of 2024. The newly acquired insurance companies have not

only significantly expanded the Group's insurance product portfolio with life and further non-life insurance (home, travel, accident insurance, etc.) services, and increased the Group's market share in the insurance market, but also gained access to an insurance operation that operates with a significantly different customer profile and sales channel focus compared

to Gránit Biztosító. These complementary features offer significant synergy and diversification opportunities, thus opening up further growth opportunities for the Group's insurance segment and a lower operational risk level resulting from more diversified operations.

Accordingly, the main focus of the insurance segment's strategy over the next 2 years will be to map out the best operational practices of the two insurance companies, extend these practices across Group level, exploit the synergies between complementary sales channels and customer bases, and establish the optimal level of integration.



BUSINESS ENVIRONMENT AND RESULTS



WABERER'S

BUSINESS ENVIRONMENT AND RESULTS

PROFIT AND LOSS STATEMENT (EUR MILLION)¹

	2,024	2,023	INCREMENT (DECREASE)
Revenue	757.5	710.9	6.6%
Gross margin	94.9	89.7	5.8%
of which: excluding depreciation & amortisation	149.7	142.5	5.1%
Operating income	41.9	42.8	(2.1%)
Financial result	(17.0)	(4.0)	(321.7%)
of which: non-realised FX effect	(3.7)	6.5	(156.7%)
Share of income of associates and jointly controlled entities	2.4	(0.0)	
Profit before tax	27.3	38.8	(29.5%)
Taxes	(5.6)	(9.1)	38.1%
Net income	21.7	29.7	(26.9%)
Net income excluding non-realised FX effect	25.4	23.1	9.8%
EBITDA	102.0	95.6	6.7%
EBIT	45.0	42.8	5.2%
Earnings per share (EPS – in EUR)	1.25	1.69	(26.9%)
Gross margin rate (without depreciation)	19.8%	20.0%	(0.3 pp)
EBITDA margin	13.5%	13.4%	0.0 pp
EBIT margin	5.9%	6.0%	(0.1 pp)
Net income margin	2.9%	4.2%	(1.3 pp)
Average number of trucks	2,847	2,891	(1.5%)
Average number of employees	6,048	6,044	0.1%
Warehouse capacity (thousand square metres)	244.3	229.1	6.6%

¹ The data have been recategorized for comparability, with the impact of insurance provisions – by default recognised under indirect costs – reclassified as a direct cost. This does not affect EBITDA. Percentage changes are presented on the basis of the actual values (and not the rounded values shown in the table).

ECONOMIC ENVIRONMENT

Given its operating model and geographic focus, demand for Waberer's Group's services is driven primarily by changes in industrial production and household consumption trends in the main industrial production hubs of Western Europe (UK, Germany, France, Italy, Spain, Benelux), as well as Hungary and Poland.

In 2024, industrial production volumes in the Western European countries relevant for Waberer's declined by an average of 2.3% year-on-year, while the relevant Eastern European countries experienced a smaller decline of 0.3% on average. Retail sales of non-food products in the relevant European countries slightly increased, averaging 1.6%, which was below the average European inflation, however, retail sales did not decline in any of the relevant countries.

As far as main direct costs are concerned, the fuel price level in 2024 decreased by 4% compared to the average of the previous year, however, volatility through the quarters was significant. Given that in 2022, the clauses in the transport contracts that deal with the impact of fuel price fluctuations have been amended to ensure that our service prices now track the impact of fuel price changes on a monthly basis, the impact of fuel price fluctuations on profits is marginal.

In some of the main countries contributing to Waberer's turnover (primarily Hungary and Germany), the specific road tolls nearly doubled, which Waberer's is able to incorporate into its service pricing. In Hungary, the road toll increase varied depending on the environmental classification of the vehicles, thus Waberer's relative competitive position improved compared to the market average, as the fleet consists 100% of EURO6 rated or alternatively powered, environmentally-friendly vehicles.

For the stability of operations, it is vital for Waberer's Group to have the appropriate workforce, with over 4,000 drivers and warehouse blue-collar workers supporting our logistic processes at Group level in 2024. In order to ensure sufficient staffing levels, we started recruiting – mainly drivers – from the labour markets of the neighbouring countries several years ago, and for the past 3 years we have been adding Asian staff members to our team.

Regardless of the current labour market situation, we believe it is of paramount importance that we have built the channels that allow us to ensure that securing the right workforce does not pose a significant business risk in the long term.

REVENUE

Waberer's Group's revenue in 2024 reached EUR 757.5 million, which is 6.6% higher than the consolidated revenue in 2023.

In 2024, the Contract Logistics segment (RCL) achieved a turnover of EUR 251.8 million, resulting from a 20.0% annual growth (EUR +42 million). The driver of the growth of the segment, which is the focus of the Group's strategy, was for the most part the ramp-up of transport tasks related to waste recycling in 2024, however, the segment's other main areas (distribution, warehousing, manufacturing support logistics) also managed to increase their turnover partly due to expanding volumes and the incorporation of rising costs into service prices.

The Transportation and Forwarding

segment's revenue reached EUR 442 million throughout the business year, which corresponds to a 1.2% expansion. The segment's own fleet road transport activity turnover decreased by 9%, mostly due to the decrease of our own fleet size. The fleet size reduction is mainly related to the transformation of the segment's business model in Poland and the increased emphasis on subcontractor activities. The decrease in turnover from own fleet transport activities was compensated in 2024 by a 21.8% revenue increase in freight forwarding services – carried out by subcontractors – which represent a lower fi-

nancial risk.

The Insurance segment's annual revenue in 2024 decreased by 2.8% in EUR and reached EUR 80.2 million. With the introduction of IFRS 17 as of 2024, the insurance tax is accounted as a revenue-reducing item, resulting in a decrease in annual turnover compared to 2023. The annual turnover calculated in HUF – which is the primary currency for settlements with clients – and excluding the accounting change of insurance tax, the segment's revenue increased by 15%. The acquisition of Posta Insurers in 2024 Q4 did not affect the segment's revenue or the comprehensive profit/loss statement.

GROSS MARGIN, EBITDA AND EBIT

In 2024, the Group's consolidated gross margin – calculated without depreciation – was EUR 149.7 million, which corresponds to a 5.1% increase. The annual gross margin rate was 19.8%.

For the first time in Waberer's history, the Group's annual EBITDA exceeded the EUR 100 million mark, reaching EUR 102 million, which represents a 6.7% improvement compared to 2023. The annual EBITDA margin was 13.5%. The RCL segment's EBITDA in 2024 was EUR 37.4 million, resulting from a 21% expansion, while the ITS segment achieved an EBITDA of

EUR 40 million in 2024. The Insurance segment's annual EBITDA was EUR 24.6 million (+30%) with an EBITDA margin of 30.7%.

The Group's EBIT reached a record EUR 45 million on an annual basis, which represents a 5.2% increase compared to 2023. The consolidated EBIT margin was 5.9%. The EUR 3.9 million increase in the

RCL segment and the EUR 5.6 million increase in the Insurance segment offset the decrease in EBIT of the ITS segment (EUR – 7.3 million) in 2024.

Direct costs amounted to EUR 608 million in 2024, representing a 7% increase on an annual basis. Consolidated indirect costs grew by 13% in 2024. The depreciation cost, which can be considered as the cost of the basic logistics infrastructure (fleet & warehouses), was EUR 54.8 million during the business year, representing a 4% increase.

NET INCOME

The financial result showed a loss of EUR 17 million in 2024, which is EUR 13 million more than the loss in the previous year.

The financial result mainly includes interest expenses related to fleet leasing and the bond issued in April 2022, interest income from financial investments not related to insurance activities, and other financial effects – mainly unrealised, non-cash effects resulting from exchange rate changes. 80% of the deterioration in the financial result is due to the unreal-

ised, non-cash flow effect resulting from the change in rate of the HUF against the EUR. This effect was EUR -3.7 million in 2024, while in 2023 the HUF strengthened against the EUR, resulting in a EUR +6.5 million effect in the base year.

The net income at Group level was EUR 21.7 million in 2024, while the net profit calculated without the unrealised,

non-cash – i.e., from the revaluation of liabilities – foreign exchange effect reached EUR 25.4 million. The latter value represents a 9.8% increase compared to 2023.

DEBT

DEBT DATA (IN MILLION EUR)		
	31 DECEMBER 2024	31 DECEMBER 2023
Net financial indebtedness	236.7	214.2
Net leverage	2.3	2.2

The Company's net financial indebtedness position as at 31/12/2024 amounted to EUR 236.7 million, an increase of EUR 22.5 million compared to the end of 2023. The increase in the level of indebtedness was due to the decrease in the Group's cash balance.

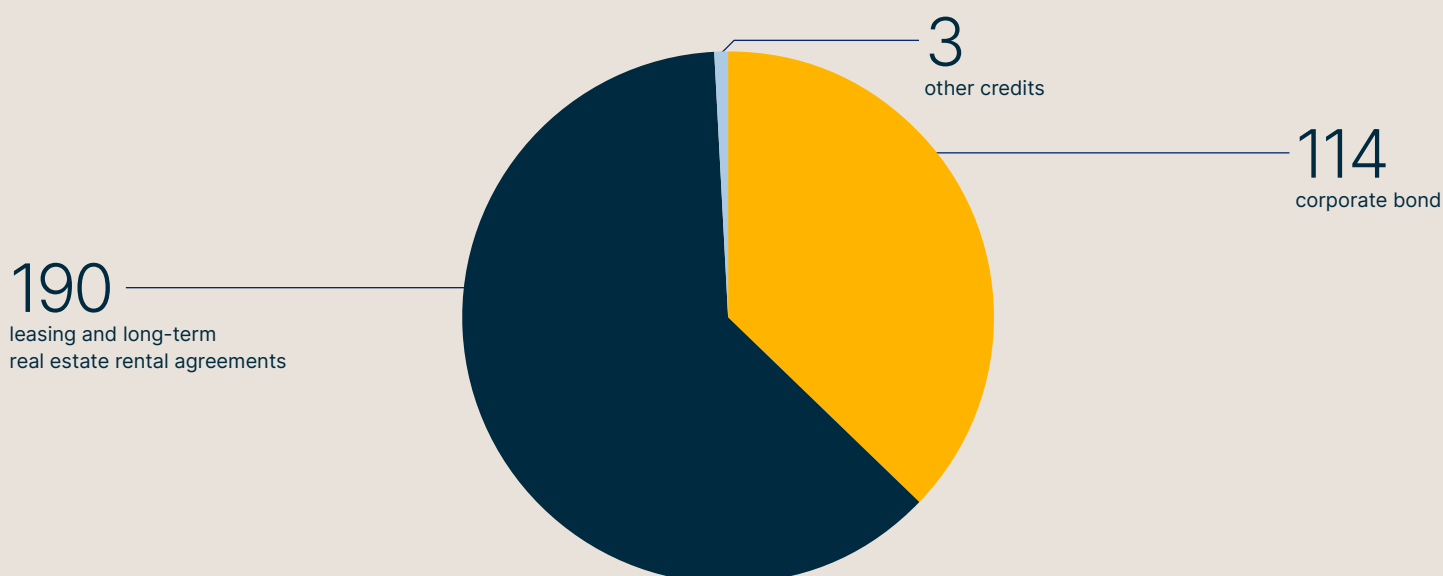
The decrease in cash balance was mainly a consequence of cash outflows due to the two acquisitions completed in 2024 (MDI, PSP Group) and warehouse investments (Ecser and Debrecen), which were

partly offset by the Company's cash-generating capacity from operations.

The Company's net leverage, expressed as a multiple of the previous 12 months' recurring EBITDA, increased from

2.2x at the end of 2023 to 2.3x.

At the end of 2024, Waberer's Group had access to the following main sources of external financing (in million EUR):

**CORPORATE BOND:**

fixed-rate bond issued in 2022, maturing in 2032, with repayments starting in 2027 in 10% annual instalments. The purpose of the bond is to refinance loans, finance the construction of logistics warehouses, finance regional acquisitions and finance fleet replacement.

LEASING AND LONG-TERM REAL ESTATE RENTAL AGREEMENTS:

- Waberer's Group finances the vehicles in its fleet mainly through leasing.
- Waberer's Group typically enters into long-term leases for the use of real estate rented for its operations (mainly warehouses and partly office buildings). The value of rents under these agreements is capitalised under current IFRS16 rules, and included in the Group's debt portfolio.

OTHER CREDITS:

Working capital financing

MAIN EVENTS IN 2024

In 2024, the following major events took place at Waberer's Group:



JANUARY 2024:

- Waberer's purchases land in Debrecen, thus commencing the development of warehouse logistics centres in major non-Budapest industrial hubs

FEBRUARY 2024:

- Waberer's acquires a 51% stake in the PSP Group, thereby entering the rail logistics segment as well

MARCH 2024:

- Waberer's acquires a 55% stake in MDI in Serbia as the first step in building regional contract logistics capability

APRIL 2024:

- Waberer's holds its Annual General Meeting, where a dividend payment of HUF 120 per share is approved
- MOL Group acquires a 15% stake in Waberer's

JUNE 2024:

- The Waberer's Board of Directors adopts the Company's updated dividend policy

AUGUST 2024:

- Waberer's announces the launch of its logistics real estate development business line as a new business segment, which will also carry out warehouse logistics developments for third-party clients

NOVEMBER 2024:

- Waberer's acquires a 66.925% stake in Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt., thus implementing the Group's planned diversification of its insurance segment

DECEMBER 2024:

- Two additional out-of-court settlements are reached with truck manufacturers in the competition law infringement case opened in 2017
- Waberer's signs a sale and purchase contract to acquire a 70% stake in GYSEV-CARGO, further strengthening the Group's rail logistics capabilities in Hungary and the region



**OWNERSHIP
STRUCTURE**

**CAPITAL MARKET
PERFORMANCE**

**INVESTOR
RELATIONS**



WABERER'S

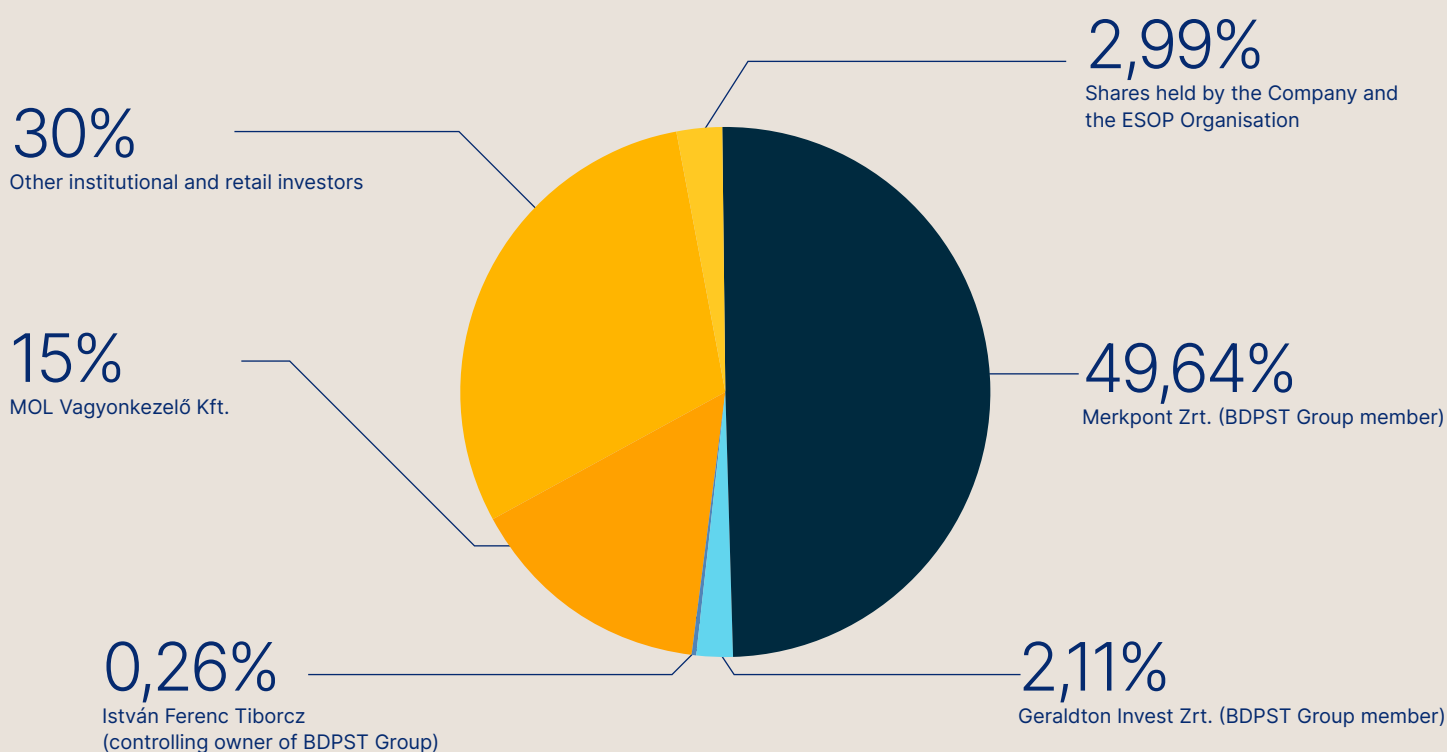
OWNERSHIP STRUCTURE / CAPITAL MARKET PERFORMANCE / INVESTOR RELATIONS

SHAREHOLDER STRUCTURE

The main changes to the ownership structure of Waberer's in 2024 are as follows:

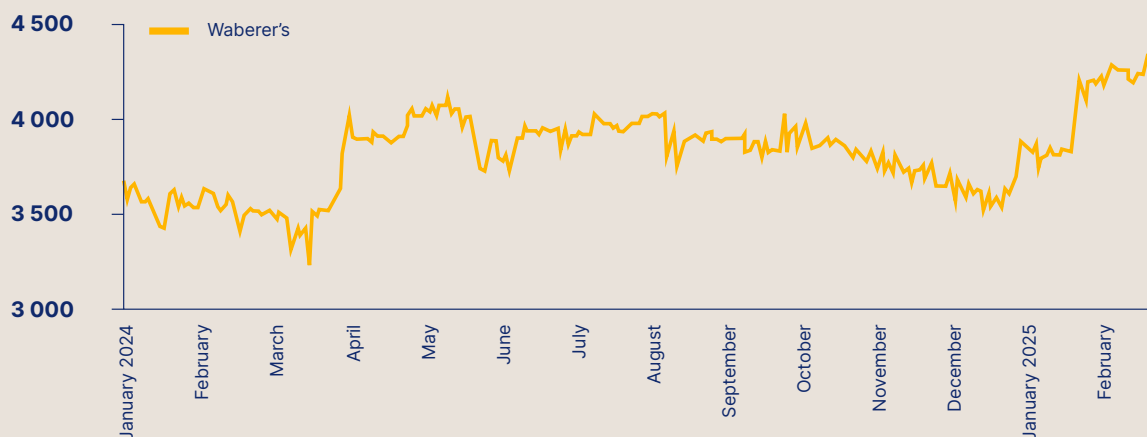
- The ownership stake of Trevelin Holding Zrt. – which stood at 23.96% at the end of 2023 – fell below 5% in 2024.
- MOL Nyrt. acquired a 15% stake on 25/04/2024.
- In line with the announced ESOP programme, the ESOP Organisation of Waberer's purchased a 1.78% share package.
- The free float – excluding treasury shares and shares held by Waberer's ESOP Organisation – increased to 30% in 2024.

As a result of the above, the ownership structure of Waberer's International Nyrt. as at 31/12/2024 was as follows:



CAPITAL MARKET PERFORMANCE

The share price of Waberer's during 2024 and the first quarter of 2025 – prior to the closing of this Annual Report – was as follows:



ANALYSTS

The Company's performance in 2024 was regularly monitored by the following 3 analyst firms, and their published target prices and Recommendations as at the end of 2024 were as follows:

ANALYSTS		CURRENT TARGET PRICES	
Name of analyst firm:	Concorde Értékpapír Zrt.	Name of analyst firm:	Concorde Értékpapír Zrt.
Name of analyst:	Gábor Bukta	Current target price:	HUF 4,800 (Recommendation: Buy)
Contact details:	g.bukta@con.hu	Updated on:	4 October 2023
Name of analyst firm:	Equilor Befektetési Zrt.	Name of analyst firm:	Equilor Befektetési Zrt.
Name of analyst:	Péter Szemán	Current target price:	HUF 5,022 (Recommendation: Buy)
Contact details:	peter.szeman@equilor.hu	Updated on:	12 April 2024
Name of analyst firm:	MBH Befektetési Bank Zrt.	Name of analyst firm:	MBH Befektetési Bank Zrt.
Name of analyst:	Csaba Debreczeni	Current target price:	HUF 5,476 (Recommendation: Buy)
Contact details:	debreczeni.csaba@mbhbank.hu	Updated on:	18 November 2024

The regular analyses prepared by the analysts are available on the Company's website at <https://www.waberers.com/hu/befektetoknek/elemzesek>

INVESTOR RELATIONS

CONTACT THE INVESTOR RELATIONS DEPARTMENT:

Viktor Majzik

Capital Markets Director responsible for Investor Relations

Telephone:
+36 1 421 6300

Mobile:
+36 70 488 8069

E-mail:
investor.relations@waberers.com



COMPLIANCE

COMPLIANCE

The main task of our quality management is to track and meet market expectations, while keeping the company's processes systematic, traceable and transparent.

The management of Waberer's Group has decided to implement the ISO 9001 quality management standard and, integrated with this, the ISO 14001 environmental management, ISO 28000 security management, ISO 50001 energy management, VDA 6.2 automotive supplier standard, HACCP and IFS Logistics food safety and ISO 45001 occupational health and safety systems for its subsidiaries involved given in their activities, in order to satisfy customer and statutory requirements at a high level. We consider the continuous and flexible development of our integrated management system and the achievement of our objectives to be a priority, in order to secure a long-term future and contribute to the success of our customers, our employees and society. The Group's employees embrace the requirements of the

integrated management system, and their work is characterised by a focus on precision, quality, the environment and energy. All this is supported by an effective training and information system, making a conscious contribution to the implementation of a complete, integrated management. The Group is committed to safe and healthy work. All our employees have a duty to work in a safe and careful manner in their work area, and are provided with the necessary protective equipment and knowledge, and undergo mandatory annual refresher training. Our activities are carried out under appropriate hygiene conditions, with particular attention to personal and warehouse hygiene. We take utmost consideration of and comply with legislation to protect the quality of human life and the natural environment,

and other requirements imposed by our customers, as well as with applicable legal and other obligations related to energy efficiency. We support the procurement of energy efficient products and services to achieve better energy efficiency. In order to prevent environmental damage, we have assessed and continuously reduce the environmental impacts and risks of our activities, and we also strive to protect customer property and products.





CORPORATE GOVERNANCE AND CORPORATE BODIES



WABERER'S

CORPORATE GOVERNANCE AND CORPORATE BODIES

BOARD OF DIRECTORS

The Company's executive body is the Board of Directors, which manages the affairs of the Company and the Group, represents the Company towards third parties, courts or other authorities. Acting for and on behalf of the Company, the Board of Directors may acquire rights, assume liabilities, and determine the Company'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.

The Board of Directors is made up of at least 3 (three) and not more than 7 (seven) members. The members of the Board

of Directors are elected by the General Meeting for a term of three years. Unless the General Meeting makes no other provision, the mandate of the members lasts until 31 May of the third year following their election, with the proviso that if in the year of the expiration of their mandate the annual general meeting is held prior to 31 May, their mandate expires on and by the day of the general meeting. The Board of Directors elects a chairperson from among their members. The division of tasks and competences among the members of the Board of Directors is defined in detail in the rules of procedure of the Board of Directors (<https://www.waberers.com/befektetoknek/tarsasagiranyitasi-adatok/tarsasagiranyitasi-alapdokumentumok>).

The Board of Directors determines its rules of procedure at its own discretion.

The Board of Directors may make a decision regarding all matters and cases affecting the Company, unless they fall within the exclusive competence of the General Meeting. In all matters where decision-making falls within the exclusive competence of the General Meeting by law, the Board of Directors must submit a proposal regarding the decision to be made by the General Meeting.

The Board of Directors may make a decision regarding all matters and cases affecting the Company, unless they fall within the exclusive competence of the General Meeting. In all matters where decision-making falls within the exclusive competence of the General Meeting by law, the Board of Directors must submit a proposal regarding the decision to be made by the General Meeting.

The duties of the Board of Directors include in particular but are not limited to the following matters:

- the verification of the individual and consolidated business and financial plans of the Company and Group members, including their major capital investments, acquisitions and divestitures;
- the submission of the annual report as per EU IFRS and the Accounting Act (including a proposal for the utilisation of net earnings/profit after tax) to the General Meeting;
- the submission of the report outlining the corporate governance practice of the Company to the annual ordinary General Meeting, including the ongoing supervision of the efficiency and effectiveness of the corporate governance practice;
- the preparation of a report on the management and on the Company's financial position and business policy at least once a year for the General Meeting and on a quarterly basis for the Supervisory Board;
- ensuring the proper and compliant keeping of the Company's business books;
- participation in laying down the strategic guidelines and in developing a corresponding strategy; participation in any strategic cooperation agreement, partnership and/or joint venture by, for and on behalf of the Company or any Group member;
- exercising the shareholder's rights with respect to Major Subsidiaries;
- setting the corporate objectives in agreement with the Supervisory Board, including the ongoing supervision of their accomplishment, and the provision of information about implementation to the Supervisory Board;
- ensuring the compliance of financial and accounting reports;
- exercising the employer's rights towards employees in key positions, determining the remuneration principles of management, supervising their activities and, if necessary, taking the appropriate measures to enforce that the Remuneration Policy approved by the General Meeting is observed;
- managing the cases of conflicts of interest, approving associated transactions, approving guidelines that are designed to strengthen the application of the arm's length principle, i.e. the usual terms and conditions to be applied between and among independent parties, tracking the related practice adopted by the Company, approving the Code of Conduct of the Company;
- determining the risk management guidelines and policies that are designed to ensure the mapping and assessing of risk factors, the appropriateness of internal control mechanisms, including their legal compliance;
- specifying the mechanism of how to appoint the members of the Board of Directors;
- determining the principals and fundamental rules of management succession;
- laying down the principles concerning the transparency of corporate operation and the disclosure of important corporate information, including the supervision of adherence thereto;
- ensuring that appropriate contacts (with appropriate frequency) are maintained with shareholders, approving the policy governing insider dealing, including the discharging of tasks as per the powers set out in the policy;
- deciding on the appointment of external advisers to assist the work of the Board of Directors.

The meeting of the Board of Directors has quorum if at least half of its members are present. The Board of Directors passes its resolution by open voting with the simple majority of the members present, unless the rules of procedure provide otherwise. Additional rules regarding the holding, the powers of and decision-making by the meetings of the Board of Directors are set forth in the rules of procedure of the Board of Directors.

The members of the Board of Directors may hold senior management / executive positions in another economic operator engaging in core activities that are identical with those of the Company (international and domestic road haulage) only if such positions were approved / authorised by the general meeting of the Company, or (in the case of another business engaging in an activity that is identical with that

tional and domestic road haulage) only if such positions were approved / authorised by the general meeting of the Company, or (in the case of another business engaging in an activity that is identical with that

of the Company) by the Board of Directors of the Company.

With a view to the fact that the Company operates a two-tiered governance model, the independence of the members of the Board of Directors does not need to be assessed and is therefore waived.

The members of the Board of Directors, their status and the date of their appointment in 2024 (the professional curriculum vitae of current members is available on the website of the Company, their name in the table below is shown in bold):

NAME	POSITION	DATE AND TERM OF ELECTION
Zsolt Barna	executive member / chair	19/04/2023 – 31/05/2026
Róbert Barlai	non-executive (external) member	19/04/2023 – 31/05/2026
Barna Erdélyi	executive member	01/09/2021 – 31/05/2027
Szabolcs Gábor Tóth	executive member	12/04/2024 – 31/05/2027
Dr. György Bacsa	non-executive (external) member	12/04/2024 – 31/05/2027

The members of the Board of Directors did not hold any Waberer's shares as at 31 December 2024.

CHIEF EXECUTIVE OFFICER

The Company's work is organised, directed, managed and controlled by the Chief Executive Officer (CEO), in accordance with the law and the Articles of Association, pursuant to decisions made by the General Meeting and the Board of Directors. Decisions on matters concerning which the General Meeting, the Board of Directors or the Supervisory Board do not have exclusive powers, fall within the scope of authority of the CEO. The CEO develops the Company's work organisation, and exercises employer's rights towards and over the Company's employees (excluding senior officers in key positions), which powers may be delegated to the employees of the Company.

The establishment, modification, and termination of the employment relationship with the Chief Executive Officer of the Company fall within the competence of the Board of Directors. The CEO of the Company is Zsolt Barna who has served in the position of Chief Executive Officer since 1 September 2021.

THE PRESENTATION OF THE MANAGEMENT

In 2024, the following persons belonged to the key management positions of the Company and the Group:



ZSOLT BARNA

serves as the CEO of the Company from 1 September 2021 and as Chairman of the Company's Board of Directors from 19 April 2023, and served as Managing Director of the regional contracted logistics business from 2008 until 1 October 2023;



BARNA ERDÉLYI

is an executive member of the Board of Directors, and has served as the Director for Corporate Affairs from 1 September 2021. He is chairman of the Boards of Directors of Gránit Biztosító Zrt. (prior to 15/02/2024: Wáberer Hungária Zrt.) and – following the completion of the acquisition – of Magyar Posta Életbiztosító Zrt., Magyar Posta Biztosító Zrt. and LINK Sp. z o.o, while also serving as Chairman of the Supervisory Board of MD International SA in Serbia;



SZABOLCS GÁBOR TÓTH

as served as Chief Financial and Strategic Officer since 23 June 2020, and as an executive member of the Board of Directors since 12 April 2024. Until 1 October 2023, he served as co-Managing Director of WSZL Kft., and is currently a member of the Boards of Directors of subsidiaries Gránit Biztosító Zrt. (prior to 15/02/2024: Wáberer Hungária Zrt.) and LINK Sp. z o.o, as well as holding other executive positions within the Group.

The relationship between the Board of Directors and management:

The executive members of the Board (Zsolt Barna, Barna Erdélyi and Szabolcs Tóth) of the Company participate in the decision-making of the Board of Directors, whilst the Chief Legal Counsel, along with the heads of the business lines, are permanent guests invited to the meetings of the Board of Directors. The Board of Directors may invite additional directors of various professional areas in an ad hoc manner to discuss certain subjects.

Regarding the profitability of the Company's and the Group's activities, the management delivers monthly reports to the members of the Board of Directors during the ordinary meetings of the Board of Directors, apart from which flash financial reports are also sent to Board members on a weekly basis. The monthly management report features a uniform, standard structure providing information about the monthly and year-to-date (cumulative) figures of the Company's and the Group's operations, highlighting the deviation of

profitability and key performance indicators from values in the base period and the business plan. Key economic and other operational data presented in the monthly management report include:

- changes in the consolidated profit of the Group;
- changes in the revenue, EBITDA, EBIT, and after-tax profit/loss values of the Company and the Group by key areas, including a detailed variance analysis of deviations from the plan and the base period;
- changes in the consolidated turnover of the Company and the Group;
- changes in the profit, key performance indicators and quality ratios of the various business areas (including in particular the international transport and regional contracted logistics segment and insurance activities);
- changes in the assets, financial position and indebtedness of the Group;
- the results of vehicle procurement

and sales activities, and the factors influencing deviations

- changes in the current employee headcount of the Group by professional areas; with a focus on professions with talent shortage;
- the status of business relations with major customers and suppliers;
- working capital management;
- the current status of key corporate projects;
- the status of property development plans and investments;
- description of the various steps taken towards acquisition targets;
- other strategic decisions, action plans.

Regarding major changes to and in projects that either affect the operations of the Company and Group or that are deviating from the business plan, management carries out ad hoc analyses for the Board of Directors.

SUPERVISORY BOARD

The Supervisory Board is a body consisting of at least 5 (five) members, which functioned with 6 (six) members in 2024. Members of the Supervisory Board are elected by the General Meeting for a term of 3 (three) years.

Unless the General Meeting provides otherwise, the mandate of the members lasts until 31 May of the third year following their election, with the proviso that if in the year of the expiration of their mandate the annual general meeting is held prior to 31 May, their mandate expires on and by the day of the General Meeting. One third of the Supervisory Board consists of employees' delegates. The employees' delegates are appointed by the Works Council from among the employees, taking into account the opinion of the trade unions operating at the Company. Apart from membership based on employee participation rules, no employee of the Company may be a member of the Supervisory Board. Following the election of its members, the Supervisory Board elects a chairman from among its members for the duration of the chairman's term of membership.

The majority of the members of the Supervisory Board must be independent persons. A member of the Supervisory Board is considered independent if they have no legal relationship with the Company other than their membership of the Supervisory Board and a transaction which is part of the normal activities of the Company and which meets the needs of the member of the Supervisory Board. The majority of the members of the Supervisory Board has no relationship of any kind with the Company, its management and its controlling shareholders. The Supervisory Board requests the members to

confirm their independence annually, prior to the preparation of the Corporate Governance Report.

The members of the Supervisory Board must participate in person in the Supervisory Board's operation. The members of the Supervisory Board are independent from the management of the Company and may not be instructed in their activities. The Supervisory Board establishes its own rules of procedure that is approved by the General Meeting.

A member of the Supervisory Board may not be a senior officer or, except for the acquisition of shares in a public limited company, acquire shareholding in companies which are engaged in an economic activity as core activity identical to that of the Company, unless the General Meeting of the Company has given its consent. A member of the Supervisory Board or their relative – with the exception of usual everyday transactions – may not conclude contracts in the scope of the core activity of the Company in their own name or for their own benefit. A member of the Board of Directors of the Company or their relative may not be elected as a member of the Supervisory Board. If a member of the Supervisory Board takes a new mandate for another executive office, they shall notify the Company within 15 (fifteen) days of accepting such mandate.

The Supervisory Board supervises the management of the Company in order to safeguard the interests of the Company.

In order to carry out this activity, it may inspect the Company's documents, accounting records and books, request information from the Board of Directors and the Company's employees, examine the Company's payroll, cash, securities and goods and contracts and have them examined by an expert. The Supervisory Board is obliged to examine the proposals submitted to the General Meeting, and to present its position on them to the General Meeting. The General Meeting's proposal on the Remuneration Policy must also be assessed in advance by the Supervisory Board. The General Meeting may render decision on the annual accounts in accordance with the Accounting Act and the use of profit after tax only after receiving a written report from the Supervisory Board.

If, in the opinion of the Supervisory Board, the activities of the management are in conflict with the law or the Articles of Association, contrary to the resolutions of the General Meeting or otherwise prejudicial to the interests of the Company, the Supervisory Board is entitled to convene a General Meeting to discuss the matter and take the necessary decisions.

The Supervisory Board renders its decisions with the simple majority of those present. The detailed rules of the operation of the Supervisory Board are set out in the Supervisory Board's rules of procedure.

The members of the Supervisory Board, the status of their independence and the date of their appointment in 2024 (the professional curriculum vitae of current members is available on the website of the Company, their name in the table below is shown in bold):

NAME	POSITION	DATE AND TERM OF ELECTION
Éva Hegedűs	independent / chairman	19/04/2023 – 31/05/2026
Krisztián Hall	independent	19/04/2023 – 31/05/2026
David William Moffat Thompson	independent	28/08/2018 – 31/05/2027
Sándor Székely, employee delegate	non-independent	11/05/2017 – 31/05/2027
Attila Verestóy, employee delegate	non-independent	08/04/2022 – 31/05/2027
Antal Botond Rencz	independent	12/04/2024 – 31/05/2027
Dr. Attila Végh	independent	20/04/2021 – 12/04/2024

The members of the Supervisory Board did not hold any Waberer's shares as at 31 December 2024.

AUDIT COMMITTEE

From the independent members of the Supervisory Board, the General Meeting elects an Audit Committee of at least 3 (three) members for a term of office equal to the term of each member's membership in the Supervisory Board. In the 2024 business year, the Audit Committee operated with 4 (four) members.

Members of the Audit Committee, their status and term of mandate (the professional curriculum vitae of current members is available on the website of the Company, their name in the table below is shown in bold):

NAME	POSITION	DATE AND TERM OF ELECTION
David William Moffat Thompson	independent / chairman	for a term equal to the term of Supervisory Board membership
Éva Hegedűs	independent	for a term equal to the term of Supervisory Board membership
Botond Rencz	independent	for a term equal to the term of Supervisory Board membership
Krisztián Hall	independent	for a term equal to the term of Supervisory Board membership
Dr. Attila Végh	independent	08/04/2022 - 12/04/2024

The Audit Committee assists the Supervisory Board in monitoring the financial and sustainability reporting system, selecting the auditor, and cooperating with the au-

ditor. The Audit Committee is entitled to use external consultant(s) as necessary to carry out its tasks. The Audit Committee oversees the effectiveness of risk man-

agement affecting financial and sustainability reporting, the operation of the internal control system, the selection of the auditor, and ensuring its independence.

NOMINATION AND REMUNERATION COMMITTEE

Based on powers granted by the Articles of Association, from among the non-executive members of the Board of Directors and the independent members of the Supervisory Board, the Board of Directors elects a Nomination and Remuneration Committee of at least 2 (two) members for a term of office equal to the term of each member's membership in the given committee. The body currently has 2 (two) members, elected to the position by the

Board of Directors through Board of Directors Resolution No. 7/2023. (23/05). The rules of procedure of the Nomination and Remuneration Committee are approved by the Board of Directors of the Company.

The purpose of this body is to make proposals and assist the Board of Directors in its personnel-related decisions in terms of employment, remuneration and incentives of employees in key positions. The Committee contributes to the

performance evaluation of key management personnel, to the formulation of the Group's Remuneration Policy, and gives its opinion on the Company's Remuneration Report.

Members of the Nomination and Remuneration Committee, their status and term of mandate (the professional curriculum vitae of current members is available on the website of the Company, their name in the table below is shown in bold):

NAME	POSITION	DATE AND TERM OF ELECTION
Róbert Barlai	independent	23/05/2023 – 31/05/2026, or, if earlier, the date of the Annual General Meeting
Krisztián Hall	independent	23/05/2023 – 31/05/2026, or, if earlier, the date of the Annual General Meeting

The Nomination and Remuneration Committee adopted a decision in writing without holding a meeting on the review of the remuneration report and policy submitted to the General Meeting, the nomination of committee members, the evaluation of

bonuses for key function holders for 2023, the announcement of bonuses for 2024, and the rate of annual wage increases.



INTERNAL CONTROLS AND RISK MANAGEMENT



WABERER'S

ESG COMMITTEE

The operation of the ESG Committee is presented in the chapter titled “ESG governance, the role and members of the ESG Committee” of the Sustainability Report.

INTERNAL CONTROLS AND RISK MANAGEMENT

SYSTEM OF INTERNAL CONTROLS

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 Company's financial statements are monitored by the segmental and central controlling functions, which are reviewed weekly by senior management and monthly by the Board of Directors.

An in-depth and comprehensive review of the financial statements takes place on a quarterly basis, when all the above-mentioned functions and bodies review the figures and messages to be published, and quarterly reports are also reviewed by the Audit Committee before publication.

The Company's internal control procedures are governed by the following principles:

SHARING RESPONSIBILITIES.

Each task is assigned to at least one function and manager.

SEPARATION OF RESPONSIBILITIES.

Corporate functions and employees have clearly identified and fixed responsibilities.

ties.

INDEPENDENT INTERNAL AUDIT FUNCTION.

The Internal Audit Department reports to the Supervisory Board and the Audit Committee.

TECHNOLOGICAL CONTROLS.

Where possible, technological – data-based – controls are implemented to prevent human error or misconduct. Records. Record-keeping procedures are implemented at all levels to ensure that the Company can track its past experience

RISK MANAGEMENT FRAMEWORK

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. In this context, the Company has defined its risk management policy as follows:

UNIVERSAL APPROACH.

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. These risks, assessed during the risk assessment interviews with the Group's managers, are mapped out in the annual audit planning process on a “risk map” according to the

probability of occurrence and the impact of occurrence, separating operational and market risks.

HOLISTIC APPROACH.

Daily risks are identified, assessed and managed at operational level. However, all risk factors and risk management practices should be examined and assessed at group level.

RISK FACTORS

Waberer's has identified five categories of risks that it faces in its business, and that are relevant to stakeholders such as in-

REGULAR MONITORING.

The development and management of risks is monitored at operational level, while strategic risks are monitored by the Audit Committee and the Board of Directors.

ORDER OF PRIORITY.

Audits under the annual internal audit plan,

and resources are allocated to place more emphasis on managing the risks that are most likely to occur and have the greatest potential impact.

EFFECTIVENESS OF RISK MANAGEMENT.

When choosing the method of risk management, the most effective tool is selected.

MARKET RISK FACTORS

Through its International Transport Segment, the Group operates in the multi-player transport and freight forwarding sector, which includes a number of European freight forwarding and logistics companies. With its EU-focused international freight services (hereinafter: "International Transport Segment"), the Group competes primarily with other road and rail carriers that provide long-haul transport services and freight forwarding services

vestors, customers or employees: market risk factors, regulatory risk factors, financial risk factors, operational risk factors

and insurance-specific risk factors.²

similar to those provided by the Group. In Hungary and in the Central and Eastern European region, the operating segment offering regional freight forwarding and logistics services (the "Regional Contract Logistics segment") competes primarily with other companies offering regional logistics, warehousing and distribution services in Hungary. Gránit Biztosító Zrt. and Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. (the "Insur-

ers"), which became part of the Group at the end of 2024, compete with other non-life and life insurers in Hungary. The Company, therefore, operates in a number of logistics-related markets in Europe and the Central and Eastern European region, and is exposed to a number of factors that could adversely affect the Group's business, operative profits/losses, financial status, cash flows, prospects and reputation.

These factors include, among others:

MACROECONOMIC RISKS.

Economic conditions that reduce the demand for logistics services or transport, or increase the supply of relevant services (in particular transport or distribution) may put pressure on rates or asset utilisation, thereby reducing asset productivity, particularly in market segments and industries where the Group's customers are concentrated (including FMCG, the automotive, logistics and electronics sectors), and in regions of Europe where the Group has significant business activities (including Hungary, Poland, Slovakia, Germany, Italy, France, Spain, the Netherlands, Belgium and the United Kingdom).

There are a number of specific factors that can adversely affect such general economic conditions, of which the most significant macroeconomic uncertainties are currently stagnating GDP at EU level and household consumption, but the continued weakening of the European integration and anti-EU political movements, as well as region-specific deterioration in economic performance or external trade relations in Central and Eastern Europe, also have a negative impact on the economic environment for logistics operators.

SECTOR SPECIFIC RISKS.

The European transport sector is exposed

to a number of risks that affect the profitability of the transport services provided by the Company. These risks can vary from country to country and include, for example, unexpected changes in taxes, customs duties, tolls, or employment and environmental regulations.

STRATEGY.

In 2023, the Group adopted an ambitious growth strategy, which included international acquisition plans, significant investments in logistics infrastructure, and the acquisition of customers with significant high value-added logistics services. Achieving growth may involve macroeco-

² The risk factors presented below are not intended to be an exhaustive list or explanation of all the risks that stakeholders may encounter when dealing with the Company, and should be used as a guide only. There may be other risks and uncertainties not currently known to the Group or which the Group currently considers to be intangible, but which individually or cumulatively could have a material adverse effect on the Group's business, results of operations, financial condition, cash flows and prospects. The order of risk factors described below is not based on the materiality or likelihood of occurrence of the factors.

conomic, market, implementation and technological risks.

CUSTOMER SERVICE.

In order to maintain and increase revenues and profitability, it is important that the Group retains its existing customers, and continues to acquire new customers all over its businesses. The Group's contract business is based on a competitive bidding process involving the Group and its competitors. There can be no assurance, however, that the Group's existing contracts will be renewed or that the Group will continue to participate successfully in future tenders. Given that there are significant differences in the profitability levels generated by the Group's customers, maintaining cooperation with customers that generate higher profit levels is critical to improving Group-wide performance.

EMPLOYEES AND KEY PERSONNEL.

Of all the employee groups, Waberer's identifies the group of drivers, warehouse workers and production support logistics workers as the most important element in its human resource management model. In the International Transport Segment (ITS), the Hungarian labour market is unable to provide suitable vehicle driver staff. In previous years, the efficient operation of the fleet was ensured by involving staff members of Romanian, Serbian, and Ukrainian nationality, but this labour market may also prove to be limited, so Waberer's has started involving workforce of Asian origin. The involvement of such staff may require a longer process and more administration, thus the short-term labour situation may result in a temporary driver shortage in the future as well. In the

coming years, it is conceivable that the recruitment of foreign labour may be necessary not only for international transport activities but also for domestic distribution and warehousing activities. In the medium term, major industrial investment projects in Hungary will generate significant labour demand, which may make it difficult to recruit the necessary number of workers. In anticipation of this risk, Waberer's continues to be present in the labour markets of the neighbouring countries (Serbia, Romania, Belarus), and is opening up to recruit workers from more distant countries, which can provide us with a significant long-term supply of workers.

SUPPLIERS AND SUBCONTRACTORS.

The Group relies on suppliers and service providers to provide it with certain specialised products and services, including, but not limited to, products and services related to the purchase of trucks, trailers, fuel and tolls. Of particular note are subcontractors related to transport and warehousing, on which the Company relies much more heavily to serve its customers. There is a risk that the Company may not be able to maintain business relationships with suppliers and subcontractors, or that suppliers and subcontractors may not be able to provide products and services to meet the Group's needs, or that the price or quality of the products and services they offer may change in an unfavourable direction.

ENVIRONMENTAL AND TECHNOLOGICAL RISKS.

Given the current significant environmental footprint of road transport, a possible tightening of CO₂ emissions could pose a

serious challenge to the transport industry. Although Waberer's Group is continuously testing and, as far as possible, deploying vehicles in the fleet that can be operated with a smaller environmental footprint, the technology is not yet at a level of maturity where current transport operations can be carried out with significant CO₂ emission reduction in the short term. Also to mitigate this risk, Waberer's has entered the rail logistics market through acquisition, but rail transport solutions will not be able to fully replace road transport with a higher environmental footprint.

FUEL AND ENERGY PRICE RISK.

Although the Company regulates the risks arising from significant increases in fuel prices in its customer contracts, significant fluctuations in fuel prices may lead customers to reconsider and possibly adjust their transport portfolio. The significant rise in electricity and gas prices has put the Company under significant cost pressure, which the Group is managing through investments in energy generation and efficiency improvements, and the introduction of contractual clauses similar to those used to manage fuel price changes.

GEOPOLITICAL RISKS.

Although the armed conflict in the Ukraine does not directly affect Waberer's operations, it could have a knock-on effect on the Group's operations through possible disruptions to customer supply chains, the availability of workers from the region, and the macroeconomic impact of the events. A possible escalation of the conflict could pose further, currently unknown, challenges for the Company.

REGULATORY RISK FACTORS

The Company's exposure relates to the regulatory environment of all the countries in which it operates, as well as to supra-national and intergovernmental rules, the most important of which is the European Union. This requires licences to operate the Group's transport, logistics and insurance branches. The most important rules for transport and logistics services, such

as international transport contract conditions, road safety policies, environmental standards and drivers' pay, working hours and other conditions, are regulated at national, EU and UN level. The most significant regulatory change for the cross-border road transport sector in Europe to date has been the introduction of the so-called "Mobility Package", which has

set common rules on, among other things, rest periods for drivers, minimum wage levels for drivers, and cabotage activities, which can have a significant impact on the Company's business activities. The long-term effects of the introduction of regulation and the risks involved in monitoring compliance remain unpredictable in the long term. In the shorter term, the Com-

pany sees a risk of possible increases in operating costs and specific fines resulting from possible breaches of operationally challenging rules, but in the longer term, the potentially higher cost levels generated by the regulation are expected to be incorporated into service prices.

We can consider the EU's regulatory

will to reduce the environmental footprint of road transport – and the domestic regulatory will to reflect this – to be regulatory risks. In the first instance, this regulatory objective will result in a significant increase in tolls for conventional-drive vehicles and, in the longer term, in a reduction in the weight of road transport. In

response to these regulatory objectives – and the market demand emerging in parallel – Waberer's is building up its rail logistics capabilities and is continuously testing the possibility of introducing alternative-drive vehicles and alternative fuels into its fleet.

FINANCIAL RISK FACTORS

The Company's financial risks include credit risk, liquidity risk, interest rate risk and foreign exchange risk.

CREDIT RISK.

Credit risk is the risk that the Group will suffer losses due to customers defaulting on contractual terms, which in the case of Waberer's is primarily the risk of default by customers. The Company uses commercial credit lines, and continuously monitors exposures and maturities to manage credit risk.

LIQUIDITY RISK.

Liquidity risk is the risk that the Group will not be able to meet its financial obligations as they fall due. Some of the financial liabilities relate to fleet leasing, while others are bonds and project loan-type liabilities. The repayment schedule for Waberer's Group's warehouse development project loan is aligned with the timing of the completion of the warehouse, while repayment of the principal of the corporate bond issued in 2022 is due from the 5th year after issuance.

FINANCING RISK

Financing risk refers to the availability of short and long-term financing solutions (including vehicle leases, short and long-term loan products, factoring facilities, bank guarantees, etc.) provided to the Company by banks and leasing companies, and the availability of external financing sources for future investment plans. Due to the Company's cash generation capacity and low indebtedness ratio, the funding risk is not significant in the short term. A repayment obligation may arise for the corporate bond issued in

2022 beyond factors that are considered standard covenants for similar types of financing solutions (e.g. *pari passu*, negative pledge, failure of investment plans, bankruptcy, liquidation, winding-up proceedings, non-payment of bond obligations, indirect breach of contract) if the Company's net indebtedness exceeds the 4x rate or if the Board of Directors of the Company proposes to the General Meeting a dividend payment higher than 30% of the relevant annual profit after tax.

FOREIGN EXCHANGE RISK.

Most of the income and expenses of the companies within the Group are in the Group's functional currency, the euro. For some Group members, the functional currencies are the Romanian leu, the Polish zloty and the Hungarian forint, and therefore fluctuations in the RON/EUR, PLN/EUR and HUF/EUR exchange rates are the Group's currency risk. Open foreign exchange positions arising from costs not incurred in EUR and not covered by revenues (natural hedge) are partially hedged by the Company through foreign exchange hedges.

INTEREST RATE RISK.

The Company has, among others, floating rate leases as interest-bearing debt obligations, which are currently not hedged, and which track the trends of market interest rates. However, the corporate bond issued in 2022 and the project loan for warehouse development have a fixed interest rate, so it does not generate any interest rate risk for the Company.

WAGE REGULATION AND TAX RISK.

From the perspective of the Company's tax profile and operating model, the most significant risk is considered to be tax and regulatory changes related to wages (e.g. minimum wage). It may take significant time for the Company to compensate for any changes that have a negative financial impact.

OPERATIONAL RISK FACTORS

Operational risks arise from the possibility that the Company may suffer losses due to internal weaknesses, possible failure of controls, operations or procedures. Such risks can arise from a number of factors, including:

FAILURE OF INTERNAL SYSTEMS OR PROCESSES.

The Group is exposed to operational risks arising from the failure of internal processes or systems to function properly, or from the failure or loss of internal processes or systems or from external events. The Group is exposed to risks arising from, among other things, fraud by employees or third parties, road accidents, unauthorised transactions and operational errors, clerical or record-keeping errors, and errors resulting from faulty computer or telecommunications systems.

PERFORMING WORK.

If Group employees are involved in a strike, walkout or other slowdown event, Group operations may be interrupted.

ADVERSE WEATHER CONDITIONS AND OTHER FORCE MAJEURE EVENTS.

The Group's activities are exposed to adverse weather conditions and natural disasters, unforeseen public health crises, an unstable political environment, and the consequences of the refugee crisis in Europe and potential disasters.

IMPROPER USE OF VEHICLES.

There is a risk that trucks and trailers

owned by the Group may be used illegally and that its agreements with drivers and customers are violated due to smuggling of goods, drug trafficking, illegal cross-border transport of persons and other illegal activities.

CYBER RISK.

The Group is exposed to cyber risks, as information is valuable and vulnerable in this business sector, and must be protected. The Group has internal rules on information security that can be applied in the design and implementation of business processes, solutions and services. Cyber risk is defined as any event that could lead to a data breach, financial loss, reputational damage and interruption of operations caused by the failure of technological systems and procedures.

RISK FACTORS SPECIFIC TO INSURANCE

The Insurer is exposed to specific risk characteristics, including but not limited to:

- Investigations carried out by the Hungarian Financial Supervisory Authority ("MNB");
- The operation of the Insurer is subject to the granting, renewal or continuation of licences and authorisations issued by the MNB;
- The Group's insurance coverage, when the Group acts as its own insurer, and the Group's reinsurance coverage may not provide effective coverage in all circumstances;
- The severity or frequency of claims against the Insurer may increase unexpectedly;
- Disasters and severe weather events can generate significant insurance claims;
- Adverse financial market conditions may significantly affect the ability of the Insurer to optimise its portfolio allocation and realise a profit on its investments;
- The Insurer operates in a specialised scope of the insurance market (vehicle and transport insurance services), and cannot compensate for any negative changes in this market in the short term with its business in other insurance submarkets;
- Changes to industry-specific special taxes affecting financial markets, including insurance markets.

FIGHT AGAINST CORRUPTION AND BRIBERY

Waberer's Group is committed to conducting business in a corruption and bribery-free manner, and condemns all forms of corruption, whether directly or indirectly related to the activities of the Group or its business partners, and all employees, partners and subcontractors are prohibited from engaging in or failing to engage in any conduct, in the broadest sense, that could lead to, or that would lead to, or contribute to, corruption or the influence of a third party. In addition, all of our business partners acknowledge the provisions of the Waberer's Group Code of Ethics as binding. Furthermore, in accordance with the CEO's Instruction on the Prevention of Money Laundering and Terrorist Financing, all employees, partners and subcontractors of the company expressly agree to contribute to the fight against the commission of crimes related to money laundering and terrorist financing.

The anti-corruption measures include the "four-eyes principle" enshrined in the Group's Articles of Association, i.e. signing on behalf of the Company may only be performed by two directors, or by one director and one authorised signatory, or by two signatories authorised by the Board of Directors. In addition, the Group has specific instructions for contracting and procurement that incorporate a multi-stage review and adjudication system into the contracting process and include minimum safeguards to screen out risky transactions. In addition, the Group's rules on the exercise of the right to authorise payments ensure that payments are made only after the joint approval by a content approver and an authorising officer. The acceptance of business gifts is governed by the Group's Conflict of Interest Policy, Procurement Policy, and the regulation on the accounting of business travel, representation, and business gift expenses.

Waberer's Group employees can report ethical or anti-corruption incidents by sending an email to visszaelesenk@waberers.com, and the investigation of cases is governed by the Group's procedure for handling notifications of breaches of ethical conduct and whistleblowing. The purpose of the whistleblowing system is to provide an appropriate reporting forum and procedure for employees in the event of behaviour that violates ethical workplace conduct rules. The whistleblowing system allows for the detection, sanctioning of abuses, and the establishment

of corrective measures. The Company establishes and maintains secure reporting channels that are suitable for preventing retaliatory measures against whistleblowers. The abuse/breach investigation procedure is in accordance with the applicable labour, civil law and criminal law provisions.

2024

SUSTAINABILITY REPORT



WABERER'S

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GENERAL INFORMATION

For Waberer's Group¹, 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 Standards²)**.

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 ³) 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.

¹ 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.

² 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

³ 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) ⁴ 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.

⁴ DIRECTIVE (EU) 2022/2464 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting

- 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.

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.

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-

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

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 strategic

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"> Europe 	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"> Europe 	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"> Poland Romania Slovakia Serbia Hungary 	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"> Poland Romania Slovakia Hungary 	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"> For example: Germany France Great Britain Spain Italy Austria Slovakia Hungary 	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"> For example: Germany France Great Britain Spain Italy Austria Slovakia Hungary 	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"> Poland Romania Slovakia Hungary 	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"> Poland Hungary 	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"> Europe 	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"> Hungary (Budapest) Slovakia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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"> Hungary Slovakia Serbia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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"> Hungary (Budapest, Páty, Győr, Miskolc) Slovakia Serbia 	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 co-operating 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
ENVIRONMENTAL: ESRS E1 – CLIMATE CHANGE					
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
SOCIAL: ESRS S2 – WORKERS IN THE VALUE CHAIN					
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
SOCIAL: ESRS S4 – INFORMATION-RELATED IMPACTS ON CONSUMERS AND END-USERS					
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
SOCIAL: S – ENTITY-SPECIFIC					
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
ECONOMIC: ESRS G1 – BUSINESS CONDUCT					
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
ECONOMIC: G – ENTITY-SPECIFIC					
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 the 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

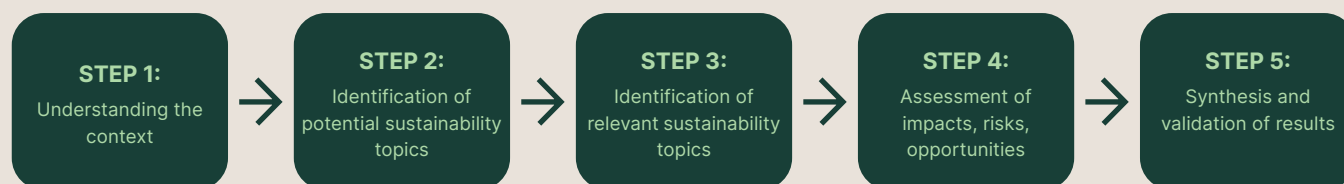
The 2024 financial year is the first in which the Company publishes its sustainability report under the Corporate Sustainability Reporting Directive (CSRD). The Company's double materiality assessment was

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
	ESRS 2	30		
	BASIS FOR THE PREPARATION OF THE REPORT	30		
[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		
	GOVERNANCE	34		
[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		
	STRATEGY	41		
[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		
	IMPACT, RISK AND OPPORTUNITY MANAGEMENT	67		
	DISCLOSURES ON THE MATERIALITY ASSESSMENT PROCESS	67		
[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		
	MINIMUM DISCLOSURE REQUIREMENT ON POLICIES AND ACTIONS	78		
[MDR-P]	Policies adopted to manage material sustainability matters	78		
[MDR-A]	Actions and resources in relation to material sustainability matters	78		
	ESRS 1	79		
	ENVIRONMENTAL INFORMATION	79		
	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]	SOCIAL INFORMATION	107		
	OWN WORKFORCE	107		
[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]	WORKERS IN THE VALUE CHAIN	135		
[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]	CONSUMERS AND END-USERS	138		
[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		
	GOVERNANCE INFORMATION	151		
[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 legislation⁵

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		

⁵ 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 DNSH⁶ 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-

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)				Essential Contribution Criteria						DNSH Criteria (Compliance with the Do No Significant Harm Principle)									
	Code(s) (2)	Sales revenue (3)	Proportion of turnover, 2024 (4)	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)	Proportion of Taxonomy-aligned (A1) or -eligible (A2) turnover, year N-1 (18)	Category: enabling activity (19)	Category: transitional activity (20)
		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
A. Taxonomy-eligible activities																			
A1. Environmentally sustainable (Taxonomy-aligned) activities																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (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)																			
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			

Explanation of notations:

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

[illegible]

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)				ESSENTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA (COMPLIANCE WITH THE DO NO SIGNIFICANT HARM PRINCIPLE)									
	Code(s) (2)	OpEx (3)	Share of OpEx, 2024 (4)	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)	Proportion of Taxonomy-aligned (A1) or -eligible (A2) OpEx, year N-1 (18)	Category: enabling activity (19)	Category: transitional activity (20)
		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
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A1. Environmentally sustainable (Taxonomy-aligned) activities																			
Environmentally sustainable (Taxonomy-aligned) activities OpEx (A1.)	0	0%															0%		
Of which enabling	0	0%																	
Of which transitional	0	0%																	
A2. Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
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. TAXONOMY-NON-ELIGIBLE ACTIVITIES																	
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 powertrains 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 ESRs 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) ⁷
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-

⁷ 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
Green services	
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
Reducing emissions	
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 International-

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 consumption,

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) ⁸	0	0	0	0	0	n/a	n/a
Fuel consumption from crude oil and petroleum products (MWh) ¹²	777,843	25	146	0 ⁹	778,014	n/a	n/a
Fuel consumption from natural gas (MWh) ¹²	2,821	0	202	95	3,118	n/a	n/a
Fuel consumption from other fossil sources (MWh) ¹²	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) ¹²	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

⁸ 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.

⁹ 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 ¹² (MWh/EUR thousand) ¹⁰	-	-	-	-	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

¹⁰ 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 (Department for Environment, Food & Rural Affairs) 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.

7. Employee commuting	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.
8. Upstream leased assets	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.
9. Downstream transportation	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.
10. Processing of sold products	The Scope 3 category would be applicable for products, but it is not relevant for the services provided by the Company.
11. Use of sold products	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.
12. End-of-life treatment of sold products	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.
13. Downstream leased assets	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.
14. Franchises	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.
15. Investments	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
Gross Scope 1 GHG emissions (tCO₂eq)¹¹	196394
Percentage of Scope 1 GHG emissions from regulated emissions trading systems (%)	-
Biogenic – GHG emissions not included in Scope 1	n/a
Gross Scope 2 location-based GHG emissions (tCO₂eq)¹²	3940
Gross Scope 2 market-based GHG emissions (tCO₂eq)	-
Biogenic – GHG emissions not included in Scope 2	n/a
Gross Scope 3 GHG emissions (tCO₂eq)¹³	158415
1. Purchased goods and services	n/a
[Optional sub-category: Cloud computing and data centre services]	n/a
2. Capital goods	n/a
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	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
9. Downstream transportation	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
15. Investments	4,423
Biogenic – GHG emissions not included in Scope 3	n/a
Total GHG emissions (location-based) (tCO₂eq)	358749
Total GHG emissions (market-based) (tCO₂eq)	-
Total GHG emissions per net revenue (location-based) (tCO₂eq /EUR THOUSAND)¹⁴	0.5
Total GHG emissions per net revenue (market-based) (tCO₂eq /EUR THOUSAND)	-

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, CO₂

¹² GHGs included in the calculation: CO₂

¹³ GHGs included in the calculation: CO₂

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-

suring 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 Szervíz 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) ¹⁵
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

¹⁵ 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 Plan¹⁶ 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.

¹⁶ The Equal Opportunities Plan was established based on the provisions of Section 21 of Act CXXXV 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 co-operation 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 concerned¹⁷. 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

¹⁷ 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 op-

portunity 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 visszaelesenek@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-

cators 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)
Training and developing employees, increasing engagement	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)
Improving working conditions (pay, working hours, health and safety, comfort, environment)	Maintaining employee satisfaction surveys, translating results into action plans
	Improving road safety for employees
Harnessing the potential of diversity	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
Training and developing employees, increasing engagement	Development of an annual training plan for white-collar workers and managers, increasing employee knowledge level regarding environmentally-friendly solutions.
Improving working conditions (pay, working hours, health and safety, comfort, environment)	Increasing the proportion of part-time and remote workers to create a work-life balance
	Review of male-female pay ratios in identical positions.
	Supporting employees with disabilities or reduced capacity for work: making buildings accessible.
Harnessing the potential of diversity	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 31/12/2024¹⁸, 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) ¹⁹	
FEMALE	1,203
MALE	5,366
OTHER	-
NO INFORMATION	-
TOTAL EMPLOYEES ²⁰	6,569

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

- | | | |
|----------------------------------|------------------------------------|-----------------------------|
| I. Hungary | f. WSZL KFT. | I. WPL-LOG ZRT. |
| a. WABERER'S INTERNATIONAL NYRT. | g. WSZL AUTOMOTÍV KFT. | II. Poland |
| 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. Slovakia |
| 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. Romania |
| | | 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) ²¹	Female	860
	Male	4,446
	Other	0
	No information	0
	TOTAL	5,306
Number of temporary employees (headcount) ²²	Female	179
	Male	478
	Other	0
	No information	0
	TOTAL	657

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

²⁰ 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.

²¹ Employees employed full-time and under employment contract.

²² Headcount employed under full-time temporary staffing arrangements. The headcount includes 574 persons who were part of the temporary work-force 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) ²³	Female	57
	Male	47
	Other	0
	No information	0
	TOTAL	104
Total number of employees (headcount)	Female	1,096
	Male	4,971
	Other	0
	No information	0
	TOTAL	6,067
SLOVAKIA		
Number of permanent employees (headcount)	Female	12
	Male	29
	Other	0
	No information	0
	TOTAL	41
Number of temporary employees (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	TOTAL	0
Number of employees with non-guaranteed hours (headcount)		
		0
Total number of employees (headcount)	Female	12
	Male	29
	Other	0
	No information	0
	TOTAL	41
ROMANIA		
Number of permanent employees (headcount)	Female	17
	Male	17
	Other	0
	No information	0
	TOTAL	34

²³ 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
	TOTAL	0
Number of employees with non-guaranteed hours (headcount)	Female	1
	Male	0
	Other	0
	No information	0
	TOTAL	1
Total number of employees (headcount)	Female	18
	Male	17
	Other	0
	No information	0
	TOTAL	35
POLAND		
Number of permanent employees (headcount)		
		0
	TOTAL	426
Number of temporary employees (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	TOTAL	0
Number of employees with non-guaranteed hours (headcount)	Female	0
	Male	0
	Other	0
	No information	0
	TOTAL	0
Total number of employees (headcount)	Female	77
	Male	349
	Other	0
	No information	0
	TOTAL	426
ALL COUNTRIES		
Total number of employees	Female	1,203
	Male	5,366
	Other	0
	No information	0
	TOTAL	6,569

The logistics sector is characterised by a high turnover rate, and therefore the Company places particular emphasis²⁴ 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 Tetherautó 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.

²⁴ 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 ²⁵	
Hungary	89%
Slovakia	100%
Romania	100%
Poland	100%
TOTAL	90%

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 2024²⁶ 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 ²⁷	
Hungary ²⁸	89%
Slovakia	100%
Romania	100%
Poland	0%
TOTAL	83%

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.

²⁵ 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.

²⁶ 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.

²⁷ 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.

²⁸ 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%
TOTAL	78	100%

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 2024:²⁹

AGE DISTRIBUTION OF THE COMPANY’S EMPLOYEES

	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE								INSURANCE BUSINESS LINE			
	Hungary ³⁰		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.

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

³⁰ 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 disabilities³¹, as well as for those with reduced capacity for work³².

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 WORK³³

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

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 line³⁴ conducted performance assessments for international truck drivers³⁵, 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^{36,37}

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

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^{38,39}

Female	2.25 hours
Male	3.45 hours
Other	-
No information	-
TOTAL	3.25 hours

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.

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

³⁷ 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.

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

³⁹ 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

leave⁴⁰ 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%.⁴¹

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

	TRANSPORT-FREIGHT FORWARDING-LOGISTICS BUSINESS LINE								INSURANCE BUSINESS LINE			
	Hungary		Slovakia		Romania		Poland		Gránit Biztosító		Magyar Posta Biztosítók	
	Head-count	Proportion (%)	Head-count	Proportion (%)	Head-count	Proportion (%)	Head-count	Proportion (%)	Head-count	Proportion (%)	Head-count	Proportion (%)
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
TOTAL	1,412	28%	1	2%	5	14%	7	2%	32	35%	71	29%

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 Autómotív 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 ⁴³	3%	8%
Romania ⁴⁴	White-collar	39%	42%
Slovakia ⁴⁵	White-collar	19%	23%
	Blue-collar	n/a ⁴⁶	n/a
Poland ⁴⁷	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% ⁴⁸

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.⁴⁹

The full annual compensation ratio⁵⁰ 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 2024⁵¹:

NUMBER OF TEMPORARY EMPLOYEES (PERSONS) ⁵²	
Female	177
Male	478
Other	0
No information	0
TOTAL	655

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 2024⁵³.

⁵¹ 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.

⁵² Number of full-time employees employed under full-time temporary staffing arrangements.

⁵³ 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)⁵⁴

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 Ecser. 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.

⁵⁴ 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,

data 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) ⁵⁵
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.

⁵⁵ 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 coopera-

tion, 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 Gyermekvédelő 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 supervisory 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) ⁵⁶
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

⁵⁶ 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.⁵⁷

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 factoring⁵⁸ 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 Act⁵⁹, 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

⁵⁸ 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.

⁵⁹ 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 sub-contractors, 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 Szállítmányozási és Logisztikai Kft.	133	157
Total	398	484

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.

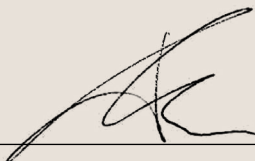
MANAGEMENT DECLARATION

I, the undersigned, confirm that WABERER'S INTERNATIONAL Nyrt.. takes full responsibility that the financial statements including the Waberer's Group's results for the period between January and December 2024 published today have been prepared based on the applicable accounting laws and are based on my best judgement and on the information at my disposal. The financial statements give true and fair view of the consolidated financial position of the WABERER'S INTERNATIONAL Nyrt. and the consolidated entities, describe main risks and uncertainties, present major events and transactions that occurred during the reporting period as well as their effects on the financial position of Waberer's International Nyrt. and the companies included in the consolidation.

Budapest, 31 March 2025.



Barna Zsolt
CEO & Chairman of the BoD



Tóth Szabolcs Gábor
Deputy CEO – Finance & Strategy

| **INDEPENDENT
AUDIT REPORT**

| **CONSOLIDATED
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| **NOTES**



INDEPENDENT AUDITOR'S REPORT

To the shareholders of WABERER'S INTERNATIONAL Nyrt.

Report on the audit of the consolidated financial statements

Opinion

We have audited the consolidated financial statements of WABERER'S INTERNATIONAL Nyrt. (the "Company") and its subsidiaries (together the "Group") included in the digital file 5493006YOYPOSXPIQG40-2024-12-31-o-hu.zip (SHA 256 HASH algorithm value: bdo8ae82bcf4f9dc5b07a7ac172c992bf6c8acaab6a712a4473cc4ac5882c775) for the financial year ended on 31 December 2024 which comprise the consolidated statement of financial position as at 31 December 2024 (in which total assets equal to total liabilities and equity are TEUR 1,124,902), the consolidated statement of comprehensive income (in which the total comprehensive income is TEUR 10,649 profit), the consolidated statement of changes in equity, the consolidated cash flow statement for the financial year then ended and the notes to the consolidated financial statements comprising material accounting policy information and other explanatory information.

In our opinion, the consolidated financial statements give a true and fair view of the consolidated financial position of the Group as at 31 December 2024, and of its consolidated financial performance and its consolidated cash flows for the financial year then ended in accordance with International Financial Reporting Standards ("IFRS") as adopted by the European Union ("EU") and they have been prepared, in all material respects, in accordance with the supplementary requirements of Act C of 2000 on Accounting ("Accounting Act") relevant for the consolidated annual financial statements prepared in accordance with IFRS as adopted by the EU.

Our opinion is consistent with our additional report to the audit committee dated 31 March 2025.

Basis for opinion

We conducted our audit in accordance with Hungarian National Standards on Auditing ("HNSA") and with applicable laws and regulations in force in Hungary. Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the consolidated financial statements" section of our report.

We are independent of the Group in accordance with the applicable laws of Hungary, with the Hungarian Chamber of Auditors' Rules on ethics and professional conduct of auditors and on disciplinary process and, for matters not regulated in the Rules, with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and we also comply with further ethical requirements set out in these.

The non-audit services that we have provided to the Company and its controlled entities within the EU in the period from 1 January 2024 to 31 December 2024 are disclosed in note 42 to the consolidated financial statements.

To the best of our knowledge and belief, we declare that non-audit services that we have provided to the Company and its controlled entities within the EU are in accordance with the applicable laws and regulations in Hungary and that we have not provided non-audit services that are prohibited under Article 5 of Regulation of the European Parliament and Committee No 537/2014 and Subsection (1) and (2) of Section 67/A of Act LXXV of 2007 on the Chamber of Hungarian Auditors, the Activities of Auditors, and on the Public Oversight of Auditors.



We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Our audit approach

Overview

Overall group materiality

Overall group materiality applied was TEUR 2,538.

Group Scoping

In addition to the parent company WABERER'S INTERNATIONAL Nyrt., we included six subsidiaries in our audit, WSZL Szállítmányozási és Logisztikai Kft., NexwaysCargo Kft., Gránit Biztosító Zrt., Magyar Posta Biztosító Zrt., Magyar Posta Életbiztosító Zrt. and LINK Sp. z.o.o which are operating in two countries, Hungary and Poland respectively. These seven companies represent 91% of the consolidated revenue and 97% of the consolidated EBITDA.

Key Audit Matters

- Recognition and disclosure of acquisitions during the financial year
- Goodwill impairment assessment
- Revenue recognition in the correct period

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the consolidated financial statements. In particular, we considered where management made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters, consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the consolidated financial statements are free from material misstatement. Misstatements may arise due to fraud or error. They are considered material if individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the consolidated financial statements.

Based on our professional judgement, we determined certain quantitative thresholds for materiality, including the overall materiality for the consolidated financial statements as a whole as set out in the table below. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing and extent of our audit procedures and to evaluate the effect of misstatements, if any, both individually and in aggregate on the consolidated financial statements as a whole.



<i>Materiality</i>	TEUR 2,538
<i>Determination</i>	2.5% of the consolidated adjusted EBITDA
<i>Rationale for the materiality benchmark applied</i>	<p>We chose consolidated adjusted EBITDA (operating profit increased by depreciation and amortization and the share of EBITDA from associates and joint ventures.) as the benchmark because, in our view, it is the benchmark against which the performance of the Group is most commonly measured by users, and it is a generally accepted benchmark.</p> <p>We chose 2.5%, which is consistent with quantitative materiality thresholds used for profit-oriented companies in this sector.</p>

Group audit scope

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the consolidated financial statements as a whole, taking into account the structure of the Group, the accounting processes and controls, and the industry in which the Group operates.

We have identified 6 subsidiaries, which, in our view, required an audit of their complete financial information, due to their financial significance or risk to the Group. Those reporting components are operating in Hungary and Poland.

For the remaining components we performed analytical review on Group level. This together with additional procedures performed at the Group level, including testing of consolidation journals and intercompany eliminations, gave us the evidence we needed for our opinion on the Group financial statements as a whole.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key audit matters

How our audit addressed the key audit matters

Recognition and disclosure of acquisitions during the financial year

The group closed significant acquisitions during the financial year with Corvinus Nemzetközi Befektetési Zrt., which is a state-owned entity.

The Group presents information related to the acquisition in notes 6. a) Goodwill, 8. Investments in subsidiaries, associates, and joint ventures, and 41. Subsequent events.

We performed audit work related to the significant acquisitions during the year and assessed whether their recognition and presentation are in line with the requirements of IAS 1 *Presentation of Financial Statements* and IFRS 3 *Business Combinations* standards.



On 29 November 2024, Gránit Biztosító Zrt. acquired a 66.925% share of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt., and gained control, therefore recorded them as subsidiaries in the amount of EUR 55,202 thousand. The acquisition resulted in a preliminary goodwill of EUR 404 thousand. The acquired Posta Biztosító entities were consolidated in accordance with the full consolidation method as of 31 December 2024.

Because of the significance of these acquisitions, we considered their recognition and presentation in the financial statements to be a key audit matter.

We assessed whether the acquisition was carried out at arm's lengths and compared the considerations stated in the acquisition contracts with the bank statements.

We evaluated the preliminary purchase price allocation prepared by the group and compared it with the acquisition contracts as well as the long-term business plans of these entities and read the 31 December 2024 audited financial statements of the acquired companies. We read the related due diligence and valuation reports prepared by the experts supporting management in the acquisitions.

We have assessed key internal controls operated by the acquired Companies with the aim of determining the fair values of investment portfolios in line with *IFRS 9 Financial instruments*. We tested the valuation of the investment portfolio, and compared market prices applied to the publicly available market prices. We assessed whether the methodology applied for the measurement of investment portfolios was compliant with *IFRS 9 Financial instruments* with the support of our internal modelling experts.

The value of customer relationships of Magyar Posta Biztosító Zrt. is recognized as an intangible asset. We assessed whether the methodology used in the valuation is in line with generally accepted valuation principles and *IFRS 3 Business combinations*. We compared the parameters used in the valuation to the expectations of our experts and performed an independent sensitivity analysis.

We read notes 6. a) Goodwill, 8. Investments in subsidiaries, associates, and joint ventures, and 41. Subsequent events of the consolidated financial statements in order to assess whether they are in line with the requirements of *IAS 1 Presentation of Financial Statements* and *IFRS 3 Business Combinations* standards.



Goodwill impairment assessment

The Group's Goodwill amounts to EUR 18,293 thousand as of 31 December 2024 in the consolidated financial statements.

Details of the nature of the goodwill impairment assessment performed by management are given in notes 3. e) Intangible assets and 6. a) Goodwill.

Impairment assessment involves significant estimates that are sensitive to changes in assumptions, in particular input variables, discount rate and assumptions underlying future operating cash flows.

Management concluded that there was no need for impairment of goodwill.

Because the impairment assessment of goodwill requires significant management estimates we considered it as a key audit matter.

We agreed the cash-flow forecasts used in the impairment assessment to forecasts approved by the board of directors. We considered management's expectations in respect of material impacts of the external environment and planned operational improvements and whether these were appropriately reflected in the cash-flow forecasts.

We compared actual historical cash-flow performance with forecasts and determined whether any differences fell within an acceptable range.

We independently calculated the weighted average cost of capital with reference to market data.

We assessed the sufficiency of the sensitivity analysis performed by management and performed further sensitivity analysis primarily focusing on changes in operating cash-flows.

We read notes 3. e) Intangible assets and 6. a) Goodwill of the consolidated financial statements in order to assess whether they are in line with the requirements of *IAS 1 Presentation of financial statements* and *IAS 36 Impairment of assets*.

Revenue recognition in the correct period

The Group's revenue in 2024 is EUR 757,467 thousand, therefore it is significant from the consolidated financial statements point of view. Revenue excluding insurance revenue from the total consolidated revenue is EUR 677,293.

The Group presents the information related to revenue in notes 3 (I) Revenues, 5. Segment information and 22. Revenues and intermediated services of the financial statement.

Revenue is recognized when the criteria of the 5-step model according to *IFRS 15 Revenue from Customer Contracts* are met. The Group considers revenue as a significant performance indicator, which can encourage sales revenue to

Our audit procedures included, among others, the understanding of the revenue recognition process. In addition, we tested the correspondence of the revenue recognised in the current year with the issued invoices and the financial consideration received, and if the criteria of the 5-step model according to *IFRS 15 Revenue from Customer Contracts* are met.

We tested on a sample basis the receivables from the customers at the balance sheet date.

In order to assess whether the revenue was recorded in the correct period, we tested



be accounted for before the criteria of the above 5-step model are met.

Based on the above, we considered the recognition of revenue in the correct period to be a key audit matter.

transactions before and after the balance sheet date as well as credit notes issued after the balance sheet date on a sample basis.

Furthermore, we examined whether the Group discloses the information related to revenue in the consolidated financial statements in accordance with *IFRS 15 Revenue from Customer Contracts* standard.

Other information

Other information comprises the consolidated business report which is named consolidated management report in the annual report of the Group for the financial year ended on 31 December 2024. Management is responsible for the preparation of the consolidated business report in accordance with the provisions of the Accounting Act and other relevant regulations, including the preparation of the consolidated sustainability statement as part of the consolidated business report in accordance with Section 134/I of the Accounting Act, and for the preparation of the annual report in accordance with Act CXX of 2001 on Capital Market. Our opinion on the consolidated financial statements does not cover the consolidated business report or the annual report.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If based on our work performed we conclude that the other information is materially misstated, we are required to report this fact, and based on the Accounting Act, also the nature of the misstatement.

Based on the Accounting Act, it is also our responsibility to consider whether the consolidated business report has been prepared in accordance with the provisions of the Accounting Act (not including requirements of Chapter VI/C on sustainability statement) and other relevant regulations, if any, and to express an opinion on this and on whether the consolidated business report is consistent with the consolidated financial statements.

In the course of fulfilling our obligation, in respect of forming our opinion on the consolidated business report we have considered the requirements set out in the Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 on Supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format ("ESEF Regulation") as the regulation prescribing further requirements for the consolidated business report.

Because the Company's transferable securities are admitted to trading on a regulated market of a Member State of the European Economic Area, our opinion on the consolidated business report shall cover the information prepared under Paragraphs e) and f) of Subsection (2) of Section 95/B, and state whether the information referred to in Paragraphs a)-d), g) and h) of Subsection (2) of Section 95/B of the Accounting Act has been provided.

Based on the regulation of Section 134/I of the Accounting Act, the Group is obliged to prepare consolidated sustainability statement, thus we shall state whether the consolidated business report includes the consolidated sustainability statement required by Chapter VI/C of the Accounting Act.



In our opinion the other information is consistent, in all material respects, with the consolidated financial statements as at 31 December 2024, and the consolidated business report is consistent, in all material respects, with the provisions of the Accounting Act (not including requirements of Chapter VI/C on sustainability statement), and the other relevant regulation referred to above.

We are not aware of any other material inconsistency or material misstatement in the other information, therefore we have nothing to report in this respect.

We state that the information referred to in Paragraphs a)-d), g) and h) of Subsection (2) of Section 95/B of the Accounting Act has been provided.

We state that the consolidated business report includes the consolidated sustainability statement required by Chapter VI/C of the Accounting Act.

We issue another report based on a limited assurance engagement on whether the consolidated sustainability statement complies with the requirements of Chapter VI/C of the Accounting Act relating to consolidated sustainability statements.

Responsibilities of management and those charged with governance for the consolidated financial statements

Management is responsible for the preparation of the consolidated financial statements that give a true and fair view in accordance with IFRS as adopted by the EU and to prepare the consolidated financial statements in accordance with the supplementary requirements of the Accounting Act relevant for the consolidated annual financial statements prepared in accordance with IFRS as adopted by the EU, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

Auditor's responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with HNSAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with HNSAs, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.



- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that gives a true and fair view.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purpose of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on other legal and regulatory requirements

Appointment

We were first appointed as auditors of the Group on 8 April 2022 for three years, representing a total period of uninterrupted engagement appointment of 3 years. Our appointment for the year ended 31 December 2024 was approved by the shareholders' resolution on 8 April 2022.

The engagement partner on the audit resulting in this independent auditor's report is Mészáros Balázs Árpád.



Report on the compliance of the presentation of the consolidated financial statements with the requirements of the regulation on the European single electronic format

We have undertaken a reasonable assurance engagement on the compliance of the presentation of the consolidated financial statements of the Group included in the digital file 5493006YOYPOSXPIQG40-2024-12-31-0-hu.zip (“consolidated financial statements in ESEF format”) with the requirements set out in the ESEF Regulation.

Responsibilities of the management and those charged with governance for the consolidated financial statements in ESEF format

The management is responsible for the presentation of the consolidated financial statements in ESEF format that comply with the ESEF Regulation. This responsibility includes:

- the preparation of the consolidated financial statements in the applicable XHTML format;
- the selection and application of appropriate iXBRL tags as required by ESEF Regulation using judgement where necessary, including the full application of relevant tags and the proper creation and linking of extension elements; and
- the design, implementation and maintenance of internal control relevant to the application of the ESEF Regulation.

Those charged with governance are responsible for overseeing the Group’s financial reporting process including compliance with the ESEF Regulation.

Our responsibility and summary of the work performed

Our responsibility is to express an opinion on whether the presentation of the consolidated financial statements in ESEF format complies, in all material respect, with the requirements of the ESEF Regulation based on the evidence we have obtained. We conducted our reasonable assurance engagement in accordance with Hungarian National Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (ISAE 3000).

A reasonable assurance engagement in accordance with ISAE 3000 involves performing procedures to obtain evidence about compliance with the ESEF Regulation. The nature, timing and extent of procedures selected depend on the auditor’s judgement, including the assessment of the risks of material departures from the requirements set out in the ESEF Regulation whether due to fraud or error. Our reasonable assurance engagement included obtaining an understanding of the tagging, obtaining an understanding of the Group’s internal controls relevant to the application of the requirements of the ESEF Regulation, and verifying whether the XHTML format was applied properly., evaluating the completeness of the Group’s tagging of the consolidated financial statements using the XBRL markup language, evaluating the appropriateness of the Group’s use of iXBRL elements selected from the ESEF taxonomy and the creation of extension elements where no suitable element in the ESEF taxonomy has been identified and evaluating the use of anchoring in relation to the extension elements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

*Opinion*

In our opinion, the presentation of the consolidated financial statements in ESEF format of the Group's for the financial year ended 31 December 2024 included in the digital file 5493006YOYPOSXPIQG40-2024-12-31-o-hu.zip complies, in all material respects, with the requirements of the ESEF Regulation.

Budapest, 31 March 2025

Mészáros Balázs Árpád
Statutory auditor
Licence number: 005589
PricewaterhouseCoopers Könyvvizsgáló Kft.
1055 Budapest, Bajcsy-Zsilinszky út 78.
Licence number: 001464

Translation note:

This English version of our report is a translation from the original version prepared in Hungarian on the consolidated financial statements prepared in Hungarian. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this English translation.



Independent practitioner's limited assurance report on WABERER'S INTERNATIONAL Nyrt.'s consolidated sustainability statement

To the shareholders of WABERER'S INTERNATIONAL Nyrt.

Limited assurance conclusion

We have conducted a limited assurance engagement on the consolidated sustainability statement of WABERER'S INTERNATIONAL Nyrt. (the "Company"), included in consolidated sustainability statement of the Company's consolidated management report, as at 31 December 2024 and for the year then ended.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the consolidated sustainability statement is not prepared, in all material respects, in accordance with Section 134/I-K. of Act C on Accounting implementing Article 29(a) of EU Directive 2013/34/EU, including:

- compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Company to identify the information reported in the consolidated sustainability statement (the "Process") is in accordance with the description set out in note 1.5.1.2 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities; and
- compliance of the disclosures in subsection 2.1 EU Taxonomy within the environmental information section of the consolidated sustainability statement with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

Basis for conclusion

We conducted our limited assurance engagement in accordance with Hungarian National Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* ("ISAE 3000 (Revised)"), and, in respect of the greenhouse gas statement, Hungarian National Standard on Assurance Engagements 3410, *Assurance engagements on greenhouse gas statements* ("ISAE 3410"), as issued by the International Auditing and Assurance Standards Board and adopted by the Hungarian Chamber of Auditors.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

Our independence and quality management

We have complied with the applicable laws of Hungary, with the Hungarian Chamber of Auditors' Rules on ethics and professional conduct of auditors and on disciplinary process and, for matters not regulated in the Rules, with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour and we also comply with further ethical requirements set out in these.

Our Firm applies International Standard on Quality Management (ISQM) 1 (Quality management for firms that perform audits or reviews of financial statements, or other assurance or related services engagements), which requires the firm to design, implement and operate a system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



Emphasis of matter

We draw attention to Section 1.1.1 of the consolidated sustainability statement which explains that the ESEF taxonomy for sustainability reporting has not yet been adopted and therefore the Company was unable to mark the disclosures included in the consolidated sustainability statement prepared in the electronic reporting format (XHTML) specified in Commission Delegated Regulation (EU) 2019/815 according to the relevant ESEF taxonomy, including the disclosures required by Article 8 of Regulation (EU) 2020/852, as required by Section 134/J. of the Accounting Act. Section 134/L. of the Act C on Accounting requires us to provide a limited assurance conclusion on the compliance with the above requirement, however, for the above reason we cannot draw any conclusions in this regard.

Our conclusion is not modified in respect of this matter.

Responsibilities for the consolidated sustainability statement

Management of the Company is responsible for designing and implementing a process to identify the information reported in the consolidated sustainability statement in accordance with the ESRS and for disclosing this Process in note 1.5.1.2 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities of the consolidated sustainability statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Management of the Company is further responsible for the preparation of the consolidated sustainability statement in accordance with Section 134/I-K. of the Act C on Accounting implementing Article 29(a) of EU Directive 2013/34/EU, including:

- compliance with the ESRS;
- preparing the disclosures in subsection 2.1 EU Taxonomy within the environmental information section of the consolidated sustainability statement, in compliance with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation");
- designing, implementing and maintaining such internal control that management determines is necessary to enable the preparation of the consolidated sustainability statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.



Inherent limitations in preparing the consolidated sustainability statement

In reporting forward-looking information in accordance with ESRS, management of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

As discussed in note 2.3.1 [E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions to the consolidated sustainability statement, greenhouse gas quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the consolidated sustainability statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the consolidated sustainability statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) and ISAE 3410 we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the consolidated sustainability statement, in relation to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Considering whether the information identified addresses the applicable disclosure requirements of the ESRS; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Company's description of its Process set out in note 1.5.1.2 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities.

Our other responsibilities in respect of the consolidated sustainability statement include:

- Identifying where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures responsive to where material misstatements are likely to arise in the consolidated sustainability statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence about the consolidated sustainability statement. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the consolidated sustainability statement, whether due to fraud or error.



In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
 - reviewing the Company's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Company was consistent with the description of the Process set out in note 1.5.1.2 [IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities.

In conducting our limited assurance engagement, with respect to the consolidated sustainability statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its consolidated sustainability statement by:
 - Obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the consolidated sustainability statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Evaluated whether the information identified by the Process is included in the consolidated sustainability statement;
- Evaluated whether the structure and the presentation of the consolidated sustainability statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected information in the consolidated sustainability statement;
- Performed substantive assurance procedures on selected information in the consolidated sustainability statement;
- Where applicable, compared disclosures in the consolidated sustainability statement with the corresponding disclosures in the financial statements and business report;
- Evaluated the methods, assumptions and data for developing estimates and forward-looking information;
- Obtained an understanding of the Company's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the consolidated sustainability statement.



Other Matters

The comparative information included in the Company's consolidated sustainability statement, as of 31 December 2023 and for the financial year then ended, was not included in the scope of our limited assurance engagement.

Our conclusion is not modified in respect of this matter.

Budapest, 31 March 2025

Mészáros Balázs Árpád

Partner

Registered auditor

Registration number: 005589

PricewaterhouseCoopers Könyvvizsgáló Kft.

1055 Budapest, Bajcsy-Zsilinszky út 78.

Registration number: 001464

Translation note:

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INDEPENDENT
AUDIT REPORT

**CONSOLIDATED
FINANCIAL
STATEMENTS**

NOTES

WABERER'S INTERNATIONAL NYRT.			
CONSOLIDATED STATEMENT OF FINANCIAL POSITION		data in EUR thousand	
Item name	Note	31/12/2024	31/12/2023
NON-CURRENT ASSETS			
Properties	7	72 574	73 888
Vehicles	7	167 489	167 741
Other equipment	7	6 937	3 804
Total property, plant and equipment		247 000	245 433
Intangible assets	6	15 689	12 600
Goodwill	6	18 293	17 900
Non-current financial assets measured through other comprehensive income - Debt instruments	10	446 089	109 510
Non-current financial assets measured at amortised historical cost - Debt instruments	10	3 540	8 018
Non-current financial assets measured at fair value through profit or loss	10	4 712	-
Other non-current financial assets	9	1 574	444
Investments in associates and joint ventures	8	17 227	8
Deferred tax asset	33	4 490	2 934
TOTAL NON-CURRENT ASSETS		758 614	396 847
CURRENT ASSETS			
Inventories	11	3 977	4 781
Current income taxes	33	1 013	664
Receivables from goods and services delivered (trade receivables)	12	99 477	107 079
Other current assets	13	45 790	42 260
Current financial assets measured through other comprehensive income - Debt instruments	10	32 921	29 113
Current financial assets measured at amortised historical cost - Debt instruments	10	400	13 357
Current financial assets measured at fair value through profit or loss	10	74 600	-
Derivative financial instruments	13	275	3 768
Cash and cash equivalents	15	54 667	67 068
Assets held for sale	14	1 299	811
TOTAL CURRENT ASSETS		314 419	268 901
INSURANCE TECHNICAL ASSETS			
Assets from held reinsurance contracts	19	51 869	37 814
TOTAL INSURANCE TECHNICAL ASSETS		51 869	37 814
TOTAL ASSETS		1 124 902	703 562
EQUITY			
Issued capital	16	6 008	6 118
Capital reserve	16	24 928	23 712
Retained earnings	16	134 701	124 148
Other reserves	16	2 285	5 239
Translation difference	16	(15 957)	(8 209)
Equity attributable to the parent company		151 965	151 008
Non-controlling interests		27 507	263
TOTAL EQUITY		179 472	151 271
LIABILITIES			
LONG-TERM LIABILITIES			
Long-term loans and borrowings	20	779	-
Long-term liabilities from bond issuance	36	113 856	113 830
Portion of lease liabilities due in more than 1 year	17	139 336	141 379
Deferred tax liability	32	4 041	1 914
Provisions	18	11 705	18 769
Other long-term liabilities		1 446	-
TOTAL LONG-TERM LIABILITIES		271 163	275 892
SHORT-TERM LIABILITIES			
Short-term loans and borrowings	20	2 710	1 511
Portion of lease liabilities due within 1 year	17	47 938	45 873
Liabilities from goods and services delivered (trade payables)	34	93 762	96 093
Current income taxes	32	909	3 596
Contractual obligations	39	-	240
Other short-term liabilities	21	49 291	43 950
Derivative financial instruments	13	1 189	-
TOTAL CURRENT LIABILITIES		195 799	191 263
Liabilities from insurance contracts	19	478 468	85 136
TOTAL INSURANCE TECHNICAL LIABILITIES		478 468	85 136
TOTAL LIABILITIES		945 430	552 291
TOTAL LIABILITIES and EQUITY		1 124 902	703 562

Budapest, 31 March 2025

WABERER'S INTERNATIONAL NYRT.			
CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME			
	Note	2024	2023
Net sales revenue	22	757 467	710 909
of which: Insurance revenue	22	80 174	71 924
Direct costs	23-27	-669 979	-625 976
of which: Depreciation and amortisation		-54 790	-52 807
of which: Insurance service expenses	23	-62 278	-54 832
of which: Reinsurance contracts profit/loss	27	-3 281	-6 680
Gross margin		87 488	84 933
of which, gross margin without depreciation		142 574	137 740
Indirect costs	29	-75 375	-67 131
Other income	30	34 793	21 952
Interest income calculated using the effective interest method	31	6 415	7 926
Other expenses	31	-11 668	-8 595
Change in embedded derivatives profit/loss (+/-) *	40	295	3 294
Net impairment loss on financial assets		-56	412
Operating profit/loss		41 892	42 791
Income from financial operations	32	8 434	18 876
Expenses of financial operations	32	-25 409	-22 903
Profit or loss from financial operations	32	-16 975	-4 027
of which: Unrealised exchange differences on financial profit/loss		-3 708	6 541
Share of profit/loss from associates and joint ventures	8	2 406	-1
Profit/loss before tax		27 323	38 763
Income tax expenses	33	-5 617	-9 076
Profit (+) / Loss (-) for the current year		21 706	29 687
Of which:			
Profit/loss attributable to parent company shareholders		21 562	29 471
Profit attributable to non-controlling/minority interests		144	216
Other comprehensive income:			
<i>To be reclassified to profit/loss subsequently</i>			
Fair value difference of debt instruments and reserves - net of deferred tax		-62	8 238
Cash flow hedge gain / (loss)	13	-94	11 899
Effective portion of cash flow hedge reclassified to profit or loss	13	-2 754	-8 594
Cash flow hedge cost of hedging	13	-399	-1 338
Exchange differences from foreign currency translation after foreign interests		-7 748	4 412
Other comprehensive income:		-11 057	14 617
Total comprehensive income		10 649	44 304
Of which:			
Profit/loss attributable to parent company shareholders		10 505	44 088
Profit attributable to non-controlling/minority interests		144	216
Earnings per share basic and diluted (EUR/share)	4	1,25	1,69
Explanatory notes:		2024	2023
EBITDA		102 006	95 598
EBIT		45 002	42 791

WABERER'S INTERNATIONAL NYRT.			
CONSOLIDATED CASH FLOW STATEMENT		data in EUR thousand	
Item name	Note	2024	2023
Profit/loss before tax		27 323	38 764
Unrealised foreign exchange loss/gain (-) on other foreign currency assets and liabilities	31	3 708	- 6 542
Depreciation and amortisation accounted	6, 7	48 482	47 406
Impairment of non-financial assets - or reversal		-	-
Impairment of financial assets - or reversal		57	- 412
Interest expenses	31	13 098	11 827
Interest income	31	- 2 807	- 3 574
Difference in provision generation and utilisation	18	- 7 710	- 6 528
Change in technical provisions		4 817	- 22 851
Profit/loss from the sale of property, plant and equipment		- 6 768	- 3 364
Profit/loss from the sale of assets held for sale		-	-
Net cash flow from business activities before change in working capital		80 200	54 725
Change in inventory levels	11	377	- 207
Change in trade receivables		9 089	1 939
Change in other current assets and derivative financial instruments		25 272	- 12 379
Change in suppliers		- 1 432	- 1 883
Change in other short-term liabilities and derivative financial instruments		- 4 119	22 298
Change in technical liabilities		224	40 536
Income tax paid	33	- 10 411	- 5 098
I. Net cash flow from operating activities		99 199	99 932
Acquisition of property, plant and equipment	6, 7	- 18 364	- 38 403
Cash inflow from the sale of property, plant and equipment	7	172	1 052
Revenue from the sale of non-current assets		17 970	9 347
Increase in other non-current financial assets		- 3 263	- 437
Decrease in other non-current financial assets		2 134	-
Net cash used in acquisition of subsidiaries		- 54 711	-
Cash and cash equivalents used for the acquisition of associates and joint ventures		- 17 219	- 7
Acquisition of insurer's debt and equity instruments		- 74 156	- 250 158
Sale of insurer's debt and equity instruments		108 396	214 955
Interest received	31	2 870	3 296
II. Net cash flow from investment activities		- 36 171	- 60 356
Loan repayment	35	907	- 1 834
Bond issuance	35	-	-
Loan repayment	35	-	-
Lease repayment	35	- 42 402	- 38 459
Lease repayment for sale during buyout	35	- 12 332	- 5 795
Interest paid	35	- 13 072	- 11 811
Repurchased own shares		- 3 140	-
Dividend paid		- 5 389	- 4 733
III. Net cash flow from financing operations		- 75 429	- 62 632
IV. Change in cash and cash equivalents		- 12 401	- 23 056
Cash and cash equivalents at the beginning of the year	15	67 068	90 124
Exchange rate effect			
Cash and cash equivalents at the end of the year	15	54 667	67 068
Budapest, 31 March 2025			

WABERER'S INTERNATIONAL NYRT.													
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY											data in EUR thousand		
	Note	Issued capital	Capital reserve	Retained earnings	Hedge reserves	Valuation reserves	Total other reserves (Hedge and Valuation)	Translation difference	Equity attributable to the parent company	Non-controlling interests	Total equity		
Opening value 1 January 2023		6 118	23 712	100 604	1 415	-6 361	-4 946	-12 620	112 868	233	113 101		
Fair value differences of cash flow hedging instruments less deferred tax		0	0	0	1 967	0	1 967	0	1 967	0	1 967		
Fair value difference of non-current financial assets		0	0	0	0	8 238	8 238	0	8 238	0	8 238		
Exchange differences from foreign interests		0	0	0	0	0	0	4 412	4 412	0	4 412		
Other comprehensive income		0	0	0	1 967	8 238	10 205	4 412	14 617	0	14 617		
Current year result		0	0	29 471	0	0	0	0	29 471	216	29 687		
Total comprehensive income		0	0	29 471	1 967	8 238	10 205	4 412	44 088	216	44 304		
Transfer of capital reserve		0	0	0	0	0	0	0	0	0	0		
Minority dividend		0	0	0	0	0	0	0	0	-186	-186		
Dividend payment to shareholders		0	0	-4 762	0	0	0	0	-4 762	0	-4 762		
Other movements		0	0	-1 165	9	-29	-20	-1	-1 186	0	-1 186		
Closing value 31 December 2023		6 118	23 712	124 148	3 391	1 848	5 239	-	8 209	151 008	263	151 271	
Fair value differences of cash flow hedging instruments less deferred tax		0	0	0	-3 247	0	-3 247	0	-3 247	0	-3 247		
Fair value difference of non-current financial assets		0	0	0	0	-62	-62	0	-62	0	-62		
Exchange differences from foreign interests		0	0	0	0	0	0	-7 748	-7 748	0	-7 748		
Other comprehensive income		0	0	0	-3 247	-62	-3 309	-7 748	-11 057	0	-11 057		
Current year result		0	0	21 562	0	0	0	0	21 562	144	21 706		
Total comprehensive income		0	0	21 562	-3 247	-62	-3 309	-7 748	10 505	144	10 649		
Transfer of capital reserve		0	1 216	-1 216	0	0	0	0	0	0	0		
Minority dividend		0	0	0	0	0	0	0	0	-168	-168		
Dividend payment to shareholders	16	0	0	-5 388	0	0	0	0	-5 388	0	-5 388		
Repurchase of own shares for ESOP programme	21	-110	0	-3 029	0	0	0	0	-3 139	0	-3 139		
Other movements		0	0	-1 376	-991	1 346	355	0	-1 021	-13	-1 034		
Acquisition of subsidiaries	8	0	0	0	0	0	0	0	0	27 281	27 281		
Closing value 31 December 2024		6 008	24 928	134 701	-	847	3 132	2 285	-	15 957	151 965	27 507	179 472

Budapest, 31 March 2025

INDEPENDENT
AUDIT REPORT

CONSOLIDATED
FINANCIAL
STATEMENTS

I NOTES

1. THE REPORTING ENTITY

Waberer's International Nyrt. (hereinafter: "Company") is a company based in Hungary. The address of the registered office of the Company is: H-1239 Budapest, Nagykörösi út 351. The consolidated financial statements prepared as at

31 December 2024, for the financial year ending on this date, include the financial information of the Company and its subsidiaries, collectively the Group (hereinafter collectively: "Group", individually: "entities belonging to the Group"). Ultimate

control over the Group is exercised by an individual person, István Tiborcz. The core activity of the Group is transportation, freight forwarding, logistics services and insurance.

2. BASIS OF PREPARATION OF THE FINANCIAL STATEMENTS

(A) DISCLOSURE RELATED TO GOING CONCERN

Following the losses suffered in 2019 and 2020, the Group returned to sustained profitability thanks to the changes implemented in 2020 and stabilised in 2021, as well as the successful new business model. The high EBITDA level of 2023 was exceeded in 2024, surpassing the previously planned expectations set out in the strategic plan.

One of the drivers of the improvement in the Group's results over the past three and a half years has been the significant development in the results of the regional contract logistics segment. In 2024, the Polish subsidiary fell short of target due to unfavourable market conditions, but the high performance of other Group members was able to compensate for this. This supports the belief that the strengthening of the regional and insurance segments can make the Group more resilient to potential crisis impacts.

The international transport segment expanded in 2024 with the acquisition of the interest in Petrolsped Group, which also contributed to the segment's growth with its profit attributable to the Group. The regional logistics segment performed well, as in previous years, to which the acquisition of the interest in the Serbian MD International d.o.o., in the current year also contributed. The insurance segment also had a successful year, thanks to outstanding interest rates and portfolio expansion.

In April 2022, the Group completed a bond issuance with a nominal value of EUR 111 million. The bond is fixed-rate, with a 10-year maturity, repayable at 10% annually between the 5th and 9th years, and 50% in the 10th year. The Group used the proceeds from the bond issuance - in line with its strategy presented in December 2021 - for the construction of its own warehouse, regional acquisitions and fleet replacement financing, as well as refinancing existing loans. The first company-built warehouse in Ecser was delivered in 2024, which the operation has already started using, and the construction of the Debrecen warehouse has also commenced, expected to commence operations in 2025. The acquisitions in part supported the expansion of activities (Petrolsped - rail), and in part the targeted direction of regional expansion (MDI - Serbia). At the end of the year, the acquisition of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. further strengthened the insurance segment and expanded its service portfolio. With the new group members, there is an opportunity to provide further synergies and complex services, which the Company will focus on in 2025. The Group is expected to support the achievement of these goals with further acquisitions in 2025. The above also shows that the funds raised were used in line with the previously announced goals and invested successfully.

The working capital financing sources, operating under a strict system of conditions and collateral, which reflected the Group's previous financial situation, were replaced by a long-term, unsecured source (the bond issue), which provides a stable foundation for the Group's short and long-term financing, allowing the Group to implement its strategic development projects with reassuring liquidity reserves.

As a result of its successful business operation and the additional resources provided by bonds, the Group has consistently showed stable liquidity and its cash balances were EUR 55 million as at 31 December 2024.

In assessing the going concern principle, management considered several factors - including the Group's performance and the availability of adequate financing - as follows:

- The Group's operations were successful in the second half of 2020 and throughout the full business years of 2021, 2022, 2023 and 2024, despite various adverse economic impacts affecting Europe, and - as a result of the future effects of management's action plan - are expected to be successful in the coming years as well. This sustained period of success adequately demonstrates the lasting positive impact and crisis resilience of the business model. However, the unfavourable and rapidly changing po-

litical and economic environment may affect further growth opportunities.

- Thanks to the successful years, the relationship with credit institutions is good, and the necessary leasing agreements are in place. The Company's new ownership structure also provides an environment that supports the Company's development and financial stability.
- In November 2023, the Company published the "Waberer's Group – Strate-

gy 2027" medium-term business plan, in which the actions outlined project an attractive growth path as a result of the successful core activity and actions laying the foundation for expansion and sustainable competitiveness, alongside a conservative level of indebtedness. In line with this, the previously set goals have been achieved.

The management and the Board of Directors of Waberer's International Nyrt.

believe that the Group has adequate resources to continue operations in the foreseeable future, and accordingly, the financial statements have been prepared in accordance with the going concern principle.

The consolidated financial statements do not include adjustments to the reported amounts and classifications that would be necessary if the going concern principle were not applicable to the Group's continued operations.

(B) STATEMENT OF COMPLIANCE WITH INTERNATIONAL FINANCIAL REPORTING STANDARDS

The Group's consolidated financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) as adopted by the EU, assuming the going concern principle.

The IFRS consists of accounting standards issued by the IASB and its predecessor, as well as interpretations issued

by the International Financial Reporting Interpretations Committee (IFRIC) and its predecessor.

These consolidated financial statements were approved by the Board of Directors on 31/03/2025 and submitted to the General Meeting for approval. The General Meeting is entitled to approve

the consolidated financial statements and may request amendments before approval. Based on past experience, the likelihood of the General Meeting requesting amendments is extremely low. There has been no precedent for this in the past.

(C) BASIS OF MEASUREMENT

Except for derivative financial instruments and non-current financial assets measured at fair value through other compre-

hensive income - Debt instruments, which are measured at fair value, the basis of measurement in the preparation of the

consolidated primary financial statements is historical cost.

(D) FUNCTIONAL AND PRESENTATION CURRENCY

More than 90% of the Group's transactions are conducted within the European Union. The Group's financing is in EUR, and in terms of interest margins, financiers take into account the Hungarian country risk

premium to a minimal extent due to the Group's specific EU activities. Accordingly, the consolidated financial statements have been prepared in EUR, which has been the Group's presentation currency

since 01/01/2013.

The functional currencies of certain entities belonging to the Group, where the currency is not the euro, are summarised in the table below:

COMPANY	2024	2023
WSZL Kft.	HUF	HUF
Gránit Biztosító Zrt.	HUF	HUF
Közdülő Invest Kft.	HUF	HUF
Magyar Posta Biztosító Zrt.,	HUF	

Magyar Posta Életbiztosító Zrt.	HUF	
KDI Property Kft.	HUF	HUF
WPL-Log Zrt.	HUF	HUF
WPL Ingatlanfejlesztő Kft.	HUF	HUF
WABERER'S Rail Kft.*	HUF	HUF
Waberer's Romania SA	RON	RON
LINK Sp. z o.o.	PLN	PLN
NewDefine Sp. zoo	PLN	PLN

*In 2024, the name of SinoWa International Kft. was changed to WABERER'S Rail Kft.

(E) USE OF ESTIMATES AND JUDGMENT

The preparation of financial statements in conformity with the following accounting policies requires management to make judgments, estimates, and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income, and expenses. Actual results may differ from these estimates.

The estimates and underlying as-

sumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimates are revised and in any future periods affected.

The following notes present the main areas of estimation uncertainty and critical decisions in the application of accounting policies that have the most significant impact on the amounts presented

in the consolidated financial statements:

- assessment of the recoverable amount of cash-generating units containing goodwill (Section 6 (a))
- provisions and contingent items (Sections 18 and 38)
- claims and liabilities arising from insurance and reinsurance contracts (Section 19)

3. SIGNIFICANT ACCOUNTING POLICIES

The application of the accounting policies described below has been consistent for

all periods presented in these consolidated financial statements, and the entities

belonging to the Group have consistently applied these.

STANDARDS AND INTERPRETATIONS ISSUED BUT NOT YET EFFECTIVE BUT ADOPTED BY THE EU

IAS 21 THE EFFECTS OF CHANGES IN FOREIGN EXCHANGE RATES

The amendment issued on 15 August 2023, applicable for the period after 1 January 2025, specifies when a currency can be converted into another currency and consequently when it cannot, how an entity determines the exchange rate to

apply when a currency is not convertible, and what information an entity must disclose if the currency is not convertible.

The Group believes that the adoption of the above amendments will have no impact on the Group's consolidated financial statements.

STANDARDS AND INTERPRETATIONS ISSUED BUT NOT YET EFFECTIVE AND NOT YET ADOPTED BY THE EU

IFRS 18 PRESENTATION AND DISCLOSURE IN FINANCIAL STATEMENTS

The IASB issued IFRS 18 in April 2024, which is mandatorily applicable for annual periods beginning on or after 1 January 2027, with earlier application permitted. It will replace the IAS 1 standard on the presentation of financial statements, and the changes will mainly affect the statement of profit and loss. It introduces a five-category breakdown in the statement of profit and loss – the operating, investing, and financing subtotals, as well as income tax and discontinued operations. Companies must determine their core activity, which will influence where certain transactions should be presented in the statement of profit and loss. The standard introduces the concept of management-defined performance measures and prescribes their disclosure requirements.

IFRS 19 SUBSIDIARIES WITHOUT PUBLIC ACCOUNTABILITY: DISCLOSURES

The IASB issued IFRS 19 in May 2024, and eligible subsidiaries may choose to

apply it for annual periods beginning on or after 1 January 2027, with earlier application permitted. Its aim is to simplify disclosures affecting IFRS reports and reduce the related administrative burdens.

IFRS 9 AND IFRS 7 FINANCIAL INSTRUMENTS AND DISCLOSURES: CONTRACTS REFERENCING NATURE-DEPENDENT ELECTRICITY (AMENDMENTS)

The amendments apply to annual periods beginning on or after 1 January 2026, with earlier application permitted. The December 2024 amendment affected the IFRS 9 standard's requirements for own use and hedge accounting. For contracts for the purchase and receipt of renewable energy, amendments are made to ensure the appropriate handling of variable volume transactions. In line with the IFRS 9 amendment, disclosures under the IFRS 7 standard have also been clarified.

IFRS 9 AND IFRS 7 FINANCIAL INSTRUMENTS AND DISCLOSURES: CLASSIFICATION AND MEASUREMENT OF FINANCIAL INSTRUMENTS

(AMENDMENTS)

On 30 May 2024, the IASB issued amendments affecting the derecognition of financial liabilities settled by electronic transfer, as well as the classification and disclosures of various other financial instruments. In the case of electronic transfers, if the standard's criteria are met, it is possible to consider the financial liabilities settled by them as fulfilled earlier and derecognise them.

Regarding the classification of financial instruments, the amendment clarifies the characteristics of non-recourse instruments and contractual instruments. The amendments to disclosures impose additional requirements for investments in equity instruments measured at fair value through other comprehensive income and for certain contractual terms.

The amendments apply to annual periods beginning on or after 1 January 2026. Earlier application is permitted, either with the simultaneous application of all amendments or only with the modification of the classification of financial instruments. Entities must apply the amendments retroactively.

EXCEPT FOR THE AMENDED IFRS STANDARDS ADOPTED BY THE GROUP IN 2024, AS DESCRIBED BELOW, THE ACCOUNTING POLICIES APPLIED IN THE PREPARATION OF THE CONSOLIDATED FINANCIAL STATEMENTS ARE CONSISTENT WITH THOSE APPLIED IN THE PREVIOUS YEAR:

IAS 1 PRESENTATION OF FINANCIAL STATEMENTS: CLASSIFICATION OF LIABILITIES AS CURRENT OR NON-CURRENT (AMENDMENT)

The amendments apply to annual periods beginning on or after 1 January 2024. The amendments clarify that liabilities should be classified as current or non-current based on the rights existing at the reporting date. A liability is non-current if the entity has a substantive right (the right does not need to be unconditional) at the reporting date to defer settlement for at

least 12 months.

The October 2022 amendment states that covenants that must be met after the reporting date should not be considered when determining whether a liability is non-current or current on the reporting date. Furthermore, management's expectations regarding future payments do not affect the classification of liabilities. A liability should be classified as current if the covenant was breached on or before the reporting date, even if the lender waives the covenant breach after the reporting date. Conversely, a loan should be classi-

fied as non-current if the covenant breach occurs only after the reporting date.

The Group has applied the amendments from 1 January 2024, which had no significant impact on the Group's consolidated financial statements.

IFRS 16 LEASES: LEASE LIABILITY AND SALE AND LEASEBACK (AMENDMENTS)

On 22 September 2022, the IASB issued Lease Liability in a Sale and Leaseback (Amendments to IFRS 16) with amendments that clarify how a seller-lessee sub-

sequently measures sale and leaseback transactions that satisfy the requirements in IFRS 15 to be accounted for as a sale. The seller-lessee cannot recognise any gain or loss relating to the right-of-use asset retained, and the lease liability must be measured even if it is not a variable payment dependent on an index or rate.

The Group has applied the amend-

ments from 1 January 2024, which had no significant impact on the Group's consolidated financial statements.

IAS 7 STATEMENT OF CASH FLOWS AND IFRS 7 FINANCIAL INSTRUMENTS: DISCLOSURES

The amendment issued on 25 May 2023

targets disclosure requirements related to supplier financing arrangements, aiming to enhance transparency and demonstrate the impact on an entity's liabilities, cash flows, and exposure to liquidity risk.

The Group has applied the amendments from 1 January 2024, which had no significant impact on the Group's consolidated financial statements.

(A) BASIS OF CONSOLIDATION

SUBSIDIARIES

Subsidiaries are entities controlled by the Group. Control exists when the Group has the power to direct the financial and operating policies of an entity to obtain benefits from its activities. The assessment of control takes into account potential voting rights that may currently be exercised. The consolidated financial statements include the financial statements of subsidiaries from the date that control com-

mences until the date that control ceases. The accounting policies of subsidiaries have been changed where necessary to align them with the policies adopted by the Group.

TRANSACTIONS ELIMINATED ON CONSOLIDATION

In the course of consolidation, intra-group receivables and liabilities, as well as realised and unrealised income and expenses

arising from intra-group transactions, are eliminated.

ASSOCIATES AND JOINT VENTURES

The Group has investments in three companies where it has no control, only significant influence or joint control, and therefore includes them in the consolidation using the equity method. The share in the associate's loss was only up to the extent of the investment.

(B) FOREIGN CURRENCY

TRANSACTIONS IN FOREIGN CURRENCY

Transactions in foreign currencies are translated into the respective functional currencies of the Group entities at the central bank exchange rate prevailing at the date of the transaction. As at the balance sheet date, monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the exchange rate at the balance sheet date. Exchange gains or losses on mon-

etary items are the difference between the amortised historical cost in the functional currency at the beginning of the period adjusted for effective interest and payments during the period, and the amortised historical cost in foreign currency translated at the exchange rate at the end of the period. Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are translated into the functional currency at the exchange rate at the date the fair val-

ue was determined.

FOREIGN OPERATIONS

The assets and liabilities of foreign operations, including goodwill and fair value adjustments arising on acquisition, are translated into euros at the exchange rate at the balance sheet date. The income and expenses of foreign operations are translated into euros at the average exchange rate for the year.

(C) FINANCIAL INSTRUMENTS

The Group's financial assets typically include trade receivables other than cash, corporate bonds issued at amortised historical cost, government securities and other securities measured at fair value through other comprehensive income, and

other receivables and derivative transactions, which are detailed in the following sections. The Group holds securities under two business models, typically for the purpose of collecting cash flows, while some securities are held for dual purpos-

es, collecting cash flows and for sale. Accordingly, a significant portion of financial assets is measured at amortised historical cost, while some securities are measured at fair value through other comprehensive income.

SPPI TEST

Purchased securities, corporate bonds have fixed terms, fixed interest rates, and fixed repayment schedules. They do not contain any other risk, volatility-reflecting, event-dependent cash flows. The interest covers only the time value of money, credit and liquidity risk, costs associated with the loan, and the lender's profit.

The Group's financial liabilities typically include leases, other loans and borrowings, issued bonds, and other liabilities and derivative transactions, which are detailed in the following sections. Except for derivative transactions, financial liabilities are measured at amortised historical cost by the Group.

An equity instrument is any item that entitles a residual interest in the assets of

an entity after deducting all of its liabilities.

DERIVATIVE FINANCIAL INSTRUMENTS

The Group holds derivative financial instruments to hedge its exposure to currency risks. Derivative transactions are initially accounted for at fair value, with attributable transaction costs accounted for in gain/loss at the time they are incurred. Subsequent to initial recognition, derivative transactions qualifying as cash flow hedges are measured at fair value at year-end, with the effective portion directly recognised in other comprehensive income, while the ineffective portion is recognised against other expenses or other income. For cash flow hedges that were closed during the period, the Group's

accounting policy is that the effective portion of the realised gain or loss is recognised as a decrease or increase in revenue for revenue hedges, and for hedges of wage and fuel costs, it is recognised among direct costs. From 2023, the Group has also entered into KO forward transactions to hedge its currency risk, which consist of 2 options. A knock-out forward (KO Forward) is a complex option product of a forward transaction nature, which includes a price level (knock-out/KO level) that, if affected by interbank market quotes at the option's expiry, causes the transaction itself to terminate. For options, the Group designates the intrinsic value of the option as the hedging instrument, while the time value of the option is recognised as the cost of hedging in the statement of other comprehensive income.

(D) PROPERTY, VEHICLES, EQUIPMENT**RECOGNITION AND MEASUREMENT**

Property, vehicles, equipment are measured at cost less accumulated depreciation and accumulated impairment losses. If individual parts of a property, vehicle or equipment have different useful lives, these are recognised as separate items (main items) among property, vehicle and equipment items. The gain or loss on the disposal of an item of property, vehicle and equipment is determined by comparing the proceeds from disposal with the carrying amount of property, vehicle and equipment, and is recognised net in profit or loss among other income or other expenses.

SUBSEQUENT COSTS

The replacement cost of a part of property, plant, and equipment is recognised in the carrying amount of the item if it is probable that the future economic benefits embodied in that part will flow to the Group, and the historical cost of the given part can be measured reliably. The carrying amount of the replaced part is derecognised. The costs of the day-to-day servicing of property, plant and equipment are recognised in profit or loss as incurred.

DEPRECIATION

Depreciation is recognised in profit or loss on a straight-line basis over the estimated useful lives of each part of property, plant and equipment, to the depreciable amount of the asset. The depreciable amount is the historical cost, less its residual value. No depreciation is charged on land.

The estimated useful lives for the current and comparative periods are as follows:

- buildings **30-50 years**
- plant and equipment **7 years**
- vehicles **4-5 years**
- other equipment and fixtures **7 years**

IFRS16 RIGHT-OF-USE ASSET

The Group has vehicle and property lease agreements, and the right-of-use assets are presented under property and vehicles. The useful life and residual value of vehicles purchased through lease financing are consistent with the lease term specified in the lease agreement and the buyback guarantee value provided by the vehicle manufacturer at the end of the term for the regional contractual logistics segment. For the international transport segment, the right-of-use of assets is recognised based on cash outflows during the term as asset value, which is depreci-

ated on a straight-line basis over the contract term according to IFRS 16 rules. Depreciation of right-of-use assets is carried out over the lease term as determined by the Group in accordance with IFRS 16. Any right-of-use arising from a lease with a term not exceeding 12 months or where the underlying asset's value does not individually exceed EUR 5,000 is not recognised as an asset but is instead accounted for under direct expenses through lease payments in the profit and loss statement.

(E) INTANGIBLE ASSETS

GOODWILL

The historical cost of goodwill: the Group determines the amount of goodwill for its executed business combinations as the difference between the consideration paid and the fair value of the net assets acquired.

OTHER INTANGIBLE ASSETS

Other intangible assets acquired by the Group with a specific useful life (software,

licences) are recorded at historical cost less accumulated amortisation and accumulated impairment losses.

SUBSEQUENT EXPENDITURE

Subsequent expenditure is capitalised only when it increases the future economic benefits embodied in the specific asset. All other expenditure, including expenditure on brands, is recognised in profit or loss as incurred.

AMORTISATION

Amortisation is accounted for in profit or loss on a straight-line basis over the estimated useful life of the intangible assets, except for goodwill, from the date they are available for use. The estimated useful lives for the current and comparative periods are as follows:

- software **10 years**
- property rights **6 years**

(F) INVENTORIES

Inventories are measured at the lower of historical cost and net realisable value at the reporting date. The historical cost of spare parts inventories includes the costs incurred in acquiring the inventories, pro-

duction or conversion costs, and other costs incurred in bringing the inventories to their present location and condition, with disposal at average cost, and for tank inventories, according to the FIFO

principle. Net realisable value is the estimated selling price in the ordinary course of business, less the estimated costs of completion and the estimated costs necessary to make the sale.

(G) IMPAIRMENT

FINANCIAL INSTRUMENTS

The Group assesses expected credit losses on debt instruments measured at amortised historical cost or at fair value through other comprehensive income (FVOCI) on a forward-looking basis, and the impairment loss is recognised monthly.

The simplified approach does not require tracking of credit risk, but instead, lifetime expected credit losses are recognised continuously. For trade and contractual receivables that do not contain a significant financing element, where the Group has decided not to adjust the interest component for revenue recognition purposes – because it does not contain a significant financing component – the Group has opted to apply the simplified approach. Impairment of other financial instruments is accounted for using the general approach.

Under the simplified approach, the

Group uses an impairment matrix to determine expected credit losses over the entire lifetime, taking into account the specific circumstances of the customers and the number of days past due. The impairment rates applied in the matrix are determined based on the general requirements of IFRS 9 for expected credit loss calculations. If in a subsequent period the amount of impairment decreases, and the decrease can be objectively linked to an event occurring after the impairment was accounted for (such as an improvement in the debtor's credit rating), the previously accounted for impairment is reversed through an adjustment to the impairment account against annual profit. As a result of the reversal of impairment, the carrying amount of the financial asset cannot exceed the amortised historical cost that would have been applicable if the impairment had not been accounted for at the time of reversal.

The Group writes off financial assets, in whole or in part, when it has exhausted all practical recovery efforts, and the recovery of the asset is not realistic.

This may be indicated by:

- the cessation of collection activities, and
- if the collection method involves the seizure of collateral, and the collateral value is insufficient to fully recover the outstanding amount.

Any subsequent recovery of amounts previously written off is recognised against the current year's profit by reducing the impairment account.

NON-FINANCIAL ASSETS

The carrying amount of non-financial assets within the scope of IAS 36 is reviewed at each reporting date by the Group to determine whether there is any indication of impairment. If there is an indication of

impairment, the estimated recoverable amount of the asset is determined. The recoverable amount of goodwill and intangible assets with indefinite useful lives or not yet available for use is estimated at least at each balance sheet date. The

Group examines annually, or whenever there is an indication that an impairment may be necessary, whether goodwill needs to be impaired. Accordingly, the recoverable amount of the cash-generating units to which goodwill is allocated

must be estimated. To determine the recoverable amount, the Group estimates the future expected cash flows of the cash-generating unit and selects the appropriate discount rate to calculate the present value of the cash flows.

(H) NON-CURRENT ASSETS HELD FOR SALE

Non-current assets (or disposal groups comprising assets and liabilities) that are expected to be recovered primarily through sale rather than through con-

tinuing use are classified as non-current assets held for sale. The Group typically classifies assets repossessed from leases but intended for sale in this category.

ry, where the expected sale is within 12 months.

(I) EMPLOYEE BENEFITS

TERMINATION BENEFITS

Termination benefits are recognised as an expense when the Group is demonstrably committed, without realistic possibility of withdrawal, to a formal detailed plan to either terminate employment before the normal retirement date or to provide termination benefits as a result of an offer made to encourage voluntary redundancy.

cy. Termination benefits for voluntary redundancy are recognised as an expense if the Group has made an offer of voluntary redundancy that is likely to be accepted and the number of acceptances can be reliably estimated.

SHORT-TERM EMPLOYEE BENEFITS

The obligations for short-term employee

benefits are measured on an undiscounted basis and are expensed as the related service is provided.

A liability is recognised for the amounts expected to be paid under short-term bonus or profit-sharing plans if the Group has a present legal or constructive obligation to pay these amounts as a result of past service provided by the employee, and the obligation can be reliably estimated.

(J) SHARE-BASED PAYMENTS

Certain employees of the Group (members of senior and middle management) receive share-based cash-settled benefits under the employee share ownership programme (ESOP). The cost of share-based

payments is determined at the grant date based on the fair value of the award. The fair value is recognised as an expense over the vesting period, with a corresponding increase in liabilities. The liability

is remeasured at each balance sheet date (including the settlement date), and any changes in fair value are recognised in the current year's profit or loss.

(K) PROVISIONS

A provision is recognised if, as a result of a past event, the Group has a present legal or constructive obligation that can be reliably estimated, and it is probable that an outflow of economic benefits will be required to settle the obligation.

(L) REVENUE

IFRS 15 – Revenue from Contracts with Customers

The Group's revenues are generated in three segments: international transport and freight forwarding (ITS), domestic contract logistics (RCL), and the insurance segment.

The Group distinguishes the following types of revenue, which fall under the scope of the IFRS 15 Revenue from Contracts with Customers standard:

- international transport and freight forwarding
- warehouse logistics
- warehouse construction
- in-house logistics

The Group has determined that in accordance with the principles of the IFRS 15 standard:

- the performance obligation is satisfied on an ongoing basis in the case of transport and freight forwarding

services, and the related revenue is recognised over the period based on kilometres travelled, using the output method

- in the case of other related customs brokerage, freight insurance arrangement, cargo securing, and packaging services, the performance obligation is satisfied at a given point in time
- in the case of warehouse logistics, the performance obligation is also satisfied on an ongoing basis
- in the case of warehouse construction activities, the performance obligation is also satisfied on an ongoing basis, and the related revenues are recognised using the input method
- in the case of international transport, compensation paid to the customer is considered consideration paid to the customer, and is therefore recognised as a reduction of revenue

- it essentially acts as a principal in contracts with customers, as it typically controls the goods and services, and in the case of cargo insurance, acts as an agent before handing them over to customers; for services, the Group bears full responsibility resulting in the recognition of revenue on a gross basis as the principal
- there is no significant financing component, as the period between the contract date and the transfer of the promised goods or services to the customer and the payment by the customer is expected to be no more than one year.

Revenues related to the insurance segment include revenues from insurance contracts, and the accounting policy for this is found in Section (o).

(M) FINANCIAL INCOME AND EXPENSES

Financial income includes interest income on investments. Interest income is recognised in profit or loss on a time-proportionate basis using the effective interest

rate method. The components of financial expenses include interest expenses on loans, the unwinding of the discount on provisions, interest on issued bonds, and

lease interest. Realised foreign exchange gains and losses are presented on a gross basis, while unrealised gains and losses are presented on a net basis.

(N) INCOME TAX

The income tax expense includes actual and deferred taxes. Income tax expense is recognised in profit or loss except to the extent that it relates to items recognised directly in equity, in which case it is recognised in equity. The local business tax and innovation contribution levied in Hungary are also presented as income tax.

Deferred tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary difference can be utilised. Deferred tax assets are reviewed at each balance sheet date and are reduced to the extent that it is no longer probable that the related tax benefit will

be realised.

Due to changes in the IAS 12 standard, the global minimum tax is presented as an income tax expense, with the rule that no deferred tax asset or liability can be recognised in connection with the global minimum tax.

(O) IFRS 17 INSURANCE CONTRACTS

An insurance contract is a contract under which one party (the issuer) accepts significant insurance risk from another party

(the policyholder) by agreeing to compensate the policyholder if a specified uncertain future event (the insured event) ad-

versely affects the policyholder.

Contracts that transfer significant insurance risk associated with underlying

insurance contracts to another party are classified as reinsurance contracts.

The Group applies the IFRS 17 standard to:

- insurance contracts it issues, including reinsurance contracts;
- reinsurance contracts it holds;

The Group does not have investment contracts with discretionary participation features.

IDENTIFICATION OF INSURANCE CONTRACTS

At the inception of the contracts, the Group assesses whether its issued contracts qualify as insurance contracts based on the criteria in the standard. Based on a detailed analysis of the contractual terms and live contracts of the products sold as insurance, the Group has concluded that the contracts of its currently live products are insurance contracts.

Insurance risk is the risk transferred to the Group, which is a non-financial risk and embodies uncertainty in at least one of the following factors: whether the insured event will occur, when it will occur, and how much the insurer will pay if it occurs. The risk is significant if and only if, at the inception of the contract, it is expected that there is an economically realistic insured event that would require the Group to make significant additional payments compared to if the insured event had not occurred.

Contracts classified as insurance contracts at inception remain insurance contracts until all rights and obligations under the contract are extinguished or expire.

PORTFOLIOS

The Group classifies its contracts into insurance contract portfolios. The portfolio consists of contracts subject to similar risks and managed together. The Group classifies the insurance contracts of its subsidiaries Gránit Biztosító Zrt., Magyar Posta Biztosító Zrt., and Magyar Posta Életbiztosító Zrt. ('The Insurers') into different portfolios, as they are managed separately by each subsidiary.

The following contract portfolios have been identified:

Gránit Biztosító Zrt. non-life insurance portfolios:

- MTPL

- CASCO
- Other liability: liability insurance products, excluding separately managed MTPL.
- Other property: products other than the above (cargo, travel, property, and health insurance).

Magyar Posta Életbiztosító Zrt. life insurance portfolios:

- Life insurance with participation features – single premium;
- Life insurance with participation features – regular premium;
- Unit-linked life insurance – single premium;
- Unit-linked life insurance – regular premium;
- Other (without participation features) life insurance – traditional, whole life;
- Other life insurance – other products

Magyar Posta Biztosító Zrt. non-life insurance portfolios:

- MTPL;
- Home and property insurance;
- CASCO
- Travel insurance;
- Accident insurance (individual and group insurance);
- Other insurance

The Group does not manage its reinsurance contracts together, thus treating them as separate portfolios.

INITIAL RECOGNITION, COHORTS

The Group does not use the profitability category specified by the standard, where there is no significant chance at initial recognition that they will become onerous later (as it does not have contracts meeting the criteria of this category) and does not have held reinsurance that would be net profitable at initial recognition. The Group annually checks whether the above conditions are indeed met.

The Insurers do not have non-life insurance contract groups measured by the premium allocation approach (PAA) that would be onerous at initial recognition. The Insurers' strategy is not to enter into non-life insurance contracts measured by the PAA that are onerous at initial recognition, meaning that during standard product pricing (measured on an IFRS17 basis), onerous products are not developed or introduced.

The Group determines the initial prof-

itability of life insurance contracts measured by the general measurement model (GMM) and the variable fee approach (VFA) based on an analysis performed with the Insurer's cash flow forecasting system. Based on the analysis, a matrix is compiled, which is used to determine whether the issued contracts are onerous based on the parameters of the issued contracts. The determination of onerousness/profitability is based on the sum of the present value of expected future cash flows and the value of the risk adjustment for the given contract. Thus, the Group determines the profitability classification of contracts based on the data of individual contracts, not applying a contract aggregation level estimate when separating onerous contracts.

The Insurer divides insurance and reinsurance contracts into cohorts. Each cohort is formed according to the calendar year of the initial recognition of the contracts. The Group does not form annual cohorts for its traditional participating life insurance portfolios, as it utilises the exemption provided by the European Union (see Article 2(2)(a) of Commission Delegated Regulation (EU) 2021/2036), which states that for groups of insurance contracts with direct participation features, whose cash flows – in accordance with IFRS 17.B67 and IFRS 17.B68 – affect or are affected by the cash flows due to policyholders of other contracts, annual cohorts are not separated.

BOUNDARIES OF INSURANCE CONTRACTS

When evaluating insurance contracts, all future cash flows within the boundaries of each contract in the group must be considered.

Cash flows are within the boundary of the insurance contract if they arise from the substantive rights and obligations that exist during the reporting period in which the entity can compel the policyholder to pay premiums or in which the entity has a substantive obligation to provide insurance contract services to the policyholder. The substantive obligation to provide insurance contract services ends when:

- the Group is practically able to reassess the risks of the particular policyholder and, as a result, can set a price or level of benefits that fully reflects those risks; or

- both of the following criteria are met:
 - the Group is practically able to reassess the risks of the insurance contract portfolio that contains the contract and, as a result, can set a price or level of benefits that fully reflects the risks of that portfolio; and
 - the premiums charged up to the date of reassessment do not reflect the risks related to periods after the reassessment date.

The boundaries of the Group's non-life insurance contracts extend to the anniversary, as the contracts can be freely repriced or terminated by the Group at the anniversary, thus renewed contracts can be considered new contracts under IFRS17. In the life insurance branch, the boundary of the contracts extends until the termination of the contracts according to the contract terms.

SEPARATION OF INVESTMENT COMPONENTS, CONTRACT COMPONENTS

In identifying insurance contracts, the Group assesses whether the contracts contain one or more components that would fall within the scope of another standard as a separate contract. For example, an insurance contract may contain an investment component, an embedded derivative to be separated, or a component for services other than insurance contract services.

The Group does not issue or hold any separated investment components, embedded derivatives to be separated, or direct or reinsurance contracts containing a promise for goods or services other than insurance contract services.

The investment components of products/contracts sold by the Group's insurers cannot be separated from the underlying insurance contract, as the policyholder cannot maintain the investment contract component independently. Therefore, the investment components of individual insurance contracts are not separated by the Insurers in accordance with IFRS 17. The savings element of life insurance contracts contains a non-separated investment component. The investment component refers to amounts that the Group must pay to the Insured regardless of whether an insured event has occurred. The non-separated investment compo-

nent cannot be included in insurance revenue under IFRS 17, as the standard does not consider these as consideration for services; they simply represent amounts paid back to the policyholder.

Expected investment components include the expected (full and partial) surrender value (considering the probability and value of surrender) and the maturity value payment. For products where there is neither a surrender value nor a maturity value, the Group has not identified an investment component. Actual investment components are separated from actual claims based on the same principles as expected ones.

MEASUREMENT OF DIRECT INSURANCE CONTRACTS

GENERAL MEASUREMENT MODEL (GMM)

The Group must measure insurance contract groups using the general measurement model (GMM), except for those it must measure using the variable fee approach (VFA) and those for which it has selected the premium allocation approach (PAA) valuation.

The Group evaluates its other life insurance contract groups outside of its traditional participating and unit-linked life insurance contract groups, as well as the reserve for claims acquired in the transaction (claims portfolio) in the GMM model.

The Group does not have any contract groups that do not contain direct participation insurance contract groups, but changes in assumptions related to financial risk have a significant impact on the amounts paid to the policyholder, thus the modified GMM model / OCI option defined for handling such contract groups is not relevant for the Group.

At initial recognition, if the net amount of the fulfilment cash flows of the contract group (for information on determining fulfilment cash flows, see the "Estimates and assumptions for fulfilment cash flows" section):

- is profitable, then the Group recognises a contractual service margin (CSM) for the contract group. The contractual service margin corresponds to the profit of the contract group, which must be recognised in the income statement over the coverage period of the contract, in line with

the future services to be provided in connection with the contracts in the group;

- is onerous, then the initial recognition loss is immediately recognised as an insurance service expense, and a loss component (LC) is established in an equal amount.

During subsequent measurement, the carrying amount of insurance contract groups at the end of each reporting period is the sum of the following:

- - liability for remaining coverage (LRC), which consists of:
 - the fulfilment cash flows related to future services for the group, evaluated at the end of the reporting period based on current information;
 - the contractual service margin of the group, evaluated as described in the following paragraphs; and
- liability for incurred claims (LIC), which consists of the fulfilment cash flows related to past services for the group, existing at the end of the reporting period, evaluated based on current information.

(for information on determining fulfilment cash flows, see the "Estimates and assumptions for fulfilment cash flows" section)

Among the movements of the liability for remaining coverage (LRC), the release of the risk adjustment (RA) arising from non-financial risks is accounted for in insurance revenue based on expectations at the beginning of the period, the release of the CSM, the release of expected claims and expenses at the beginning of the period, except for amounts allocated to the loss component, the experience variance related to the premium, if it does not relate to future services, and the portion of premiums related to the recovery of insurance acquisition cash flows allocated to the period. Insurance revenue must not include amounts related to investment components.

Investment components are amounts that the Group must repay to the policyholder under the insurance contract, regardless of whether an insured event occurs. The movement of the actual investment component represents the transfer from the liability for remaining coverage (LRC) to the liability for incurred claims (LIC).

The experience variance, the differ-

ence between the expected and actual premium and insurance acquisition cash flows at the beginning of the period, may relate to past, current, or future insurance services. If it relates to past or current services, the experience variance should be accounted for in insurance revenue if related to the premium; and among insurance service expenses if related to insurance acquisition cash flows. If these experience variances relate to future services, their changes modify the CSM. The Group has not currently identified any experience variance related to premium and insurance acquisition cash flows that would not relate to future services, therefore currently treats everything as related to future services.

The following are accounted for among insurance service expenses: incurred claims (excluding investment components) and other incurred insurance service expenses; amortisation of insurance acquisition cash flows; changes related to past services, i.e., changes in fulfilled cash flows related to the liability for incurred claims; and among changes related to future services, losses incurred on onerous contract groups and reversals of such losses.

The Group accounts for interest accretion (i.e., accretion of future cash flows and CSM), the effect of changes in financial assumptions, and the effect of changes in exchange rate differences between insurance financial income and expenses. The Group applies the OCI option, thereby splitting the above between profit/loss and other comprehensive income. Given that for the Group's insurance contract groups measured with GMM, changes in financial risk assumptions do not have a significant impact on the amounts paid to the policyholder, when applying the OCI option, the Group determines the systematic allocation between profit/loss and other comprehensive income using the discount rates determined at the time of initial recognition of the contract group.

The carrying amount of the contractual service margin at the end of the reporting period equals the carrying amount at the beginning of the reporting period, adjusted by the following:

- CSM of new contracts recognised in the group
- accretion of the carrying amount of the CSM
- changes in estimates of fulfilment

cash flows related to future services, including changes in the estimate of the risk adjustment for non-financial risks, and experience variance related to future services premium and insurance acquisition cash flows, and experience variance of the investment component

- the amount allocated to insurance revenue based on the insurance contract services provided during the period, determined as described below

The Group performs the allocation of the contractual service margin to the current and remaining coverage period at the end of each period, based on which the amount recognised as insurance revenue due to the transfer of insurance contract services in the period is released from the CSM. The basis of allocation is the coverage unit (CU), which indicates the extent of insurance contract services in each period. The Group discounts the planned coverage units using the discount rate applied at initial recognition. The Group does not discount the actual coverage units for the current period.

For contract groups measured with GMM and VFA, the CU is determined based on various variables that best characterise the service provision of the given portfolio, based on the following possible data: number of contracts, amount of mathematical reserves, sum insured, amount of portfolio premium.

If an onerous contract group arises at initial recognition, or if modifications adjusting the CSM (arising from the reasons detailed above) during subsequent measurement render a contract group onerous, the Group recognises and maintains a loss component. The release of the loss component is result-neutral (it appears both in insurance revenue as a reducing item and among insurance service expenses as a reducing item), as the loss component is immediately recognised in the result at the moment the contract becomes onerous. The subsequent, result-neutral release is necessary to ensure that insurance revenue consistent with the premiums received and insurance service expenses related to claims and costs paid are reflected in the result over the coverage period. The end-of-period balance of the loss component must also be adjusted for all items that would adjust the CSM. These adjustments are accounted for against insurance service expenses, as long as the

contract group has a loss component. As a result of the adjustments, in the case of an onerous contract group, it may occur that during subsequent measurement the loss component reduces to zero and a CSM is created.

The release of the risk adjustment for non-financial risks for the period (for detailed information on the measurement of the adjustment, see the "Risk Adjustment for Non-Financial Risks in Non-Life Insurance" section) is equal to the opening risk adjustment for non-financial risks multiplied by the ratio of the sum of the projected discounted coverage units for the period to the sum of the projected discounted coverage units for the entire remaining period (including the current period). The discounting of coverage units is done using the yield curve valid at the beginning of the period.

VARIABLE FEE APPROACH (VFA)

The Group evaluates its traditional participating and unit-linked life insurance contract groups using the VFA model, as these contracts meet the criteria for insurance contracts with direct participation features as defined in the standard.

At initial recognition, the evaluation under the VFA model is the same as under the GMM model.

During subsequent measurement, the evaluation under the VFA model differs from the GMM model as follows:

DIFFERENCE	VFA	GMM
CSM interest accretion	None, because the CSM is remeasured for the effects of changes in financial risks	Present in insurance financial expenses, or split between profit/loss and other comprehensive income if the OCI option is applied
Change due to the time value of money and financial risk	Change affecting the variable fee is accounted for in the CSM	Recognition in insurance financial expenses, or split between profit/loss and other comprehensive income if the OCI option is applied
CSM release coverage unit discounting	With the current discount rate	With the discount rate used for initial recognition
Returns on underlying assets	Taken into account	No impact
Discount rate used for initial recognition	Used only for initial recognition	Used for measuring changes in estimates affecting the CSM during subsequent measurement, and for splitting changes due to the time value of money and financial risk between profit/loss and other comprehensive income if the OCI option is applied
Amount accounted for in other comprehensive income if the OCI option is applied	Gain or loss on returns of underlying assets accounted for in other comprehensive income with opposite sign	Difference between values discounted with the discount rate used for initial recognition and the current yield curve

CSM RELEASE

The CSM to be released is the CSM updated to the last day of the current period, thus modified by the impact of new business, current period CSM-modifying experience variances, non-financial estimate changes, and changes in the fair value of underlying items attributable to the Group.

The determination of coverage units is carried out in the same way as for contract groups measured with GMM.

Based on the risk mitigation option, for contract groups evaluated under the VFA model, it is optional to recognise the effects of changes in the time value of money and financial assumptions not in the CSM, but among insurance financial income and expenses. The Group does not have products for which the application of this option would be relevant, therefore it does not utilise the risk mitigation option, and accounts for all effects of changes in the time value of money and financial assumptions in the CSM.

PREMIUM ALLOCATION APPROACH (PAA)

The Group applies the simplified premium allocation approach for the evaluation of non-life insurance contract groups, as the coverage period of the contracts it issues

is at most one year. For non-life insurance, the Group enters into reinsurance for incurred claims, where the coverage period also does not exceed one year.

When applying the premium allocation approach, the entity may decide to recognise insurance acquisition cash flows as expenses when incurred, provided that the coverage period of the contracts in the group is at most one year at initial recognition. This decision is made on a contract group basis by the Group and then consistently applied to the contract groups. The above condition is met for the Group's non-life insurance contracts. For the non-life insurance contract groups of Gránit Biztosító Zrt., the Group utilises the option to recognise insurance acquisition cash flows as expenses when incurred. For the non-life insurance contract groups of Magyar Posta Biztosító Zrt., the Group does not utilise the recognition of insurance acquisition cash flows as expenses when incurred, but defers them upon incurrence and then releases them proportionally with earned premiums over the periods.

Considering that the coverage period of the Group's non-life insurance contracts is at most one year, adjustment of the liability for remaining coverage with a financing component is not necessary.

The Group assesses that the occurrence of claims and the incurrence of costs

can be considered even over time, therefore it allocates its premium income and insurance acquisition costs, if deferred, to the periods of insurance contract services based on the passage of time.

To determine the revenue for the given period, it is also necessary to determine the estimate for the total premium income at the contract level. Total premium income, means the actual premiums received, not the premium written. With the restriction that premium income is only calculated for the coverage period, thus the part of the premium receivable outstanding at any given time, which is expected to be received later, is considered as received. The difference between this estimate and the actual receipt is also recognised as revenue by the Insurer.

LIABILITIES FOR INCURRED CLAIMS (LIC)

Liabilities for incurred claims (LIC) consist of the following:

- the discounted value of the best estimate of future cash flows of expected claim payments and claims settlement costs using the yield curve current at the reporting date;
- the risk adjustment for non-financial risks; and
- liabilities or assets for claims and claim costs that have been approved

for payment but have not yet been financially settled by the reporting date.

The LIC is determined in the same manner for the GMM, VFA, and PAA models. In evaluating liabilities for incurred claims, the Group must have the best estimate of future cash flows for both direct and reinsurance. The Group calculates the cash flow of incurred claims in accordance with the methodology of the Solvency II claims reserve.

ESTIMATES AND ASSUMPTIONS FOR FULFILMENT CASH FLOWS

Fulfilment cash flows consist of the following:

- estimates of future cash flows;
- an adjustment reflecting the time value of money and financial risks related to future cash flows, if the estimates of future cash flows do not include financial risks; and
- the risk adjustment for non-financial risk.

In estimating future cash flows, the Group objectively considers all reasonable and supportable information available without undue cost or effort about the amount, timing, and uncertainty of those future cash flows. This information includes both internal and external past data about claims and other experiences, supplemented by current expectations about future events.

Estimates of future cash flows reflect the Group's perspective at the reporting date, provided that the estimates for relevant market variables are consistent with observable market prices for those variables.

When estimating cash flows, the Group considers current expectations about future events that may affect those cash flows.

RISK ADJUSTMENT FOR NON-FINANCIAL RISKS IN LIFE INSURANCE

Under IFRS 17, for cash flows at the contract group level within the boundary of insurance contracts, a risk adjustment is required for the uncertainty arising from non-financial risks. The Group increases the estimate of the present value of future cash flows by a risk adjustment to reflect the compensation it expects for bearing the uncertainty arising from non-financial

risks related to the amount and timing of the cash flows.

The Group determines the risk adjustment for non-financial risks related to liabilities for remaining coverage from life insurance contracts using a quantile approach. The present value of cash flows calculated for the last day of the current period from liabilities for remaining coverage assumes a (normal) distribution for changes due to specified risk shocks. This normal distribution reflects the combined effect of relevant non-financial risks over the entire future time horizon of the risks, considered at present value. The mean (expected value) of the normal distribution is 0, and its standard deviation is calculated based on the Solvency II standard formula and the underlying assumptions of the standard formula calibration. The difference between the 75% and 50% quantiles (mean) of the mentioned normal distribution is the value of the risk adjustment for non-financial risks at the end of the period. This value is determined by the Group both at the level of the insurance contract portfolio and at company level.

The Group determines the risk adjustment for non-financial risks related to liabilities for incurred claims from life insurance contracts using a quantile approach. In determining the risk adjustment for non-financial risks related to liabilities for incurred claims, the Group applies the confidence level technique and establishes the risk adjustment at a 75% confidence level.

The Group does not split the risk adjustment for non-financial risks into insurance financial result and insurance service result, and considers all changes in the risk adjustment for non-financial risks as changes in non-financial assumptions.

RISK ADJUSTMENT FOR NON-FINANCIAL RISKS IN NON-LIFE INSURANCE

The Group applies the PAA method to its issued non-life insurance contracts, thus the determination of the risk adjustment for non-financial risks is only necessary for liabilities for incurred claims, similar to the (best) estimates of future cash flows. In determining the risk adjustment for non-financial risks related to liabilities for incurred claims, the Group relies on the Solvency II standard formula and the underlying assumptions of the standard

formula calibration.

MEASUREMENT OF REINSURANCE CONTRACTS

For the purpose of simplifying administration, the Group classifies held reinsurance contracts into separate groups. The Group's held life insurance reinsurances have no significant impact on the Group.

For non-life insurance, the Group enters into reinsurance for claims risk, where the coverage period also does not exceed one year. Thus, the Group applies the PAA method for the evaluation of non-life reinsurance contract groups.

The Group presents income or expenses from held reinsurance contracts separately from expenses or income from issued insurance contracts.

Considering that the covered direct contract groups are not onerous, and the non-performance risk is negligible, the evaluation of the asset for remaining reinsurance coverage (ARC) in reinsurance contract groups evaluated under the PAA model can be aligned with the evaluation of the liability for remaining coverage in direct insurance contract groups evaluated under the PAA model, and the evaluation of the asset for incurred claims (AIC) can also be aligned with the evaluation of liabilities for incurred claims.

For reinsurance contracts evaluated under the PAA model, considering the evenness of the occurrence of assumed and observed claims and costs for direct claims, the Group allocates paid reinsurance premiums over time to the various stages of held reinsurance contracts. For individual contracts, this means that the paid reinsurance premium is evenly distributed over the coverage period among the various stages of held reinsurance contracts, and unlike direct insurance, it remains true for the group of held reinsurance contracts, as a single contract belongs to one group.

For the Group's non-life insurance contracts, the held reinsurance contracts have an investment component. The Group evaluates each reinsurance contract's commissions individually to determine the extent to which they should be presented as part of recoverable claims and to what extent as an item reducing the premium transferred to the reinsurer. Some of the items reducing the premium (i.e., to be shown among non-recoverable

claims) may also be investment components. In some of the currently valid and intended-to-be-extended reinsurance contracts, there are commissions dependent on the loss ratio or reinsurer's result, where the extent of the investment component is significant, meaning that part of the amounts paid/accounted for as claim recovery under the contract must be accounted for as an investment component.

In the case of reinsurance, instead of insurance revenue, we mean reinsurance expense, the reinsurance premium paid under total premium income. The Group derives the correction of the reinsurance premium from the correction of direct insurance. Differences between estimated and actual reinsurance premiums paid are accounted for as adjustments to the total premium income.

RISK ADJUSTMENT FOR NON-FINANCIAL RISKS IN REINSURANCE CONTRACTS

When applying the IFRS17 standard, it is necessary to determine the risk adjustment transferred to the reinsurer through reinsurance contracts.

In the case of Posta Biztosító's reinsurance contracts, similar to the calculation method for gross, non-life insurance incurred claims related to non-financial risks, the net risk adjustment is determined by considering the expected present values of net liabilities (thus also con-

sidering the effect of reinsurance) and the net claims run-off pattern. The reinsurance risk adjustment is determined as the difference between the gross risk adjustment and the net risk adjustment, at the level of insurance sectors for non-annuity non-life insurance, and at the level of homogeneous risk groups for annuity non-life insurance. The allocation of the thus calculated risk adjustments to reinsurance contract groups follows a similar logic as for insurance contracts.

HANDLING OF INSURANCE TAX AND SUPPLEMENTARY INSURANCE TAX

Cash flows within the boundary of the insurance contract are cash flows directly related to the performance of the contract. These include transaction-based taxes, such as insurance tax, which directly arise from existing insurance contracts.

The Group considers insurance tax to be directly related to contract groups and treats it as an item reducing insurance premium income, and presents it as such in IFRS 17 calculations. The Group also considers the supplementary tax in the insurance sector to be an item directly related to contract groups, and its amount is presented among the expenses of insurance services.

DISCOUNTING

IFRS 17 applies the net present value

method for the valuation of insurance contracts, which requires discounting and yield curves. IFRS17 prescribes the use of curves for discounting that match (or are very close to) the yield of an asset whose cash flow and liquidity characteristics match those of the given insurance contract. There is no substitute asset or substitute asset portfolio for cash flows arising from insurance contracts, thus the Group chooses another technique to determine the yield curves necessary for discounting.

The Group does not determine separate discount rates for cash flows dependent on the yield of underlying items and those not dependent on them.

The Group follows a bottom-up approach to determine yield curves, whereby a suitable liquid risk-free yield curve is increased by an illiquidity premium (ILP). Considering that the Group evaluates contract groups in Hungarian forints (HUF), euros (EUR), and British pounds (GBP), the calculation is performed for all three currencies. For the illiquidity adjustment of insurance contracts, the Group applies the difference (spread) between government bond yields and interest rate swap yields. This spread expresses that to achieve the yield of government bonds, they must be purchased and held, meaning these funds must be tied up, whereas in the case of interest rate swaps, there is no such tying-up obligation.

INSURANCE CONTRACTS ACQUIRED IN A BUSINESS COMBINATION OR PORTFOLIO TRANSFER

The presentation of insurance contracts acquired in a business combination under IFRS 3 or a portfolio transfer not qualifying as a business combination occurs on the acquisition (acquisition) date. If presentation on the acquisition date is not feasible, as a simplification, presentation occurs on the closest closing date to this date.

The classification and valuation of insurance contracts acquired in the above ways are based on the conditions, circumstances, and information existing at the time of acquisition, not on the conditions, circumstances, and information existing at the original inception of the contracts. The Group divides the entire set of insurance

contracts acquired in the transaction into portfolios for the purpose of determining accounting units (it is not necessary to divide them into cohorts or profitability classes), considering the profitability of each contract acquired in the transaction (within the portfolio) to be the same, as no different return expectations were applied within the portfolios during the acquisition decision.

In the case of insurance contracts acquired in a business combination under IFRS 3 or a portfolio transfer not qualifying as a business combination, the CSM to be accounted for upon presentation of the contracts is calculated based on gen-

eral rules, with the consideration received or paid for the contracts being regarded as the premium received or paid at initial recognition. When the acquisition of contracts occurred in a business combination under IFRS 3, the consideration received or paid for the contracts should be regarded as equal to the fair value (under IFRS 13) existing at the time of acquisition of the contracts. To determine fair value, the Group calculates the fair value-based risk adjustment based on the present value of risk-adjusted expected future profit, where the profit corresponds to the profit expected by a market participant upon assuming a liability, and is determined as

the cost of capital invested by the market participant upon assuming the liability.

During the acquisition of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt., the Group did not acquire any contract groups that are loss-making. During the acquisition, the Group did not acquire any held non-life reinsurance contract groups that covered disadvantageous direct contract groups. The life reinsurance contract groups acquired by the Group during the acquisition have no significant impact on the Group.

ASSET RECOGNISED IN RESPECT OF INSURANCE ACQUISITION CASH FLOWS

Upon the acquisition of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt., the Group identified assets recognised in respect of insurance acquisition cash flows, which are accounted for at the fair value of the right to acquire future insurance contracts (right arising from the

renewal of customer relationships).

The Group examines the recoverability of these insurance acquisition cash flow assets if facts and circumstances indicate that the asset is impaired, and if so, the Group accounts for an impairment.

The useful life of the asset recognised in this way is determined by the Group in line with the churn rate. The asset recognised in respect of insurance acquisition cash flows is expected to amortise in line with the useful life and churn rate (in a declining manner).

HANDLING OF NON-LIFE INSURANCE CONTRACT LIABILITIES AT AND AFTER THE TRANSACTION:

At the moment of the transaction, some contracts provide coverage for events that have already occurred, but their financial impact is still uncertain at the moment of the transaction. Under IFRS17, these contracts meet the definition of an insurance

contract, because the existing uncertainty represents insurance risk under IFRS17.B5 (the insured event arises from the uncertainty of the ultimate claims payment). In accordance with the provisions of IFRS17, the Group treats the liabilities related to incurred claims existing at the time of the transaction on the acquired contracts as liabilities for remaining coverage (LRC). Similarly, assets arising from reinsurance contracts related to these liabilities are treated as assets for remaining coverage (ARC).

Since the nature of the related non-financial risks does not change as a result of the transaction, the Group determines the value of the risk adjustment arising from non-financial risks related to liabilities for incurred claims in accordance with the methodology for risk adjustment arising from non-financial risks for these liabilities, regardless of whether they are presented as liabilities for remaining coverage.

CASH AND CASH EQUIVALENTS

Cash and cash equivalents include cash on hand and sight deposits, as well as the

value of bonds and treasury bills with maturities of less than 3 months.

ISSUED CAPITAL

ORDINARY SHARES

Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of ordinary shares are recognised as a deduction from equity, net of any tax effects.

REPURCHASE OF ISSUED CAPITAL (TREASURY SHARES)

Repurchased shares are classified as treasury shares and are presented as a deduction from total equity. When treasury shares are sold or reissued at a later date, the amount received is presented as

an increase in equity, and any surplus or deficit from the transaction is accounted for against retained earnings. Shares repurchased for the employee share ownership programme are recorded at the ESOP Organisation, which is fully consolidated into the consolidated financial statements.

FAIR VALUE HIERARCHY

The Group uses a fair value hierarchy that categorises the inputs used in valuation techniques for determining fair value into three levels.

The Group applies the following valuations for calculating the fair value of debt

and equity-type non-current financial assets.

- for listed fixed and variable rate bonds, as well as discount treasury bills – except for government bonds and discount treasury bills introduced

into the primary dealer system – they must be valued uniformly during the valuation period using the last stock exchange closing net price, in such a way that the accrued interest up to the balance sheet date must be add-

- ed to the net price when determining the market value;
- for fixed and variable rate, and discount government securities introduced into the primary dealer system with a remaining maturity of more than 3 months, the market value must be determined as the arithmetic average of the best bid and ask net prices published by the Government Debt Management Agency (ÁKK) on the balance sheet date or the last business day before it, plus the accrued interest up to the balance sheet date;
- for fixed and variable rate and discount government securities with a remaining maturity of less than 3 months – including securities with a state guarantee – the market value

- must be determined as the sum of the net price calculated for the balance sheet date using the 3-month reference yield published by the ÁKK on the balance sheet date or the last business day before it, and the accrued interest up to the balance sheet date;
- if a debt security listed on the stock exchange – except for government securities introduced into the primary dealer system – does not have a price older than 30 days, the market value is determined using the last, volume-weighted net average price registered in over-the-counter trading and published up to the balance sheet date, plus the accrued interest up to the balance sheet date, provid-

- ed this data is not older than 30 days. The same method must be applied to debt securities not listed on the stock exchange;
- if the above valuation methods cannot be used, the net purchase price must be used in such a way that the accrued interest since the last interest payment up to the balance sheet date must be added when determining the market value.

The fair value of embedded derivatives shown among derivative transactions and contractual liabilities: is determined based on a valuation technique solely relying on market inputs, calculated based on market to market (MtM) indicators received from banks, thus based on level 2 inputs.

4. EARNINGS PER SHARE

As at 31 December 2024, the issued capital of Waberer's International Nyrt. was EUR 6,192,807, consisting of 17,693,734

dematerialised ordinary shares with a nominal value of EUR 0.35 per share. Of this, 529,115 shares were repurchased as

treasury shares (total nominal value EUR 185,190).

Number of treasury shares as at 31/12/2024: 529,115 shares
Number of treasury shares as at 31/12/2023: 214,699 shares

Nominal value: EUR 185,190
Nominal value: EUR 75,144

The weighted average of ordinary shares in 2024: 17,187,574 units
The weighted average of ordinary shares in 2023: 17,479,035 units

Number of shares recorded at the ESOP Organisation in the employee share ownership programme: 314,416 units

There was no dilutive effect in either 2024 or 2023, therefore the diluted earnings per share equals the earnings per

share.

EARNINGS PER SHARE		
	2024	2023
Profit/loss after tax in EUR thousand	21,562	29,471
Weighted average of ordinary shares	17 187,574	17 479,035
Earnings per share EUR	1,25	1,69
Diluted earnings per share EUR	1.25	1.69

5. SEGMENT INFORMATION

The IFRS 8 “operating segments” standard requires that a listed company, in the interest of transparent operations, provides appropriate information to investors. The definition of segments was carried out by dividing business activities into International Transport, Regional Contract Logistics, and Insurance Activities. The Group's management directs the operation of the company group in accordance with

Revenue and key comprehensive income statement items:

the three industry segments mentioned above.

The three operating segments include the following activities:

- **International Transport:** International Full Truck Load, i.e., complete load (hereinafter FTL) transportation and freight forwarding, as well as international groupage forwarding.
- **Regional Contract Logistics:** Do-

mestic FTL and LTL (Less than Truck Load, i.e., partial load) transportation, warehousing, in-house logistics, vehicle repair activities for third parties, and warehouse construction.

- **Insurance:** Life and non-life insurance activities.

The Group's business segment information is presented below.

2024					
DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER-SEGMENT ELIMINATION	TOTAL
Transport revenue from own fleet	276,879	89,193	0	5,148	371,220
Revenue from subcontracting	131,400	54,551	0	-7,558	178,393
Other sales revenue	34,104	108,058	80,174	-14,481	207,855
Inter-segment elimination (-)	-5,398	-11,494	0	16,891	-1
Net sales revenue	436,985	240,308	80,174	0	757,467
EBITDA	40,030	37,400	24,576	0	102,006
depreciation	-36,672	-17,779	-339	0	-54,790
EBIT	1,603	19,163	24,236	0	45,002

2023					
DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER-SEGMENT ELIMINATION	TOTAL
Transport revenue from own fleet	304,294	77,763	0	1,868	383,925
Revenue from subcontracting	107,855	34,313	0	-3,430	138,738
Other sales revenue	25,113	97,758	82,450	-17,075	188,246
Inter-segment elimination (-)	-7,497	-11,140	0	18,637	0
Net sales revenue	429,765	198,694	82,450	0	710,909
EBITDA	45,893	30,796	18,906	3	95,598
depreciation	-36,995	-15,517	-295	0	-52,807
EBIT	8,898	15,278	18,612	3	42,791

Other revenue in the case of regional contract logistics includes warehouse logistics and in-house logistics revenue, while in the insurance segment it includes insurance revenue.

The calculation logic of the two applied EBIT and EBITDA indicators annually:

	2024	2023
Operating profit/loss	41,892	42,791
Depreciation and amortisation	-54,790	-52,807
EBITDA	96,682	95,598
MD International d.o.o EBITDA	1,956	0
Petrolsped Group consolidated EBITDA	3,368	0
EBITDA adjusted	102,006	95,598
Depreciation and amortisation	-54,790	-52,807
EBIT	41,892	42,791
MD International d.o.o EBIT	1,497	0
Petrolsped Group consolidated EBIT	1,613	0
EBIT adjusted	45,002	42,791

The breakdown of other revenues by segment is shown in the table below:

DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER- SEGMENT ELIMINATION	TOTAL
2024	22,672	4,413	7,845	-137	34,793
2023	18,739	4,032	-765	-54	21,952

The breakdown of other expenses by segment is shown in the table below:

DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER-SEGMENT ELIMINATION	TOTAL
2024	-6,632	-3,172	-2,380	516	-11,668
2023	-4,788	-2,667	-1,352	212	-8,595

The breakdown of interest by segment is shown in the table below:

DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER-SEGMENT ELIMINATION	TOTAL
Interest income	2,351	9	1,961	-1,514	2,807
Interest expenses	-11,852	-3,440	-12	1,513	-13,791
Result of other financial operations	-1,571	-4,562	142	0	-5,991
Financial profit/loss 2024	-11,072	-7,993	2,091	-1	-16,975

DESCRIPTION	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	INTER-SEGMENT ELIMINATION	TOTAL
Interest income	3,594	607	1	-627	3,575
Interest expenses	-10,973	-2,291	-11	625	-12,650
Result of other financial operations	1,186	2,674	1,189	-1	5,048
Financial profit/loss 2023	-6,193	990	1,179	-3	-4,027

The breakdown of individual costs by segment is presented in the relevant sections of the cost analyses.

Actual income taxes:

DESCRIPTION	2024				2023			
	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL
Income tax expenses	-854	-2,949	-1,814	-5,617	-4,588	-2,519	-1,969	-9,076
- of which, actual income taxes	-2,346	-2,677	-1,808	-6,831	-2,874	-2,572	-4,145	-9,591
- of which, deferred tax	1,492	-272	-6	1,214	-1,714	53	2,176	515

Non-current assets:

DESCRIPTION	31/12/2024				31/12/2023			
	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL
Properties	9,452	63,097	25	72,574	10,211	63,560	117	73,888
Vehicles	112,598	54,646	245	167,489	114,979	52,454	308	167,741
Other equipment	2,808	2,924	1,205	6,937	2,226	1,407	171	3,804
Intangible assets	10,336	881	4,472	15,689	11,253	766	581	12,600
Goodwill	17,730	159	404	18,293	17,730	170	0	17,900
Deferred tax asset	2,173	2,317	0	4,990	2,932	2	0	2,934
Other non-current financial assets – other	1,574	0	0	1,574	444	0	0	444
Investments in associates and joint ventures	9,938	7,289	0	17,227	0	8	0	8
Invested financial assets measured through other comprehensive income	0	0	446,089	446,089	0	0	109,510	109,510
Invested financial assets measured at amortised historical cost	3,540	0	0	3,540	8,018	0	0	8,018
Financial assets measured at fair value through profit or loss	0	0	4,712	4,712	0	0	0	0
TOTAL NON-CURRENT ASSETS				758,614				396,847

Non-cash items from P&L:

DESCRIPTION	2024				2023			
	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL
Denominated in foreign currency Unrealised exchange differences on assets and liabilities	134	-4,005	163	-3,708	1,641	3,587	1,313	6,541
Net impairment loss on financial assets	17	-73	0	-56	137	275	0	412
Difference in provision generation and utilisation	6,262	1,444	9	7,715	5,564	1,253	142	6,959

6. INTANGIBLE ASSETS

	SOFTWARE	PROPERTY RIGHTS	TOTAL INTANGIBLE ASSETS	GOODWILL
OPENING BALANCE 01/01/2023				
Historical cost	34,017	6,135	40,152	
Accumulated depreciation impairment	-22,476	-4,592	-27,068	
Net carrying amount	11,541	1,543	13,084	17,892
CHANGES IN 2023				
Increases	1,904	705	2,609	
From exchange rate changes of assets denominated in foreign currency	-90	109	19	8
Depreciation	-1,924	-473	-2,397	
Decreases	-32	-682	-714	
Impairment	0		0	0
Closing net carrying amount	11,399	1,202	12,600	17,900
CLOSING BALANCE 31/12/2023				
Historical cost	36,102	5,251	41,353	
Accumulated depreciation and impairment	-24,704	-4,049	-28,753	
Net carrying amount	11,398	1,202	12,600	17,900
CHANGES IN 2024				
Increases	1,522	321	1,843	
Acquisition of subsidiary	2,702	1,144	3,846	404
From exchange rate changes of assets denominated in foreign currency	9	-22	-13	-11
Depreciation	-2,267	-254	-2,521	
Decreases	-63	-3	-66	
Impairment	0	0	0	
Closing net carrying amount	13,301	2,388	15,689	18,293
CLOSING BALANCE 31/12/2024				
Historical cost	50,418	6,669	57,087	
Accumulated depreciation and impairment	-37,117	-4,281	-41,398	
Net carrying amount	13,301	2,388	15,689	18,293

The significant items of intangible assets are the SAP S4/HANA enterprise resource planning system and the WIRE transportation system. The significant increases affected the WIRE transport system and the Litely transport subsystem.

GOODWILL

	31/12/2024			31/12/2023		
	CARRYING AMOUNT AT THE TIME OF CONTRACTING	ACCUMULATED IMPAIRMENT	CARRYING AMOUNT	CARRYING AMOUNT AT THE TIME OF CONTRACTING	ACCUMULATED IMPAIRMENT	CARRYING AMOUNT
LINK Sp. z.o.o.	34,877	19,724	15,153	34,877	19,724	15,153
WSZL Szállítványozási és Logisztikai Kft.	2,577	0	2,577	2,577	0	2,577
Magyar Posta Biztosítók	404	0	404	0	0	0
Other	159	0	159	170	0	170
Total	38,017	19,724	18,293	37,624	19,724	17,900

Goodwills arising from business combinations must be allocated at the acquisition date to the cash-generating units that are expected to benefit from the business combination. A significant portion of the carrying amount of goodwill is allocated to the cash-generating unit of international transport and logistics, specifically to the legal entity LINK Sp.z.o.o, which amounted to EUR 15,153 thousand as at 31/12/2024.

In 2013, the Group gained controlling influence in WSZL Transport and Logistics Kft. through a share exchange. In this case, the Group recognises goodwill in its consolidated balance sheet in the amount of EUR 2,577 thousand related to domestic transport activities.

The impairment tests performed by the Group were prepared based on the following assumptions in accordance with the IAS 36 standard:

- Assumption of long-term use of assets in the calculation of recoverable amount
- Discount rates: the recoverable amount calculations take into account the time value of money, the return rate that would be expected for an investment with similar risk, cash flow, and duration in the market.

GOODWILL IMPAIRMENT TEST RELATED TO THE FOREIGN SUBSIDIARY (LINK)

For Link, the value of goodwill at the beginning of the current year was EUR 15,153 thousand. The parent company recalculated the future recoverability of goodwill based on strategic plans developed jointly

with the company. According to the plans, the net cash-generating capacity of the business unit was determined for the next 5 business years and the terminal value extended based on the fifth year, which was discounted at a rate of 8.57% in 2024, while in the previous year it was 9.59%. The recoverable amount in 2024 was EUR 27,184 thousand, thus according to the discounted cash flow plans, impairment is not justified. The recoverable amount in 2023 was EUR 32,360 thousand. A 1% increase in the discount factor results in a EUR 1.7 million decrease in the value of the discounted cash flow plans, which still does not justify the recognition of impairment, while a 1% decrease results in a EUR 1.9 million increase. The applied terminal value rate is 0%, where a positive 1% change would result in an increase of EUR 2,357 thousand in the recoverable amount.

Considering the above, the management did not find it justified to account for impairment. According to the plans, the carrying amount will be recovered within less than a year.

Waberer's International Nyrt. acquired the Poland-registered international transport and logistics company LINK Sp.z o.o. and the temporary staffing company New-Define Sp. z o.o (formerly LINK Services Sp. z o.o) in the framework of an acquisition in 2017. The acquisition was funded from the stock offering of Waberer's International Nyrt. The Group identified goodwill related to Link Sp. z o.o., which was recognised in the balance sheet at a value of EUR 34,877 thousand. In 2018, an impairment of EUR 5,790 thousand was ac-

counted for during the goodwill valuation, and in 2019, an additional EUR 13,934 thousand. Since 2021 and during the current year, based on the plans, the parent company did not find it justified to account for further impairment for LINK's goodwill. The carrying amount of LINK's goodwill remained EUR 15,153 thousand as at the balance sheet date of 31/12/2024. In the case of LINK Sp. z o.o., since it is an independent legal entity, the goodwill calculation was derived from the cash flows of the Company's individual plans.

GOODWILL IMPAIRMENT TEST RELATED TO DOMESTIC TRANSPORT ACTIVITIES

The carrying amount of goodwill is EUR 2,577 thousand. The segment closed 2024 with profit, and future forecasts show profitability in operations. The related discounting of the net cash-generating capacity shows multiple returns based on the 5-year plans. Applying an 8.46% discount factor here, the discounted cash flows generated over 5 years result in a recoverable amount of EUR 102,824 thousand based on the 2024 calculation. The 2023 calculations showed a recoverable amount of EUR 131,041 thousand with a discount rate of 9.59% in the previous year. A 1% increase in the discount factor results in a EUR 5.9 million decrease in the value of the discounted cash flow plans, which still does not justify the recognition of impairment, while a 1% decrease results in a EUR 6.6 million increase. The applied terminal value rate is 0%, where a positive 1% change would result in an increase of EUR 10,357 thousand in the recoverable

amount. Considering the above, the management did not find it justified to account for impairment. According to the plans, the carrying amount will be recovered within less than a year.

Waberer's Group's 100% subsidiary, Gránit Biztosító Zrt., purchased 66.925% of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. from Corvinus Nemzetközi Befektetési Zrt. under a sale and purchase contract signed on 8 July 2024. The Magyar Nemzeti Bank authorised the acquisition on 26 November 2024. The sales transaction was concluded

on 29 November 2024. The consolidation of Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt. took place on the balance sheet date, 31/12/2024, and accordingly, we present the impact of the acquisition in Section 8 of the notes. The operational inclusion date is 31 December 2024, which is the first possible date when the acquired insurers' systems could support the acquisition evaluation with appropriate and accurate data, and the impact between the two dates is not material in terms of evaluation. The determination of the acquired insurers' assets

and liabilities, and the estimated value of the acquisition was done at fair value as at the balance sheet date. The difference between the value of the business combination and the value of the acquired share in the insurers' assets and liabilities determines the company value, which is EUR 404 thousand concerning the acquisition of the two insurers. During the acquisition, customer relationship value was identified as an intangible asset, amounting to EUR 1,144 thousand. The derivation of Goodwill can be found in Section 8.

7. PROPERTY, PLANT AND EQUIPMENT

The Group continuously renews its fleet, striving to establish a modern and environmentally-friendly vehicle fleet, therefore it continuously replaces its vehicles upon lease expiry.

	PROPERTIES	IFRS16 RIGHT-OF-USE ASSET FROM PROPERTIES	VEHICLES	IFRS16 RIGHT-OF-USE ASSET FROM VEHICLES	OTHER EQUIPMENT	TOTAL
OPENING BALANCE 01/01/2023						
Historical cost	79,131	43,622	269,089	237,144	21,461	369,681
Accumulated depreciation and impairment	-27,905	-8,283	-141,446	-127,529	-18,547	-187,898
Net carrying amount	51,226	35,339	127,643	109,615	2,914	181,783
CHANGES IN 2023						
Increase	29,866	2,988	101,260	91,968	2,197	133,323
Change in asset stock from exchange rate changes of assets denominated in foreign currency	2,135	1,608	2,130	1,519	452	4,717
Depreciation	-6,634	-5,402	-42,522	-40,019	-1,743	-50,899
Impairment	0	0	-365	0	0	-365
Reversal of impairment	0	0	854	0	0	854
Derecognition	-2,705	-2,354	-21,259	-14,196	-16	-23,980
Closing net carrying amount	73,888	32,179	167,741	148,887	3,804	245,433
CLOSING BALANCE 31/12/2022 OPENING 2023						
Historical cost	101,643	39,873	322,229	284,978	23,934	447,806
Accumulated depreciation and impairment	-27,755	-7,694	-154,488	-136,091	-20,130	-202,373
Net carrying amount	73,888	32,179	167,741	148,887	3,804	245,433
CHANGES IN 2024						
Increase	9,608	862	70,731	69,089	3,773	84,110
Acquisition of subsidiary	79	0	0	0	1,006	1,085
Change in asset stock from exchange rate changes of assets denominated in foreign currency	-2,039	-1,773	-3,067	-1,751	-6	-5,112
Depreciation	-7,805	-6,309	-42,847	-39,307	-1,617	-52,269
Impairment	0	0	0	0	0	0

Reversal of impairment	0	0	0	0	0	0
Derecognition	-1,078	-769	-26,367	-25,907	-102	-27,547
Reclassification to non-current assets held for sale	0	0	1,298	1,229	0	1,298
Closing net carrying amount	72,653	24,190	167,489	152,240	6,858	247,000
Historical cost	102,346	33,145	298,810	267,886	29,606	430,762
Accumulated depreciation and impairment	-29,693	-8,955	-131,321	-115,646	-22,748	-183,762
Net carrying amount	72,653	24,190	167,489	152,240	6,858	247,000

(A) SIGNIFICANT PROPERTIES

The following table contains the Group's most significant properties as at 31/12/2024.

PROPERTY	COUNTRY	FUNCTION	NET VALUE
Right-of-use IFRS 16 (WSZL Kft.)	Hungary	Leased warehouse - site	29,848
Right-of-use IFRS 16 (LINK sp z.o.o)	Poland	Leased property – site	2,196
Budapest, Nagykőrösi út 349-351	Hungary	Central site	5,224
Mosonmagyaróvár	Hungary	Site - workshop	997
BILK (Pestszentlőrinc Logistics Centre)	Hungary	Logistics warehouse	7,856
Páty Geodis – investment on leased property	Hungary	Logistics warehouse/Office building	578
Győr	Hungary	Logistics warehouse	332
Miskolc	Hungary	Logistics warehouse	184

CHANGES IN PROPERTY, PLANT AND EQUIPMENT

In 2024, the gross value of properties increased by EUR 9,608 thousand, of which a significant item is the investment in the Ecser logistics centre, amounting to EUR

5,615 thousand. A significant change occurred in the vehicles line, where in 2024 the vehicle fleet underwent renewal and a larger quantity of trucks and trailers were

acquired, typically under leasing agreements.

ASSETS ENCUMBERED WITH MORTGAGE

As at the balance sheet date of 31/12/2024, the Group has the following assets encumbered with mortgages:

CONTRACT NUMBER	CONTRACT NAME	SUBJECT MATTER	ELIGIBLE ENTITY	COLLATERAL PROVIDER	INSURED AMOUNT
-	Pledge agreement and supplementary agreement to the pledge agreement	Establishment of pledge on 80 Volvo and Renault trucks	VFS Hungary Zrt.	Waberer's International Nyrt.	All existing and future claims arising from contracts against Waberer's International Nyrt. and WSZL Kft.

CONTRACT NUMBER	CONTRACT NAME	SUBJECT MATTER	ELIGIBLE ENTITY	COLLATERAL PROVIDER	INSURED AMOUNT	CARRYING AMOUNT
EKD/AS-SET-2022/16.	Amendment No. 2 to the Grant Agreement	Exclusively owned by WSZL Automotív Kft. in a 1/1 ratio	Ministry of Foreign Affairs and Trade	WSZL Automotív Kft.	HUF 7,283,556,000, that is seven billion two hundred eighty-three million five hundred fifty-six thousand forints	EUR 32,053 thousand
		Property within the administrative boundary of Ecser under top. lot number 1428/17				
RED-FK-4/2020	Amendment 3 to the Cooperation and Financial Commitment Agreement, in a consolidated structure	Exclusively owned by WABERER's INTERNATIONAL NYRT. in a 1/1 ratio	Raiffeisen Bank Zrt.	Waberer's International Nyrt.	EUR 6,000,000, that is six million euros	EUR 5,163 thousand
		under top. lot number 195853/13 and				
		top. lot number 195853/3				
51836257/TL/000/2023	EUR 11,914,144 fixed-term, investment purpose loan agreement	Exclusively owned by KDI Property Kft. in a 1/1 ratio	ING Bank N.V	KDI Property Kft.	EUR 11,914,144 EUR, that is eleven million nine hundred fourteen thousand one hundred forty-four euros	EUR 2,337 thousand
		Property under top. lot number 0254/237				
		created after plot conversion from top. lot number 0254/220				

RIGHT-OF-USE ASSET

Right-of-use assets are accounted for in accordance with IFRS 16. The lease liabilities

under IFRS 16 are determined based on the present value of future cash flows

as per the agreements.

Right-of-use asset vehicles:

	RIGHT-OF-USE IFRS16	
Functionality	Transport/Delivery	
Classification	Vehicles	
Values appearing in the statement of financial position:	2024	2023
Enhancement in value of right-of-use assets	69,089	91,968
Carrying amount of right-of-use assets at the end of the reporting period	152,240	148,887
Total cash outflow for leases	54,735	51,838
Values appearing in the comprehensive statement of profit and loss:		
Depreciation of right-of-use assets by category of underlying assets	39,307	40,019
Interest expenses arising from lease liabilities	9,456	8,066

Right-of-use properties:
Data for 2024:

DESCRIPTION	RIGHT-OF-USE WSZL KFT.	RIGHT-OF-USE LINK	RIGHT-OF-USE GRÁNIT BIZTOSÍTÓ	RIGHT-OF-USE WSZL AUTOMOTÍV	RIGHT-OF-USE WABERER'S INTERNATIONAL NYRT.	TOTAL
Country	Hungary	Poland	Hungary	Hungary	Hungary	
Functionality	Leased ware- house site	Leased property site	Leased proper- ty headquarters	Leased proper- ty site	Leased property site	
Classification	Properties	Properties	Properties	Properties	Properties	
VALUES APPEARING IN THE STATEMENT OF FINANCIAL POSITION						
Enhancement in value of right-of-use assets	721	0	0	93	48	862
Carrying amount of right-of- use assets at the end of the reporting period	22,750	1,313	25	62	40	24,190
Total cash outflow for leases	6,058	776	107	51	9	7,001
VALUES IN THE COMPREHENSIVE STATEMENT OF PROFIT AND LOSS						
Depreciation of right-of-use assets by category of under- lying assets	5,497	647	107	49	9	6,309
Interest expenses arising from lease liabilities	561	128	1	1	1	692

Data for 2023:

DESCRIPTION	RIGHT-OF-USE WSZL KFT.	RIGHT-OF-USE LINK	RIGHT-OF-USE GRÁNIT BIZTOSÍTÓ	RIGHT-OF-USE WSZL AUTOMOTÍV	TOTAL
Country	Hungary	Poland	Hungary	Hungary	
Functionality	Leased warehouse site	Leased property site	Leased property headquarters	Leased property site	
Classification	Properties	Properties	Properties	Properties	
VALUES APPEARING IN THE STATEMENT OF FINANCIAL POSITION					
Appreciation of right-of-use assets	2,327	375	286	0	2,988
Carrying amount of right-of-use assets at the end of the reporting period	29,848	2,196	116	19	32,179
Total cash outflow for leases	5,391	515	195	45	6,146
VALUES IN THE COMPREHENSIVE STATEMENT OF PROFIT AND LOSS					
Depreciation of right-of-use assets by category of underlying assets	4,648	515	195	44	5,402
Interest expenses arising from lease liabilities	743	0	0	1	744

8. INVESTMENTS IN SUBSIDIARIES, ASSOCIATES AND JOINT VENTURES

SUBSIDIARIES			OWNERSHIP SHARE	
COMPANY	COUNTRY	SCOPE OF ACTIVITIES	2024	2023
WSZL Kft.	Hungary	domestic transport, freight forwarding, logistics	100.00%	100.00%
Rapid Teherautószerelv Kft.	Hungary	vehicle repair	51.00%	51.00%
Waberer's Slovakia s.r.o	Slovakia	logistics	100.00%	100.00%
Közdűlő Invest Kft.	Hungary	renting of real estate	100.00%	100.00%
KDI Property Kft.	Hungary	sale of own real estate	100.00%	100.00%
WSZL Automotív Kft.	Hungary	international transport	100.00%	100.00%
Delta Rent Kft.	Hungary	vehicle trade	100.00%	100.00%
All in One Transport Kft.	Hungary	international transport	100.00%	100.00%
Nexways Cargo Kft.	Hungary	international transport	100.00%	100.00%
LINK Sp. z o.o.	Poland	international transport	100.00%	100.00%
NewDefine Sp. z o.o.	Poland	temporary employment agency activities	100.00%	100.00%
Waberer's Rail Kft.	Hungary	other support activities for transportation	100.00%	51.00%
Waberer's Romania SA	Romania	international transport and freight forwarding	100.00%	100.00%
Waberer's Network Kft.	Hungary	international groupage transport	100.00%	99.00%
Gránit Biztosító Zrt.	Hungary	insurance	100.00%	100.00%
Magyar Posta Biztosító Zrt.	Hungary	insurance	66.93%	0.00%
Magyar Posta Életbiztosító Zrt.	Hungary	insurance	66.93%	0.00%
WPL-Log Zrt.	Hungary	warehousing and storage	100.00%	100.00%
WPL Ingatlanfejlesztő Kft.	Hungary	property construction project planning	100.00%	50.00%
Waberer's Solution Kft.	Hungary	warehousing and storage	100.00%	0.00%

ASSOCIATED COMPANIES			OWNERSHIP SHARE	
COMPANY	COUNTRY	SCOPE OF ACTIVITIES	2024	2023
DeWab Logistics Kft.	Hungary	Freight transport by road, transport, consultancy	49.00%	49.00%
Petrolsped Kft.	Hungary	Rail transport	51.00%	0.00%
MD International d.o.o	Serbia	Logistics, wholesale	55.00%	0.00%

OTHER PARTICIPATIONS			OWNERSHIP SHARE	
COMPANY	COUNTRY	SCOPE OF ACTIVITIES	2024	2023
MDI Dobanovci DC d.o.o	Serbia	Other activities auxiliary to transportation	0.10%	0.00%

In 2024, the Group established LINK International Transport Kft. with 100% ownership, which was renamed Waberer's Solution Kft. after registration.

BUSINESS COMBINATIONS, SUBSIDIARY ACQUISITIONS

Completed acquisitions of Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt.:

On 08/07/2024, the Group entered into a contract to purchase 66.925% shareholdings in Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. (hereinafter collectively referred to as Posta Insurers) from Corvinus Nemzeti Befektetési Zrt. The transaction was

completed on 29/11/2024 after obtaining the necessary Hungarian National Bank (MNB) approval. The acquisition of the Posta Insurers assists the Group achieve its strategic goals with their complementary product portfolio compared to Gránit Biztosító, sales channels (notably the national postal network) and retail-focused customer portfolio. As part of the transaction, the Posta Insurers entered into a

long-term (10+ years) sales agreement with Magyar Posta Zrt., thus ensuring access to a key sales channel.

The difference between the purchase price and the fair value of the 66.925% share of the net assets of the acquired companies determines the value of the goodwill arising, which was as follows:

	PRELIMINARY FAIR VALUE
Other equipment	1,085
Intangible assets	3,846
Non-current financial assets measured through other comprehensive income	366,863
Non-current financial assets measured at fair value through profit or loss	4,712
NON-CURRENT ASSETS	376,506
Current income taxes	107
Other current assets	3,185
Financial assets measured through other comprehensive income	29,516
Financial assets measured at fair value through profit or loss	64,101
Cash	2,566
CURRENT ASSETS	99,475
Assets from held reinsurance contracts	10,933
TOTAL INSURANCE TECHNICAL ASSETS	10,933
Long-term loans and borrowings	-6,092
Deferred tax liability	-2,367
LONG-TERM LIABILITIES	-8,459
Liabilities from goods and services delivered (trade payables)	-382
Provisions	-646
Other short-term liabilities	-9,461
SHORT-TERM LIABILITIES	-10,489
Liabilities from insurance contracts	-385,483
TOTAL INSURANCE TECHNICAL LIABILITIES	-385,483
NET ASSET VALUE	82,483
NET ASSET VALUE ATTRIBUTABLE TO THE GROUP	55,202
Total consideration at exchange rate on 31/12/2024	56,086
Contingent items	-480
Less: fair value of acquired net assets	-55,202
GOODWILL ARISING ON ACQUISITION	404

Contingent items include a compensation which, according to the sale and purchase contract, is refundable to the Group as a purchase price reduction upon fulfilment

of the conditions specified in the contract. The compensation period starts on 01/01/2025 and lasts until 31/12/2028, the amount of compensation is based on an

estimate and equals the present value of the loss from taxes affecting the insurance sector.

Cash flow reconciliation, net cash used for the acquisition of subsidiaries:

NET CASH OUTFLOW ON ACQUISITION OF SUBSIDIARIES	
Consideration paid (cash)	56,086
Less: value of acquired cash	-2,566
Less: value of acquired cash equivalents	-4,122
Increased by: Subordinated loan principal transfer	5,313
NET CASH OUTFLOW	54,711

In the above table, cash and cash equivalents include securities maturing within 3 months, valued at EUR 4,122 thousand.

The goodwill acquired in the business combination represents expected future economic benefits, mainly related to synergies arising from non-life insurance operations. Goodwill is not deductible for tax purposes.

The subordinated loan principal was

paid to the seller in addition to the purchase price according to the sale and purchase contract, thus it is a loan receivable assumed from the seller.

The intangible assets include an amount for customer relationships identified during the acquisition and also appearing in the consolidated figures at EUR 1,144 thousand. The cost related to the transaction, accounted for in the profit for

the year, is EUR 328 thousand.

If the transaction had been completed on 1 January 2024, the Posta Insurers would have contributed EUR 96,906 thousand to the Group's revenue, increasing the Group's total revenue to EUR 854,807 thousand, and would have increased the current year's profit by EUR 3,726 thousand, resulting in the Group's current year profit reaching EUR 24,534 thousand.

ONGOING ACQUISITIONS:

In December 2024, the Group agreed with GYSEV Zrt. to purchase a 62.5% stake in GYSEV Cargo Zrt. from it, and committed to carry out an additional capital increase, expected to be approximately HUF 2 billion, in GYSEV Cargo Zrt. after closing, to

develop the rail logistics infrastructure, as a result of which the Group's stake will increase to 70%. GYSEV Zrt., as the current 100% owner of GYSEV Cargo Zrt., will retain a 30% stake in the company after the transaction.

The closing of the transaction is expected at the end of the first half of 2025, following the fulfilment of the conditions specified in the sale and purchase contract and the usual Hungarian and Austrian regulatory procedures.

MINORITY INTERESTS IN SUBSIDIARIES

Magyar Posta Zrt. holds a 33.07% stake in both Magyar Posta Biztosító Zrt. and Magyar Posta Életbiztosító Zrt. and a private

individual holds a 49% stake in Rapid Teherautószerző Kft.

In 2024, the Group purchased the 1%

minority stake in Waberer's Network Kft. and the 49% minority stake in Waberer's Rail Kft., with no change in control.

ASSOCIATES AND JOINT VENTURES

During the year, the Group acquired the 50% ownership from the joint management of WPL Ingatlanfejlesztő Kft., thereby gaining full control over the company and fully consolidating it as a subsidiary.

Acquisition of a 55% shareholding in

MD International d.o.o:

Based on the agreement signed on 06/10/2023, the Group acquired a 55% stake in Serbian company MD International d.o.o (MDI) in March 2024. Although the Group holds a 55% ownership stake,

due to the non-fulfilment of other corporate governance conditions, it does not exercise full control over the company, thus it is classified as an associate. The Group holds the majority of voting rights at the shareholders' meeting and supervi-

sory board meetings, except for reserved matters. In these matters, the decision of the other shareholder is also required. The former owners – two Serbian private individuals – remain in the company and each has a 22.5% shareholding. MDI's core activities are the distribution and warehousing of FMCG products (cosmetics, detergents, foodstuffs, etc.) within Serbia. MDI operates its central warehouse in Bel-

grade and has an additional 3 cross-dock warehouses in rural locations (totalling 10,000 m²), with a fleet of 140 vehicles. The acquisition of MDI aligns with the Group's announced strategy (Strategy 2027), which aims to expand its contract logistics activities in Central Europe. The regional expansion offers further growth opportunities and enables the Group to meet the increasing regionally focused

demand for logistics services from multinational clients. The Group applies the equity method to present MDI as an associate according to the IAS 28 Investments in Associates and Joint Ventures standard. The purchase price allocation was completed in February 2024.

MD International d.o.o purchase price allocation

	31/03/2024
NET ASSET VALUE	5,570
NET ASSET VALUE ATTRIBUTABLE TO THE GROUP	3,064
Total consideration (at exchange rate at time of stake acquisition)	6,670
Less: fair value of acquired net assets	3,064
Goodwill arising on acquisition	3,607

The goodwill arising on acquisition is not separated, it is included in the value of the stake.

Acquisition of a 51% shareholding in Petrolsped Kft.:

With the sale and purchase agreement signed on 10/11/2023, the Group acquired a 51% stake in Petrolsped Kft. in February 2024 and simultaneously in its subsidiaries (Petrolsped Group). Although the Group holds a 51% ownership stake, due to the non-fulfilment of other corporate governance conditions, it does not exercise full control over the company, thus it is classified as an associate. The co-owners, two private individuals, remain with Petrolsped Group, retaining a 24.5% ownership share each. Its core activities include rail freight

and transport, leasing of railway wagons, with the main transported products being construction materials (stone, gravel, sand), oil products, cereals, vehicles.

Members of Petrolsped Group:

Petrolsped Kft.: The company's main services are rail freight forwarding, leasing of wagons, and road freight forwarding. Primarily bulk cargo transport: stone, gravel, sand, cereals, oil products.

Pultrans Kft.: Engaged in rail freight forwarding of bulk materials and leasing of special wagons. Pultrans owns its own rail tank cars but does not have a locomotive fleet, relying on subcontractors for traction tasks. ■

PSP Cargo Romania: The Romanian subsidiary of Petrolsped Group performs

railway operations with its own equipment (including locomotives leased from Petrolsped) and workforce. The company holds a railway company licence for both Romania and Hungary and is currently planning to expand its operations in Hungary.

PSP Terminal Kft.: Project company for the development and operation of a terminal capable of serving intermodal activities on a long-term leased property. Location: near Szeged / Kiskundorozsma, close to the Hungarian, Serbian, and Romanian borders, next to the electric car factory under construction. Expected launch of service: 2025.

PSP Cargo Austria: A non-operating company with an Austrian operating licence.

Petrolsped Group purchase price allocation

	31/01/2024
NET ASSET VALUE	15,186
NET ASSET VALUE ATTRIBUTABLE TO THE GROUP	7,745
Total consideration (at exchange rate at time of stake acquisition)	8,920
Less: fair value of acquired net assets	7,745
Goodwill arising on acquisition	1,175

The goodwill arising on acquisition is not separated, it is included in the value of the stake.

The associated companies contributed the following period's after tax profit (+) / loss (-) to the Group's current year

consolidated result:

COMPANY NAME	COUNTRY	ACTIVITY	OWNERSHIP SHARE	PROFIT CONTRIBUTION		NET INVESTMENT VALUE		Σ	Σ
Investment in joint ventures				2024	2023	2024	2023	2024	2023
WPL Ingatlanfejlesztő Kft.	Hungary	property construction project planning	100.00%	0	-1	0	3	0	2
Investment in associates									
DeWab Logistics Kft.	Hungary	Freight transport by road, transport, consultancy	49.00%	-5	0	5	5	0	5
Petrolsped Kft.	Hungary	Rail transport	51.00%	1,192	0	8,745	0	9,937	0
MD International d.o.o	Serbia	Logistics, wholesale	55.00%	1,220	0	6,070	0	7,290	0
Total				2,407	0	14,820	8	17,227	8

From the purchase price of MD International d.o.o, EUR 600 thousand was deposited into a Serbian escrow account, which amount is reported under other current assets. The amount was released in January 2025, thus forming part of the value of the stake from then on.

STATEMENT OF FINANCIAL POSITION – ASSOCIATES AND JOINT VENTURES

Associates are entities over which the Company exercises significant influence and which are neither subsidiaries nor joint ventures. The Group's interests in associates and joint ventures are reported using the equity method. Under the equity method, the investment in an associate is

reported at historical cost, increased by the Group's share of changes in the associate's net asset value post-acquisition. Goodwill related to the associate is part of the carrying amount of the investment and is not amortised. Investments in associates and joint ventures are reviewed for objective evidence of impairment. If such evidence exists, the recoverable amount of the investment is determined and the impairment loss is accounted for. Based on the assessment of the reasons for losses accounted for in previous years, it is determined whether they may be reversed. Where decision-making is joint, it is a joint venture and these are also included by the Group using the equity method.

STATEMENT OF PROFIT AND LOSS – ASSOCIATES AND JOINT VENTURES

The statement of profit and loss includes the Group's share of the results from the operations of the associate or joint venture. Gains or losses from transactions between the Group and the associate or joint venture are eliminated to the extent of the Group's interest in the enterprises. The impairment loss recognised for the current period on net investments in associates and joint ventures is presented as a reducing item under the line "Share of profit/loss of associates and joint ventures" in the statement of profit and loss.

Data of associates:

	MD INTERNATIONAL D.O.O	PETROLSPED KFT.
	31 December 2024	31 December 2024
NON-CURRENT ASSETS	2,122	18,388
CURRENT ASSETS	20,974	18,194
EQUITY	4,562	18,536
LONG-TERM LIABILITIES	1,157	9,059
SHORT-TERM LIABILITIES	17,377	8,987
Net sales revenue	76,219	70,179
Operating profit/loss	3,155	2,817
Current year profit/loss	2,216	1,881
Group ownership share at year-end	55%	51%
Profit attributable to the Group	1,220	1,192

9. OTHER NON-CURRENT FINANCIAL ASSETS

	31 December 2024	31 December 2023
Long-term lease receivables	1,572	391
Other	2	53
Total	1,574	444

The long-term lease receivables include the lease receivables of vehicles leased

out on a long-term basis.

In addition to the above, smaller loans giv-

en to employees are included in the other amount.

Aging of lease receivables:

31 DECEMBER 2024	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	TOTAL
Lease receivable principal	38	47	164	1,156	0	1,405
Lease receivable interest	86	81	141	111	0	419
Total	124	128	305	1,267	0	1,824

31 DECEMBER 2023	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	TOTAL
Lease receivable principal	6	6	14	272	0	298
Lease receivable interest	20	22	47	58	0	147
Total	26	28	61	330	0	445

10. NON-CURRENT FINANCIAL ASSETS – DEBT INSTRUMENTS - LONG AND SHORT-TERM

LONG-TERM	31 DECEMBER 2024	31 DECEMBER 2023
FVOCI investments measured at fair value through other comprehensive income	446,089	109,510
Investments measured at amortised historical cost	3,540	8,018
Investments measured at fair value through profit or loss	4,712	0
	454,341	117,528
SHORT-TERM	31 DECEMBER 2024	31 DECEMBER 2023
FVOCI investments measured at fair value through other comprehensive income	32,921	29,113
Investments measured at amortised historical cost	400	13,357
Financial assets measured at fair value through profit or loss	74,600	0
	107,921	42,470

The investment portfolio of the Insurers, considered risk-free from a credit risk perspective, is predominantly composed of government bonds and discount treasury bills. The assets are mostly measured at fair value through other comprehensive income, as the investment portfolio aligns with the insurance activities..

Under the depositary and portfolio management agreement, the Insurer's depositaries freely shape the portfolio within the principles and restrictions set out therein,

depending on market yield levels, but do not engage in short-term trading activities.

The Group recognises corporate bonds that do not meet the SPPI criteria, as well as shares and investment units, among securities measured at fair value through profit or loss. The assets are measured at fair value and changes in fair value are recognised through profit or loss, and any fair value changes and accrued interest during subsequent measurement are rec-

ognised in the statement of profit and loss. Waberer's International Nyrt. also invested its free cash assets in low credit risk corporate EUR bonds in 2022. Based on the Company's business model, it decided to hold these securities to maturity and values its securities at amortised historical cost. During the current year, it placed its released cash in investment funds and measured them at fair value through profit or loss.

The details of the Group's long-term FVOCI investments measured at fair value through other comprehensive income are as follows:

TYPE	CURRENCY OF THE ASSET	COUNTRY CODE	MARKET VALUE 31 DECEMBER 2024	MARKET VALUE 31 DECEMBER 2023
Government bond	HUF	HU	406,343	67,382
	GBP	GB	4,275	13,136
	EUR	AT	0	981
	EUR	DE	0	1,839
	EUR	HU	9,248	12,195
	EUR	IT	0	1,524
	EUR	RO	7,412	1,942
	EUR	SI	0	1,098
	EUR	BG	515	0
Corporate bond	HUF	AT	3,891	444
	HUF	HU	8,159	2,412
	HUF	US	0	1,902
	EUR	AT	100	193
	EUR	HU	5,116	3,357
	EUR	NL	283	273
	EUR	CZ	0	411
	EUR	SI	654	216
Mortgage bond	HUF	HU	94	205
FVOCI investments measured at fair value through other comprehensive income			446,089	109,510

TYPE	CURRENCY OF THE ASSET	HISTORICAL COST 31/12/2024	HISTORICAL COST 31/12/2023
Corporate bond	EUR	3,540	8,018
Investments measured at amortised historical cost		3,540	8,018

The Group's long-term investments measured at fair value through profit or loss:

TYPE	CURRENCY OF THE ASSET	COUNTRY CODE	MARKET VALUE 31 DECEMBER 2024	MARKET VALUE 31 DECEMBER 2023
Corporate bonds	EUR	HU	505	0
Corporate bonds	HUF	HU	2,937	0
Government bonds	HUF	HU	433	0
Investment units	HUF	HU	837	0
Financial assets measured at fair value through profit or loss			4,712	0

The details of the Group's short-term FVOCI investments measured at fair value through other comprehensive income are as follows:

TYPE	CURRENCY OF THE ASSET	COUNTRY CODE	MARKET VALUE 31 DECEMBER 2024	MARKET VALUE 31 DECEMBER 2023
Government bond	HUF	HU	26,209	13,552
	GBP	GB	4,457	4,192
	EUR	DE	0	1,237
	EUR	ES	0	1,025
	EUR	HU	1,466	3,015
	EUR	IL	0	1,025
	EUR	NL	0	1,253
	EUR	RO	0	451
	EUR	IT	330	3,696
Discount treasury bill	HUF	HU	3,881	1,279
Corporate bond	HUF	HU	1,172	1,181
Term deposit	HUF	HU	3,414	17,134
TOTAL			40,930	49,040
Reclassification to cash			-8,009	-19,927
FVOCI investments measured at fair value through other comprehensive income			32,921	29,113

TYPE	CURRENCY OF THE ASSET	HISTORICAL COST 31 DECEMBER 2024	HISTORICAL COST 31 DECEMBER 2023
Corporate bond	EUR	400	13,357
Investments measured at amortised historical cost		400	13,357

The Group's short-term investments measured at fair value through profit or loss:

TYPE	CURRENCY OF THE ASSET	COUNTRY CODE	MARKET VALUE 31 DECEMBER 2024	MARKET VALUE 31 DECEMBER 2023
Shares	EUR	AT	280	0
Shares	HUF	HU	89	0
Shares	HUF	HU	4,116	0
Government bonds	HUF	HU	17,994	0
Discount treasury bills	HUF	HU	302	0
Bank bonds	CZK	CZ	405	0

Bank bonds	PLN	PL	452	0
Investment units	EUR	FR	412	0
Investment units	EUR	LU	1,824	0
Investment units	HUF	HU	44,367	0
Investment units	USD	LU	1,881	0
Investment units	USD	US	42	0
Forwards	HUF	HU	52	0
Cash and cash equivalents in UL asset funds	HUF	HU	2,686	0
TOTAL			74,902	0
Reclassification to cash			-302	0
Financial assets measured at fair value through profit or loss			74,600	0

Investments executed for the benefit of policyholders of unit-linked life insurance:

TYPE	MARKET VALUE 31 DECEMBER 2024	MARKET VALUE 31 DECEMBER 2023
Shares	465	0
Government bonds, discount treasury bills	18,729	0
Corporate bonds	77	0
Investment units	445	0
Cash and cash equivalents in UL asset funds	2,686	0
Investments executed for the benefit of policyholders of unit-linked life insurance	22,402	0

Investments underlying insurance activities:

	ITEMS UNDERLYING INSURANCE CONTRACTS CONTAINING DIRECT PARTICIPATION FEATURES		ASSETS UNDERLYING OWN INVESTMENTS AND ITEMS WITHOUT DIRECT PARTICIPATION FEATURES	
	FAIR VALUE	HISTORICAL COST	FAIR VALUE	HISTORICAL COST
Total financial assets measured through other comprehensive income	317,397	317,397	169,622	169,622
Government bonds	308,992	308,992	151,263	151,263
Discount treasury bills	566	566	3,316	3,316
Corporate bonds	4,240	4,240	10,187	10,187
Bank bond	3,599	3,599	1,347	1,347
Mortgage bond	0	0	95	95
Term deposit	0	0	3,414	3,414
Total financial assets recognised through profit or loss	58,743	58,743	10,070	10,070
Shares	1,864	1,864	2,622	2,622
Government bonds	18,427	18,427	0	0

Discount treasury bills	302	302	0	0
Corporate bonds	2,860	2,860	77	77
Bank bond	505	505	857	857
Investment units	32,087	32,087	6,475	6,475
Derivative instruments	12	12	39	39
Cash and cash equivalents in unit-linked life insurance asset funds	2,686	2,686	0	0
Total financial assets	376,140	376,140	179,692	179,692

Under IFRS 9, the expected credit loss on the portfolio of non-current financial assets is determined on a security-by-security basis.

EXPECTED CREDIT LOSS (ECL)	31 DECEMBER 2024	31 DECEMBER 2023
Recognised for investments measured at fair value through other comprehensive income	202	266
Recognised for investments measured at amortised historical cost	10	17
Total	212	283

The Company measures the loss accounted for on a financial asset at an amount equal to the 12-month expected credit loss (Stage 1, or basket 1) in the following cases:

- the credit risk of the financial asset has not increased significantly from

initial recognition to the reporting date, and

- the credit risk of the financial asset is low on the reporting date.

CRITERIA FOR SIGNIFICANT INCREASE IN CREDIT RISK

For financial assets with external ratings – if they are not low credit risk on the reporting date – the company considers a downgrade of at least 2 notches as a significant increase in credit risk.

The securities are classified as Stage 1 on the reporting date.

11. INVENTORIES

INVENTORIES	31 DECEMBER 2024	31 DECEMBER 2023
Fuel inventory	2,724	3,082
Spare parts, tyres, lubricants, other materials	613	1,666
Other materials	640	33
Total:	3,977	4,781

Fuel inventory on the balance sheet date includes stocks found in trucks and at the filling station. Their value is determined by the following method:

- the inventory at the filling station with certified meter reading.
- the fuel in the trucks is estimated

based on the data from the transport registration system.

The spare parts inventory of self-owned repair workshop was determined with an itemised inventory on the reporting date.

On 31/12/2024, the Group's management, similar to the previous year, ex-

amined the repair workshop's inventory based on the technological descriptions of vehicles acquired in the previous two years, resulting in a 100% impairment on parts that can no longer be installed in vehicles used by the Group.

	IMPAIRMENT
1 January 2023	152
Additions	18
31 December 2023	170
Additions	3
Reversal	-16
31 December 2024	157

12. RECEIVABLES FROM GOODS AND SERVICES DELIVERED (TRADE RECEIVABLES)

	31 DECEMBER 2024	31 DECEMBER 2023
Trade receivables	100,257	107,803
Impairment on receivables	-779	-724
Total	99,477	107,079

The turnover rate of trade receivables at a consolidated level changed from an average of 61.1 days in 2023 to 54.7 days in the current year.

	IMPAIRMENT
1 January 2023	1,051
Additions	178
Reversal	-481
Exchange difference	-24
31 December 2023	724
Additions	203
Reversal	-141
Exchange difference	-7
31 December 2024	779

The impairment charge includes the current year's impairments on receivables, while the impairment reversal includes reversals due to write-offs and settlements.

Under IFRS 9, the expected credit loss calculated for trade receivables is determined per legal entity according to uniform valuation principles. For trade

receivables, the Group applies an impairment matrix to determine the appropriate level of impairment.

In calculating the expected credit loss, the Group considered the following factors:

- industry risk, probability of default
- risk of the customer's country of op-

eration

- availability of credit insurance for trade receivables, consideration of limits
- for uninsured customers, risks determined based on aging

13. OTHER CURRENT ASSETS AND DERIVATIVE FINANCIAL INSTRUMENTS

OTHER CURRENT ASSETS	31 DECEMBER 2024	31 DECEMBER 2023
Foreign VAT and excise duty	10,722	10,740
Tax receivable	1,459	3,466
Employee receivables	264	122
Accruals expenses	12,474	8,262
Non-financial assets	24,919	22,589
Loans granted	59	136

Accruals income	1,717	4,361
Supplier advances	515	2,196
Deposits	5,482	5,632
Investment collateral account	1,907	6,345
E-toll	1,082	0
Ecser logistics - HIPA grant claim	3,174	0
Other insurance technical receivables (MABISZ, Policyholders)	6,302	0
Other	633	1,002
Financial instruments	20,871	19,671
Total	45,790	42,260

The foreign VAT and excise duty claim arises from VAT claims from foreign tax authorities and excise duty claims on fuels.

The value of the foreign VAT claim was EUR 4,715 thousand on 31/12/2024 compared to EUR 4,130 thousand in the previous year. The foreign VAT claim balance was at a similar level in 2024 and 2023. The future recoverability of foreign VAT claims was individually examined by Management, depending on whether they have negative information regarding the recovery or not.

The excise duty claim (against domes-

tic and foreign tax authorities) was EUR 6,007 on 31/12/2024 compared to EUR 6,609 thousand in the previous year. The future recoverability of the excise duty claim was examined by Management at year-end, during which no impairment was recognised on open claims submitted by the previous financial intermediary but not confirmed by the foreign authority.

The tax claims comprise overpayments for social security and do not include income taxes.

The accruals do not contain contractual assets; they are calculated from the accrual of income and expenses.

The deposits line includes deposits given to suppliers, for example, due to the construction of the Ecser logistics centre. The investment collateral account was also necessary due to the investment in the Ecser logistics centre, and under legal regulation, we settle with the contractor through this.

Other impairment was recognised on other current assets, primarily on debts of exited employees, claims against insurers, claims related to guarantees, and loans given.

	IMPAIRMENT
1 January 2023	1,220
Increase	107
Reversal	-103
Exchange difference	24
31 December 2023	1,248
Increase	62
Reversal	-77
Exchange difference	0
31 December 2024	1,233

DERIVATIVE FINANCIAL INSTRUMENTS

Carrying amount of hedging instruments:

	31 DECEMBER 2024	31 DECEMBER 2023
Cash flow hedge transaction – foreign exchange derivative transactions Assets	275	3,768
Cash flow hedge transaction – foreign exchange derivative transactions Liabilities	-1,189	0
Total	-914	3,768

In terms of hedge accounting, the Group currently only enters into cash flow hedges to mitigate exchange rate risks. The effective portion of the gain or loss on the

hedging transaction is recognised directly in other comprehensive income. Amounts recognised in other comprehensive income should be reclassified to the income

statement when the hedged transaction affects the result.

In other comprehensive income:

	2024	2023
Profit (+) / loss (-) during the year	-534	1,2270
Cash flow hedge cost of hedging	-399	-1,338
Effective portion of cash flow hedge reclassified to profit or loss	-2,754	-8594
Impact of income tax	440	-371
Cash-Flow hedging transactions, including deferred tax effect	-3,247	1,967

The value of derivative transactions at the reporting date is determined solely based on a valuation technique using market inputs (Level 2 fair value). From the difference in the individual revaluation of open transactions at year-end, positive revaluation differences are reported under asset-side derivative financial instruments, while negative revaluation differences are reported under liability-side derivative financial instruments.

When entering into a hedging transaction, the Group formally designates and documents the hedging relationship to which it intends to apply hedge accounting, together with the risk management objectives and strategies for entering into the transaction, such as the HUF expenses of the EUR functional currency parent

company, like wages and fuels. The Group determines a 1:1 hedge ratio, hedge ineffectiveness occurs if the amount of hedged wages or fuel becomes lower than the amount of the hedging transaction. The documentation includes the identification of the hedging transaction, the related hedged item or transaction, the nature of the risk to be hedged, and how the entity will measure the effectiveness of the hedging transaction in offsetting exposure to changes in the fair value or cash flows of the hedged item attributable to the hedged risk. These hedging transactions are expected to be effective in achieving effects that offset cash flow changes attributable to the hedged risk.

The accounting for hedging transactions that meet the strict requirements of

hedge accounting is as follows:

A cash flow hedge is the hedging of exposures arising from the variability of cash flows that are attributable to a particular risk associated with a recognised asset or liability in the statement of financial position, or a highly probable forecast transaction, which may affect the profit or loss. The effective portion of the gain or loss on the hedging transaction is recognised directly in other comprehensive income, while the ineffective portion is recognised under other income or other expenses. Amounts recognised in other comprehensive income should be reclassified to the income statement when the hedged transaction affects the result.

The Group had the following open derivative transactions (EUR sale/purchase) at the reporting date:

BANK	TRANSACTION NAME	31 DECEMBER 2024			31 DECEMBER 2023		
		TRANSACTION	NOMINAL AMOUNT	FAIR VALUE	TRANSACTION	NOMINAL AMOUNT	FAIR VALUE
K&H	FX Forward HUF purchase EUR sale	EUR 0	HUF 0	EUR 0	EUR 12,000,000	HUF 4,864,210,000	EUR 454,672
K&H	KO Forward HUF purchase EUR sale	EUR 24,000,000	HUF 9,960,720,000	EUR -218,612	EUR 0	HUF 0	EUR 0
ING Bank N.V	FX Forward HUF purchase EUR sale	EUR 0	HUF 0	EUR 0	EUR 27,000,000	HUF 11,316,145,000	EUR 1,921,973
ING Bank N.V	KO Forward HUF purchase EUR sale	EUR 31,000,000	HUF 12,863,160,000	EUR -477,523	EUR 12,000,000	HUF 4,985,880,000	EUR 459,619
CITI	KO Forward HUF purchase EUR sale	EUR 14,400,000	HUF 5,917,800,000	EUR -342,156	EUR 16,800,000	HUF 6,951,000,000	EUR 587,519
PKO bank Polski	FX Forward EUR sale PLN purchase	EUR 4,800,000	PLN 21,295,160	EUR 124,497	EUR 4,700,000	PLN 22,008,770	EUR 343,782
Santan-der	FX Forward EUR sale PLN purchase	EUR 0	PLN 0		EUR 400,000	PLN 1,977,900	
Total		EUR 74,200,000		EUR -913,795	EUR 72,900,000		EUR 3,767,566

The above open transactions have maturities within the year, i.e., in 2025, specifically scheduled to align with monthly wage payments and supplier payment deadlines.

The derivative transactions partly protect against unfavourable exchange rate effects affecting the Group's HUF expens-

es, specifically regarding income and HUF supplier cash outflows, and partly the conversion of the Polish LINK subsidiary's EUR revenues to PLN.

The average forward rate for the 2025 transactions was 414.15 HUF/EUR, while for the 2024 completed transactions it was 414.74 HUF/EUR.

Due to the fair value assessment of Cash Flow hedge transactions, the opening balance of EUR 3,391 thousand in the equity Hedge reserves was EUR -847 thousand as at 31 December 2024, which includes the hedging cost of option transactions as follows:

HEDGE RESERVES	COST OF HEDGING (OPTION TIME VALUE)	INTRINSIC VALUE OF OPTION	FORWARD TRANSACTIONS	TOTAL HEDGE RESERVES
Opening balance 01/01/2024	-1,218	2,170	2,438	3,390
Change in fair value of hedging instrument measured through other comprehensive income		-399	-135	-534
Cost of hedging accounted in other comprehensive income	-399			-399
Base modification – Reclassification within the balance sheet due to fuel hedging – without affecting other comprehensive income		-990		-990
Reclassification modification to profit or loss – affecting other comprehensive income	12	-309	-2,457	-2,754
Deferred tax	35	153	253	440
Closing balance 31/12/2024	-1,570	625	98	-847

The impact of the fair value of open derivative transactions at year-end on other comprehensive income:

	INTERNATIONAL TRANSPORT	REGIONAL CONTRACT LOGISTICS	INSURANCE	TOTAL
2024	-914	0	0	-914
2023	3,768	0	0	3,768

	2024	2023
Effective portion, accounted as revenue decreasing (+) or increasing (-)	-512	-543
Effective portion, accounted as Direct cost decreasing (-) or increasing (+)	-3,218	-10,477
Ineffective portion	-30	-187

14. ASSETS HELD FOR SALE

	31 DECEMBER 2024	31 DECEMBER 2023
Value of assets	1,299	811

Among the assets held for sale, the Group records vehicles whose lease agreements have expired and which it intends to sell, 22 units as at 31 December 2023 and 121

units as at 31 December 2024. In some cases, the Group purchases the vehicles from the lessor at the residual value specified in the lease agreements, and upon

sale, the difference between the carrying amount and the selling price is realised as a result.

The changes in assets held for sale are illustrated in the table below:

1 January 2023	1,214
Reclassification from Right-of-use asset	811
Sales	-1,214
31 December 2023	811
Reclassification from Right-of-use asset	1,229
Reclassification to Right-of-use asset	-811
Reclassification from other equipment	70
31 December 2024	1,299

15. CASH AND CASH EQUIVALENTS

Cash and cash equivalents includes petty cash and bank accounts, as well as sight or short-term deposits (with a remaining

maturity of less than 3 months) in excess of the coverage required for insurance claims reserves, as shown in the table be-

low:

	31 DECEMBER 2024	31 DECEMBER 2023
Bank account	46,325	47,115
Short-term government securities	8,311	19,927
Cash balance	31	26
Total	54,667	67,068

16. EQUITY

The issued capital of WABERER'S INTERNATIONAL Nyrt. as at 31 December 2024 is represented by 17,693,734 dematerialised ordinary shares, each with a nominal value of EUR 0.35. At the end of the current year, the Group holds 529,115 treasury shares.

Of the treasury shares, 314,416 are recorded with the Employee Share Ownership Programme organisation. The ESOP Organisation is fully consolidated in the financial statements. The current remuneration policy and the value of share-based payments to be accounted for in cash on a pro-rata basis are presented in Section 21.

The reserves line includes the results

of previous years, the current year's result, and the results of transactions with equity holders, as presented in the statement of changes in equity. The reserves line does not include any dividend payable by WABERER'S INTERNATIONAL Nyrt. after the year end, as the amount of such dividend is determined based on the data of the individual financial statements. The dividend determined for owners holding non-controlling interests based on the individual financial statements is presented in the statement of changes in equity in the economic year corresponding to the approval of the dividend payment in the Group's consolidated statements.

In April 2024, the Board of Directors, on behalf of the Annual General Meeting of Waberer's International Nyrt. for 2024, decided to pay a dividend of EUR 5,388 thousand from the 2023 business year's profit, which represented a gross dividend of HUF 120 per share. The total amount of reserves legally available for dividend payment based on the equity reconciliation of Waberer's International Nyrt. as at 31 December 2023 was EUR 39,501 thousand, which includes the dividends accounted for and due from subsidiaries until the acceptance of the report.

	31 DECEMBER 2023
Retained earnings	-12,494
Profit/loss after taxes	16,224
Dividends due accounted for until balance sheet preparation	35,771
Assets available for dividend payment	39,501
Capital reserve (+)	23,712
Revaluation reserve (if negative)	0
Total asset reduction (if negative)	0
Payable dividend	39,501

SUMMARY OF THE MAIN RIGHTS AND OBLIGATIONS OF SHAREHOLDERS BASED ON THE PROVISIONS OF THE ARTICLES OF ASSOCIATION

Shareholders may exercise their shareholder's rights in respect of the Company after having been entered into the Share Register, with the proviso that the exercise of the shareholder's right to participate in the General Meeting is regulated by Section 5.6 of the Articles of Association. The share register is maintained by KELER Központi Értéktár Zártkörűen Működő Részvénytársaság (hereinafter: KELER) and is updated monthly and before each General Meeting.

RIGHT TO DIVIDEND AND DIVIDEND

ADVANCE

From the distributable profit and the profit ordered to be distributed by the General Meeting, shareholders are entitled to a dividend pro rata to the nominal value of their share. The detailed rules of eligibility to dividends and the payment deadline are regulated by Section 4.4 of the Articles of Association.

INFORMATION AND GENERAL MEETING RIGHTS

The Board of Directors shall provide shareholders with information regarding the Company and allow them access to the Company's documents and records. Regarding matters on the agenda of the

General Meeting, the Board of Directors shall provide all shareholders with the necessary information for the discussion of the agenda item and inform the shareholders of the essential data of the report and the reports of the Board of Directors and the Supervisory Board in accordance with the rules of procedure specified in Section 4.5 of the Articles of Association.

Shareholders are entitled to attend the General Meeting, request information, table comments and proposals, and vote if they hold shares with voting rights. The letters of proxy must be incorporated in a notarised deed or a private deed of full probative force. Shareholders may appoint an authorised representative (nominee) to exercise their rights in respect of the Company, who shall exercise the

shareholder rights in their own name for the benefit of the shareholder after being registered in the share register. The shareholders and authorised representatives who may attend the General Meeting are those who have been registered in the share register by the second business day preceding the start of the General Meeting based on the ownership identification specified in the current General Business Rules of KELER. Each share with a nominal value of EUR 0.35 carries one vote. A shareholder can only vote one way.

The General Meeting shall have quorum if it has been duly convened and if it is attended by shareholders representing over 40% of the votes embodied by vot-

ing shares. If the General Meeting is not quorate one (1) hour after the time set for commencement, the chair of the General Meeting shall announce the date of the reconvened General Meeting as specified in the invitation to the General Meeting. The repeated General Meeting may be convened for a date at least five (5) days and at most twenty-one (21) days following the day of the General Meeting.

The General Meeting shall adopt its decisions by a simple majority of the votes taken into account in determining the quorum, except for cases specified by legal regulations and those listed in Sections 5.9.1(a)-(d) of the Articles of Association, where the General Meeting shall adopt its

decisions by a three-quarters majority of the votes cast.

MINORITY RIGHTS

Shareholders of the Company who together hold at least one percent of the voting rights may, at any time, request the convening of the General Meeting, indicating the reason and purpose, or submit a proposal or draft resolution for supplementing the announced agenda as specified in Section 4.8 of the Articles of Association. Further minority rights are also detailed in Section 4.8 of the Articles of Association.

17. LEASE LIABILITIES

The Group acquires vehicles and properties necessary for its core activities through lease agreements. The Group procures vehicles directly from manufac-

turers which provide a buy-back guarantee not only at the end of the term but also during the term.

The discounted values of future cash

flows under the lease agreement are reported as lease liabilities.

The breakdown of future lease payments (principal and interest) by maturity is illustrated in the following table:

31 DECEMBER 2024	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	TOTAL
Lease liabilities principal	19,653	19,694	36,530	76,502	10,095	162,475
Lease liabilities interest	4,507	4,084	6,819	8,847	542	24,799
Total	24,160	23,778	43,349	85,349	10,638	187,274
31 DECEMBER 2023	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	TOTAL
Lease liabilities principal	18,765	17,972	34,662	76,797	12,825	161,021
Lease liabilities interest	4,920	4,217	6,869	9,722	502	26,231
Total	23,684	22,189	41,531	86,520	13,328	187,252

The table shows the maturity of lease liabilities and their interest at the end of 2024 and 2023, but does not account for

the continuous replacement of assets with new lease agreements being concluded as the old ones expire.

18. PROVISIONS

	LITIGATION CASES	INSURER'S COMPENSATIONS	PENSION	TOTAL
Opening balance 1 January 2023	3,146	22,151	0	25,297
Generation and review of previous estimates	464	0	1,114	1,578
Exchange rate difference	-32			-32
Release	-2,715	-4,613	-869	-8,197
Utilisation	95		28	123
Closing balance 31 December 2023	958	17,538	273	18,769
Generation and review of previous estimates	733		89	822
Exchange rate difference	-9			-9
Release	-349	-7,158	-275	-7,782
Utilisation	-97		2	-95
Closing balance 31 December 2024	1,236	10,380	89	11,705

As at 31 December 2024, the Group recognised provisions of EUR 1,236 thousand to cover potential future obligations arising from litigation. In the current year, in nearly 50% of litigation cases, the insurer paid compensation for damages caused to customers under CMR insurance, while for own fault damages not covered by the insurer, the provision was utilised to pay compensation to customers. In the current year, the Group reviewed its litigation cases quarterly and generated provisions of EUR 733 thousand for new cases arising in the current year and those carried over from previous years.

Provisions are recognised when it becomes probable that an outflow of economic benefits will be required to settle an obligation resulting from a past event, and the expected outflow can be reliably estimated. The estimate is made by the Group's legal advisors, who assess the probability of expected negative outcomes and the expected amount of legal claims incurred, continuously monitoring litigation cases and re-estimating in the event of any changes in case outcomes. Our litigation cases arise in the ordinary course of business, thus they are well

measurable due to the appropriate experience and background assurances.

The Group establishes technical provisions for the amount payable for damages caused by the Group, which is reported among provisions in the Group's consolidated financial statements at a value of EUR 10,380 thousand. For the Group, part of the insurance activity, including property and CMR insurance, is carried out by Gránit Biztosító Zrt. In estimating damages, as these are insurance products that have been operating for years, past experience is the guiding factor, and within the group, the probability of non-payment of premiums and cancellation is low.

19. TECHNICAL INSURANCE ASSETS AND LIABILITIES

Liabilities from insurance contracts and assets from held reinsurance contracts, including those of Gránit Biztosító Zrt.,

Magyar Post Biztosító Zrt., and Magyar Posta Életbiztosító Zrt., were reported at the end of the current year for contracts

outside the Group amounting to EUR 478,468 thousand, as follows:

31 DECEMBER 2024	INSURANCE CONTRACTS	HELD REINSURANCE CONTRACTS	NET INSURANCE AND REINSURANCE ASSETS AND LIABILITIES
MTPL – Gránit	84,624	40,748	43,876
Casco – Gránit	4,959	42	4,917
Other liability insurance – Gránit	2,634	85	2,549
Other property insurance – Gránit	769	68	701
Motor third party liability insurance – MPB	26,140	10,764	15,376
Home and property insurance – MPB	1,017	174	843
Casco – MPB	378	74	304
Travel insurance – MPB	125	-	125
Accident insurance – MPB	201	-	201
Other non-life insurance – MPB	6	-	6
Life insurance with participation features – single premium;	214,381	-	214,381
Life insurance with participation features – regular premium;	120,833	- 85	120,919
Unit-linked life insurance – single premium	21,334	-	21,334
Unit-linked life insurance – regular premium	1,773	-	1,773
Other life insurance – traditional, whole life	- 1,139	-	- 1,139
Other life insurance – other products	433	-	433
Total	478,468	51,869	426,599

31 DECEMBER 2023	INSURANCE CONTRACTS	HELD REINSURANCE CONTRACTS	NET INSURANCE AND REINSURANCE ASSETS AND LIABILITIES
Motor third party liability – Gránit	77,739	37,622	40,117
Casco – Gránit	5,518	88	5,429
Other liability insurance – Gránit	1,633	88	1,545
Other property insurance – Gránit	246	15	231
Total	85,136	37,814	47,322

Changes in balances of insurance and reinsurance contracts measured by the premium allocation approach for non-life insurance contracts:

Insurance contracts	31 December 2024	31 December 2023
Opening liability	85,136	72,805
Insurance revenue	80,174	90,286
Expenses for incurred claims and other insurance services	73,722	48,591
Expenses from insurance acquisition cash flows	12,123	10,491
Adjustment of liabilities related to claims incurred before the current year	-23,567	-11,306
Insurance service expenses	62,278	47,776
Insurance service result	17,896	42,510
Net financial expenses from insurance contracts	1,768	-1,159
Effect of exchange rate changes	-2,590	5,792
Total changes in the comprehensive statement of profit and loss and other comprehensive income	18,719	37,877
Premium received	86,082	100,096
Claims paid and other insurance services	-47,896	-38,434
Paid insurance acquisition cash flows	-11,619	-10,338
Total cash flow	26,568	51,324
Reclassification to other items in the statement of financial position	0	-1,116
Liabilities from contracts acquired in business combinations during the current year	9,577	0
Closing balance	102,562	85,136

HELD REINSURANCE CONTRACTS	31 DECEMBER 2024	31 DECEMBER 2023
Opening asset value	37,814	44,771
Expense due to (net) premium ceded to reinsurers	-24,292	-24,644
Recoverable amount of expenses for incurred claims and other insurance services	38,907	7,747
Recoverable amount from expenses of insurance acquisition cash flows	0	0
Adjustment of liabilities related to claims incurred before the current year	-17,896	-9,000
Amounts recoverable from reinsurances	21,011	-1,253
Effect of changes in reinsurers' non-performance risk	0	0
Net expenses from reinsurance contracts	-3,281	0
Net financial income from reinsurance contracts	3,224	745
Effect of exchange rate changes	503	1,823
Total changes in the comprehensive statement of profit and loss and other comprehensive income	447	2,568
Paid reinsurance premiums	6,333	-2,601
Claims and other reimbursements received from reinsurer	-2,875	11,552
Commission reimbursements received from reinsurer	0	9,053
Total cash flow	3,458	18,004
Reclassification to other items in the statement of financial position	-782	-1,632
Liabilities from contracts acquired in business combinations during the current year	1,466	0
Closing balance	42,402	37,814

Changes in balances of insurance and reinsurance contracts measured by the general measurement model (GMM) for non-life insurance contracts:

INSURANCE CONTRACTS	31 DECEMBER 2024
Opening liability	0
Insurance revenue	0
Expenses for incurred claims and other insurance services	0
Expenses from insurance acquisition cash flows	0
Adjustment of liabilities related to claims incurred before the current year	0
Insurance service expenses	0
Insurance service result	0
Net financial expenses from insurance contracts	0
Effect of exchange rate changes	0
Total changes in the comprehensive statement of profit and loss and other comprehensive income	0
Premium received	0
Claims paid and other insurance services	0
Paid insurance acquisition cash flows	0
Total cash flow	0
Reclassification to other items in the statement of financial position	0
Liabilities from contracts acquired in business combinations during the current year	18,291
Closing balance	18,291

HELD REINSURANCE CONTRACTS	31 DECEMBER 2024
Opening assets from held reinsurance contracts	0
Opening liabilities from held reinsurance contracts	0
Net opening balance	0
Expense due to (net) premium ceded to reinsurers	0
Recoverable amount of expenses for incurred claims and other insurance services	0
Recovery and release of loss from onerous underlying contracts	0
Adjustment of assets related to claims incurred before the current year	0
Amounts recoverable from reinsurances	0
Investment component excluded from insurance revenue and insurance service expenses	0
Effect of changes in reinsurers' non-performance risk	0
Net expenses from reinsurance contracts	0
Net financial result from reinsurance contracts	0
Effect of exchange rate changes	0
Total changes in the comprehensive statement of profit and loss and other comprehensive income	0
Paid reinsurance premiums	0
Claims and other reimbursements received from reinsurer	0
Commission reimbursements received from reinsurer	0
Total cash flow	0
Reclassification to other items in the statement of financial position	0
Assets from contracts acquired in business combinations during the current year	9,546
Liabilities from contracts acquired in business combinations during the current year	0
Net closing balance	9,546
Closing assets from held reinsurance contracts	0
Closing liabilities from held reinsurance contracts	0
Net closing balance	9,546

Changes in balances of insurance contracts measured by the general measurement model (GMM) and variable fee approach (VFA) for life insurance contracts:

INSURANCE CONTRACTS	31 DECEMBER 2024
Opening liability	0
Insurance revenue	0
Expenses for incurred claims and other insurance services	0
Expenses from insurance acquisition cash flows	0
Adjustment of liabilities related to claims incurred before the current year	0
Insurance service expenses	0
Insurance service result	0
Net financial expenses from insurance contracts	0
Effect of exchange rate changes	0
Total changes in the comprehensive statement of profit and loss and other comprehensive income	0
Premium received	0
Claims paid and other insurance services	0
Paid insurance acquisition cash flows	0
Total cash flow	0
Reclassification to other items in the statement of financial position	0
Liabilities from contracts acquired in business combinations during the current year	357,651
Closing balance	357,651

Presentation of insurance acquisition cash flow assets:

Insurance acquisition cash flow assets	31 December 2024	
	Life segment	Non-life segment
Presented among opening assets from insurance contracts		
Presented among opening liabilities from insurance contracts		
Net opening balance		
Acquired in business combination		1,144
Other items incurred in the current year		
Recognised in the initial presentation of derecognised and acquired insurance contracts in the current year		
Impairment and its reversal		
Effect of FX rate changes		
Net closing balance	0	1,144
Presented among closing assets from insurance contracts		1,144
Presented among closing liabilities from insurance contracts		
Net closing balance	0	1,144

Expected release of insurance acquisition cash flow assets (there are no insurance acquisition cash flow assets recorded in the life insurance and Gránit Biztosító portfolio)

INSURANCE ACQUISITION CASH FLOW ASSETS	31 DECEMBER 2024				
	1 YEAR OR SOONER	BETWEEN 1-5 YEARS	BETWEEN 5-10 YEARS	10 YEARS OR LATER	TOTAL
Life insurance segment					
Non-life insurance segment	295	683	166	0	1,144
Total	295	683	166	0	1,144

INSURANCE ACQUISITION CASH FLOW ASSETS	31 DECEMBER 2024				
	1 YEAR OR SOONER	BETWEEN 1-5 YEARS	BETWEEN 5-10 YEARS	10 YEARS OR LATER	TOTAL
Motor third party liability – MPB					
Home and property insurance – MPB	10	429	128	0	567
Casco – MPB					
Travel insurance – MPB	222	105	0	0	327
Accident insurance – MPB	63	149	38	0	251
Other non-life insurance – MPB					0
Total	295	683	166	0	1,144

Supplementary information on the initial presentation of insurance contracts measured by the general measurement model (GMM) and variable fee approach (VFA) for life insurance contracts:

INSURANCE CONTRACTS	31 DECEMBER 2024		
	CONTRACTS ACQUIRED IN BUSINESS COMBINATION	ONEROUS CONTRACTS	OTHER CONTRACTS
Expenses for claims and other insurance services	313,940		
Insurance acquisition cash flows			
Present value of outgoing cash flows	313,940	-	-
Present value of incoming cash flows	0		
Risk adjustment for non-financial risks	8,590		
Contractual service margin	35,122		
Losses from initial recognition	0	-	-

Supplementary information on the initial recognition of insurance and reinsurance contracts in the current year for non-life insurance contracts measured by the general measurement model (GMM)

INSURANCE CONTRACTS	31 DECEMBER 2024		
	CONTRACTS ACQUIRED IN BUSINESS COMBINATION	ONEROUS CONTRACTS	OTHER CONTRACTS
Expenses for claims and other insurance services	15,285		
Insurance acquisition cash flows			
Present value of outgoing cash flows	15,285	0	0
Present value of incoming cash flows			
Risk adjustment for non-financial risks	1,695		
Contractual service margin	1,311		
Losses from initial recognition	0	0	0

REINSURANCE CONTRACTS	31 DECEMBER 2024		
	CONTRACTS ACQUIRED IN BUSINESS COMBINATION	ONEROUS CONTRACTS	OTHER CONTRACTS
Recoveries of claims and other insurance services	8,310		
Insurance acquisition cash flows			
Present value of incoming cash flows	8,310	0	0
Present value of outgoing cash flows			
Risk adjustment for non-financial risks	715		
Contractual service margin	521		
Losses from initial recognition	0	0	0

Development of claims liability for non-life insurance activities:

YEAR OF CLAIM OCCURRENCE	BEFORE 2020	2020	2021	2022	2023	2024	TOTAL
Total incurred gross claims value at the end of the claim occurrence year	154,454	13,688	34,563	38,573	46,431	52,343	340,053
One year later	14,174	16,186	-1,491	-3,354	-4,619	0	20,896
Two years later	5,645	-1,770	-1,881	-788	0	0	1,206
Three years later	19,676	-848	-426	0	0	0	18,402
Four years later	351	255	0	0	0	0	606
Five years later	-3,378	0	0	0	0	0	-3,378
Value of incurred gross claim cash flows as at 31 December 2024 without discounting	190,922	27,512	30,765	34,431	41,812	52,343	377,784
Of which claim cash flows paid by the end of December 2023	190,748	24,185	26,560	29,066	34,012	23,879	328,450
Unpaid gross claim cash flows as at 31 December 2024 without discounting	174	3,327	4,204	5,365	7,800	28,464	49,334
Effect of discounting							8,309
Risk adjustment related to non-financial risk							22,913
Value of gross claim reserve							80,556

YEAR OF CLAIM OCCURRENCE	BEFORE 2020	2020	2021	2022	2023	2024	TOTAL
Total incurred reinsurance claims value at the end of the claim occurrence year	33,047	5,681	15,661	16,469	11,582	13,898	96,340
One year later	5,501	5,627	-600	-147	-674	0	9,707
Two years later	15,928	-206	-984	-2,888	0	0	11,850
Three years later	-2,523	-400	-2,194	0	0	0	-5,117
Four years later	-2,648	-1,135	0	0	0	0	-3,783
Five years later	-1,530	0	0	0	0	0	-1,530
Incurred reinsurance claims value as at 31 December 2024	47,775	9,567	11,883	13,434	10,909	13,898	107,466
Of which claim cash flows paid by the end of December 2023	42,102	9,172	11,404	12,613	8,178	5,597	89,066
Unpaid gross claim cash flows as at 31 December 2024 without discounting	5,674	395	478	822	2,731	8,301	18,400
Effect of discounting							-601
Risk adjustment related to non-financial risk							3,839
Value of claim reserve recoverable from reinsurer							21,639

20. LONG AND SHORT-TERM LOANS AND BORROWINGS

Long-term loans and borrowings

	31 DECEMBER 2024	31 DECEMBER 2023
Subordinated loan principal Posta Insurers	779	0
Total	779	0

Short-term loans and borrowings

	31 DECEMBER 2024	31 DECEMBER 2023
Loans received from non-affiliated companies	0	1,511
Overdraft facilities	2,710	0
Total	2,710	1,511

Among the loans received from non-affiliated enterprises was a loan of EUR 5 million received from one of the Group's most significant suppliers, originally for a 4-year term starting from 30 June 2009, which was regularly extended in line with the successful cooperation. After the acquisi-

tion of LINK Sp.z.o.o., the Polish subsidiary was also included in the agreement. The agreement expired on 31 December 2019, and the contracting parties amended the contractual framework to maintain the delivery contractual relationship in the future, but the liability previously shown

as a loan was repaid pro rata quarterly during the term of the new agreement until 31 December 2024. The loan was repaid and closed in 2024.

The Group utilised the overdraft facility in the case of the Polish subsidiary through ING Bank.

21. OTHER LONG AND SHORT-TERM LIABILITIES AND DERIVATIVE FINANCIAL INSTRUMENTS

	31 December 2024	31 December 2023
Non-financial liabilities	25,900	22,325
Taxes	544	502
Insurance tax liability	8,286	1,759
Personnel-type liabilities	12,341	14,218
Employee liabilities from bonus payments	3,747	4,540
Employee liabilities due to untaken leave	982	1,306
Financial liabilities	23,391	21,625
Accruals	19,829	16,115
Factoring and other liabilities	3,562	5,511
Total	49,291	43,950

Personnel-type liabilities include wages and related social security charges not yet paid to employees.

Factoring and other liabilities include

customer factoring liabilities of LINK total-ling approximately EUR 1.6 million. Receiv-ables are factored with recourse. Accord-ingly, trade receivables are recognised

until collection on a gross basis against factoring liabilities. Factoring liabilities form part of other liability changes in the cash flow statement.

Accruals includes accruals for expenses and interest payable.

Liabilities from derivative transactions include negative differences on derivative

transactions open at year-end as presented in Note 15.

	31 DECEMBER 2024	31 DECEMBER 2023
Derivative financial instruments	1,189	0

Other long-term liabilities show the amount of the pro rata liability of the Group's employee share ownership programme as at 31 December 2024, valued at EUR 1,446 thousand, which started in 2024.

REMUNERATION POLICY

The aim of the Group's remuneration sys-

tem is to incentivise senior management to implement the Group's strategy and reward the achievement of objectives. The current remuneration policy is a 2-year incentive scheme for 2024-2025, which sets the 2025 EBIT target for participants in the programme.

Waberer's International Nyrt. provided a monetary contribution of HUF 1.19 billion to the ESOP, from which the organisation

purchased 314,416 shares. The shares were allocated to the 44 participants in the programme. The basis of eligibility is the product of the number of shares equal to the incentive eligibility and the 30-day average stock market price prior to payment. The expected payment date is in 2026 and may occur in cash following the acceptance of the 2025 annual report.

22. SALES REVENUE AND MEDIATED SERVICES

	2024	2023
Transport revenue from own fleet	371,219	383,925
Revenue from subcontracting	178,393	138,737
Warehouse logistics	108,059	97,759
Insurance revenue	80,174	71,924
Other sales revenue	19,622	18,564
Net sales revenue 2024	757,467	710,909

Sales revenue distribution by geographic region:

	2024	2023
Hungary	386,574	331,520
Germany	44,526	57,045
England	85,646	102,756
France	72,265	40,268
Poland	26,150	29,749
Spain	20,177	18,972
Switzerland	27,062	23,046
Netherlands	21,622	24,344
Slovakia	20,312	22,452
Italy	7,598	9,882
Austria	11,956	16,020
Sweden	10,688	10,366
Belgium	6,137	7,128
Denmark	6,290	6,265
Czech Republic	3,053	2,752
Luxembourg	2,628	2,522
Romania	740	1,111
Croatia	83	100

Other European countries	3,608	4,598
Other non-European countries	352	15
Total	757,467	710,909

IFRS 15 SALES REVENUE

INTERNATIONAL TRANSPORT SEGMENT (ITS)

The international transport segment's transport activity with its own vehicle fleet has been growing in recent years, and this growth continued in 2024, which confirms the effectiveness of the Group's operational model change in 2021.

Before 2020, the International Transport Segment followed a "taxi" model, which centrally and continuously optimised the match between trucks and assignments. During the pandemic situation, this model resulted in many uncertainties regarding revenues and truck utilisation, and it heavily relied on the lower profitability "spot" transport market. Due to the above uncertainties and low income-generating capacity, a new operation, the "commercial lane" model, was introduced in 2021, focusing on recurring orders and major trade routes within Europe. In line with the model change, the international transport segment directs its business focus towards contractual clients as opposed to spot assignments, which provides greater stability in revenues and ensures higher service quality.

In the current year, the average number of trucks used by the Group increased by 0.5% compared to the previous year, and simultaneously, the kilometre performance also increased. In addition to the decrease in fuel prices, the drop in revenue was also influenced by the market situation.

International transport contracts are typically concluded by the Group for a fixed-term of one year (approximately 80%) or on a case-by-case basis (approximately 20%) for a specific transport task. The Group concludes the contract according to international transport standards, with general rights and obligations in line with market practice. The freight rate is typically a route-specific value determined in EUR, which is supplemented by a fuel clause in longer-term contractual cases. The latter typically determines the automatic price change in the event of a

movement exceeding a specified range of an internationally accepted base price. Partners rarely provide volume guarantees, the service provider must prepare for handling varying quantities of orders at its own risk. Penalties are linked to the timely execution of pick-up (on-time pick-up) and drop-off (on-time delivery), and the service provider is entitled to charge a demurrage fee in case of waiting.

The Group not only uses its own transport assets for its international freight activities but also subcontracted transport and related other services. These services are resold to its clients in unchanged form, with the Group bearing all risks, thus qualifying as the principal. Such services include other crossing services and the resale of fuel.

REGIONAL CONTRACT LOGISTICS (RCL) SEGMENT

The regional logistics segment provides not only road freight transport but also complex logistics activities to its clients, including warehousing and other ancillary services. In the current year, revenue from warehousing services grew by over 10% to EUR 108 million. To provide warehousing activities, WSZL Kft. has contracted with two additional external property operators besides the property rented from BILK Logisztikai Zrt. and the warehouse base owned by Közdülő Invest Kft., which is part of the Group, to carry out its activities over the past years. The segment conducts its warehouse logistics activities in leased properties exceeding 200,000 square metres. In addition to complex logistics services, in 2024, the activity expanded with logistics warehouse construction services, with sales revenue reaching EUR 2.8 million in the current year.

The Group's RCL segment's own fleet sales revenue increased by 18.7% compared to the previous year due to tolls and price increases (tolls passed on to clients). Fleet growth was 7.1%, revenue per kilometre increased by 13%, and specific mileage showed a 5.1% increase. Subcontractor sales revenue increased by 56.3%, primarily due to new business.

In the RCL segment, the Group typically concludes contract logistics agreements with partners for a period of 3-5 years. Transport-type services are priced per kilometre unit, turnaround fee, or route price, while in distribution, the weight or value of the goods often forms the basis of pricing. Fuel price tracking and separate toll invoicing are typical, and in longer-term agreements, rent indexation is also common. For warehousing-type services, storage, loading and unloading fees form the basis of settlement in typical contracts, with rent and overhead price tracking, and general inflation-following pricing being characteristic.

The Group's clients are predominantly multinational corporations that work with multiple logistics providers, thus they determine the general terms of the contracts. As we have hundreds of large customers and thousands of smaller customers, the presentation of specific, individual contractual terms is not practicable.

IFRS 17 SALES REVENUE

INSURANCE SEGMENT

The sales revenue from insurance activities includes the revenue from the non-Group insurance of Gránit Biztosító Zrt., Posta Biztosító Zrt., and Posta Életbiztosító Zrt. The Insurer companies provide non-life and life insurance to their clients.

For contracts measured with the previously explained measurement methods, the insurance revenue is as follows:

The Group's revenue from insurance activities increased. This was due to a 10% increase in the contract portfolio in the current year, as well as the carry-over effect of the nearly 20% portfolio expansion in 2023. The Casco portfolio grew significantly by 39%, as did the portfolio of the new home insurance product introduced for the housing campaign.

The current year's sales revenue does not include the revenue of the acquired Posta Insurers, as the inclusion date is 31/12/2024, thus neither their revenues nor their expenses appear in the consolidated figures. The revenue from insurance

activities is shown within other revenue, classified under the insurance segment.

Insurance revenue concerning contracts evaluated with the premium allocation approach (PAA)

tion approach (PAA)

2024					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Gross premium written	70,055	15,978	3,150	1,772	90,955
Change in unearned premiums	-395	-394	8	-251	-1,032
Correction of insurance revenue from contracts evaluated with the premium allocation approach (PAA) (this includes deductions due to insurance tax)	-8,727	-962	-97	37	-9,749
Total insurance (sales) revenue from contracts evaluated with the premium allocation approach (PAA)	60,933	14,621	3,060	1,559	80,174

2023					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Gross premium written	66,598	11,808	3,172	1,014	82,592
Change in unearned premiums	-785	-390	-47	-22	-1,245
Correction of insurance revenue from contracts evaluated with the premium allocation approach (PAA) (this includes deductions due to insurance tax)	-8,277	-913	-190	-43	-9,423
Total insurance (sales) revenue from contracts evaluated with the premium allocation approach (PAA)	57,535	10,505	2,935	949	71,924

23. DIRECT COSTS

The Group's direct costs are presented by type in the following table, with explanations and analyses of each line contained in the subsequent sections:

tions and analyses of each line contained in the subsequent sections:

	2024	2023
Depreciation	54,790	52,807
Subcontractor costs	139,084	115,710
Cost of goods sold	28,146	24,277
Direct wages, benefits, and contributions	137,727	131,803
Fuel costs	86,787	92,482
Motorway and transit costs	115,348	95,716
Repair and maintenance costs	23,584	24,292
Insurance costs	8,975	0
Insurance service expenses	62,278	54,832
Reinsurance costs	3,281	24,001
Direct rental fees	4,940	5,503

Other services	3,930	3,425
Motor vehicle tax and other transport-related taxes	1,109	1,129
Total	669,979	625,976

According to the Group's accounting policy, in addition to the paid claim expenses, the change in the claims reserve and the liability for the remaining coverage is also shown among the expenses of insurance services in the statement of profit and loss. Among the expenses of insurance services, the claim expenses paid by

Gránit Biztosító Zrt. were reported for the Group's entire contract portfolio with third parties. The increase in insurance costs was caused by the increase in gross claim expenses net of the increase in reinsurance claims

BREAKDOWNS ACCORDING TO IFRS 17 DISCLOSURE OBLIGATIONS:

Expenses of insurance services for contracts measured with the premium allocation approach (PAA), in the current year only this model was applied:

DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Expenses of incurred claims and claims settlement costs	29,861	9,194	1,913	908	41,876
Expenses of incurred other insurance services (costs, other insurance service expenses)	5,748	1,339	888	304	8,279
Expenses of insurance acquisition cash flows	9,462	2,047	406	208	12,123
Insurance service expenses	45,071	12,580	3,207	1,420	62,278

2023					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Expenses of incurred claims and claims settlement costs	26,924	9,456	219	519	37,118
Expenses of incurred other insurance services (costs, other insurance service expenses)	5,164	503	877	125	6,668
Expenses of insurance acquisition cash flows	9,084	1,430	406	126	11,046
Insurance service expenses	41,171	11,389	1,502	770	54,832

Insurance acquisition expenses for non-life insurance activities:

2024					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Commissions due to insurance intermediaries	9,141	1,823	369	179	11,512
Other insurance acquisition expenses	321	224	37	29	611
Total insurance acquisition expenses	9,462	2,047	406	208	12,123

2023					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Commissions due to insurance intermediaries	8,684	1,345	368	117	10,514
Other insurance acquisition expenses	400	84	38	10	531
Total insurance acquisition expenses	9,084	1,430	406	126	11,046

24. DIRECT WAGES, BENEFITS, AND CONTRIBUTIONS

INTERNATIONAL TRANSPORT SEGMENT

DESCRIPTION	2024	2023
Direct wages and contributions	31,466	26,397
Fixed wages and contributions	24,575	19,073
Variable wages and contributions	6,891	7,324
Direct benefits	45,469	49,089
Direct wages, benefits, and contributions	76,935	75,486

Among direct wages, benefits, and contributions, the Group reports the benefits of international drivers, repair shop staff, and employees involved in domestic pre-loading and their statutory contribution burdens.

Among fixed wages and contributions, the gross wages and contribution burdens paid to drivers and repair shop staff are reported.

Among variable wages and contributions, the driver bonuses and social contributions after wages are reported. The increase in direct wages and contributions was partly due to the loss on forward contracts taken out to cover these, and partly due to the increase in the minimum wage.

Among direct benefits, the reimbursement paid to drivers, i.e., the daily allowance and the fuel savings paid as an

incentive, are reported. The reduction in benefits was caused by the partial downsizing of the Polish fleet.

Direct fixed wages and contributions, as well as variable wages and contributions, show a 19.2% increase compared to the previous year, while direct benefits decreased by 7.37% compared to the previous year.

REGIONAL CONTRACT LOGISTICS SEGMENT

DESCRIPTION	2024	2023
Direct wages and contributions	54,240	50,448
Fixed wages and contributions	26,805	22,845
Variable wages and contributions	27,435	27,603
Direct benefits	6,518	5,898
Direct wages, benefits, and contributions	60,758	56,346

Among wages, benefits, and contributions, the Group reports the benefits of domestic drivers, repair shop staff, and employees involved in warehousing and

their statutory contribution burdens.

The increase in the total amount of direct wages, benefits, and contributions reflects the impact of the wage increase

implemented in 2024.

The average number of employees of the Group in 2024 was 6,048 people and in 2023 it was 6,044 people.

25. FUEL COSTS

	2024	2023
fuel costs of international transport	68,482	74,184
fuel costs of domestic transport	18,564	18,602
elimination between segments	-259	-304
fuel costs	86,787	92,482

Both the fuel costs of international transport and domestic transport show a decrease compared to the previous year.

The above decrease was partly caused by the value of forward contracts taken out to cover fuel costs and closed with a profit,

but a significant decrease in oil prices was also observed in the market com-

pared to the previous year. The annual average Brent oil price in 2023 fell from USD 82.03

per barrel to USD 79.88 per barrel in 2024, representing a decrease of 2.6%.

As regards fuel, the fleet of alternative powertrain vehicles is continuously increasing.

Fuel costs in EUR did not change com-

pared to the base year, however, due to the less favourable EUR/HUF exchange rate, costs expressed in HUF increased by 3.3%. The distance travelled by vehicles increased by 5.1%, which we were able to achieve with lower consumption due to the age of the assets.

26. MOTORWAY AND TRANSIT COSTS

	2024	2023
international transport transit costs	78,730	74,119
of which: motorway toll	47,664	39,996
crossing costs	21,813	25,060
services used	1,171	1,054
other transit costs	8,082	8,009
domestic transport transit costs	36,755	25,446
of which: motorway toll	17,099	10,427
crossing costs	0	6
services used	18,749	14,020
other transit costs	907	993
Motorway and transit costs	115,485	99,565

The increase in domestic road tolls was significant in the current year compared to the previous year, and the number of international kilometres travelled also showed an increase.

Among other transit costs, parking fees and motorway and transit costs are reported. The reason for the increase in costs is the significantly increased parking costs due to changes in fleet operations,

as well as the partial incorporation of retrospective discounts into the invoices issued for monthly performance.

27. PROFIT/LOSS OF REINSURANCE CONTRACTS

Gránit Biztosító Zrt., Posta Életbiztosító Zrt., and Posta Biztosító Zrt. hedge their

significant risks with reinsurance contracts. The current year's figures do not

yet include the results of the reinsurance contracts of Posta Életbiztosító Zrt. and

Posta Biztosító Zrt.

We have reinsurance cover for international freight insurance (CMR and Freight), as well as for a defined range of Casco, home, and other property products. For the MTPL product, we have also taken out

excess of loss and 40% pro rata cover for a defined range.

The decrease in the reinsurance premium was caused by the modification of the pro rata reinsurance contract related to the compulsory motor third party lia-

bility insurance product, resulting in a decrease in the gross cession rate.

The Group presents revenues and expenses from reinsurance on a net basis among direct costs.

2024					
Description	Motor third party liability	Casco	Other liability insurances	Other property insurance	Total
Claims and costs ceded to reinsurers (claim recoveries, commission, and profit sharing from reinsurers)	17,376	128	60	-258	17,306
Expenses due to premiums ceded to reinsurers	-19,933	-533	-80	-41	-20,587
Net expense of held reinsurance contracts	-2,557	-405	-20	-299	-3,281

2023					
DESCRIPTION	MOTOR THIRD PARTY LIABILITY	CASCO	OTHER LIABILITY INSURANCES	OTHER PROPERTY INSURANCE	TOTAL
Claims and costs ceded to reinsurers (claim recoveries, commission, and profit sharing from reinsurers)	16,691	549	54	27	17,321
Expenses due to premiums ceded to reinsurers	-23,295	-548	-109	-50	-24,001
Net expense of held reinsurance contracts	-6,604	1	-54	-23	-6,680

28. OTHER COSTS

	2024	2023
Repair and maintenance costs	23,584	24,292
Direct rental costs	4,940	5,503
Other services	3,929	3,425
Motor vehicle tax and other transport-related taxes	1,109	1,130
Total other costs	33,562	34,349

Repair and maintenance costs show minimal decrease.

The amount of exempted leases accounted for under rental fees maturing within 1 year and below EUR 5,000 is EUR 950,000. The other part of the rental fees includes the rental of tracking systems and forklifts used for warehouse logistics, which, as non-identifiable assets, do not fall under the scope of IFRS16.

Electricity and gas costs and costs related to warehousing were accounted for under other services, which have increased compared to the previous year.

29. INDIRECT COSTS

The development of indirect costs is shown in the table below.

	2024	2023
Indirect wages and payments	45,527	43,978
Other services	29,848	23,153
Property maintenance, utility fees, and related service fees	7,869	7,763
Expert fees	4,907	4,626
IT costs	4,734	4,788
Communication costs	385	765
Company car costs	1,104	1,032
Marketing costs	699	952
Other costs	10,150	3,228
Total sales, general, and administrative Expenses	75,375	67,131

The increase in expert fees was influenced by the fees of experts involved in supporting acquisitions.

30. OTHER INCOME AND INTEREST INCOME CALCULATED USING THE EFFECTIVE INTEREST METHOD

	2024	2023
Recovery related to insured events	3,344	2,509
Recovery of penalties, default interest, fines	274	315
Employee reimbursement	1,898	1,333
Release of provisions	7,715	6,959
Insurer effective interest rate adjustment	370	1,335
Return on insurer investments	1,953	0
Reinsurance revenues XL and QS	2,710	747
Profit/loss from the sale of other property, plant and equipment	6,573	3,819
Subsidy received to offset costs	359	362
Result of vehicle sales	0	70
Other various income	9,597	4,502
Total	34,793	21,952
Interest income calculated using the effective interest method	6,415	7,926

There are two types of reinsurances. XL: Excess of Loss and QS: Quota Share

GOVERNMENT GRANTS/STATE SUBSIDIES

In 2024, the following government grants/

state subsidies were accounted for as revenue, received for the compensation of state subsidy costs. The accounting was done on a gross basis as other income, detailed as follows:

WSZL AUTOMOTÍV KFT.

Grant awarded under EKD/SSC-2022/4 investment aid call for applications for compensating personnel-type expenses of a regional service centre providing administrative services. The maximum amount of the grant is HUF 389,646 thousand, of which EUR 211 thousand was accounted

for as revenue for 2024 based on performance according to the schedule.

EKD/ASSET-2022/16 regional investment grant, non-refundable. The subject matter of the investment is the establishment of a "Warehousing and logistics centre in Ecser suitable for storing FMCG and other goods under TEÁOR code 5210". The start date of the investment project is 26/04/2021, the completion deadline is:

31 December 2024 Upon capitalisation of the property, the amount of the grant was accounted for as a reduction in historical cost. The maximum amount of the grant is HUF 6,069 million, the amount accounted for and disbursed by the end of 2024 is HUF 5,595 million.

CONCERNING SEVERAL SUBSIDIARIES OF THE GROUP,

the amount of the grant received for the compensation of training and wage costs under GINOP Plusz-3.2.1-21 "Improving the adaptability and productivity of employees and companies through workforce development" was EUR 93 thousand in 2024. Regarding the above three applications, the companies in question have met the conditions, and no further conditions are attached to them.

31. OTHER EXPENSES

	2024	2023
Expenses related to insured events	-2,565	-1,933
Penalty, fine, and default interest expenses	-2,594	-1,516
Impairment of inventories	-4	-18
Written-off receivables	-52	-243
Expenses for insurance contracts	-1,662	-1,161
Other various expenses	-4,791	-3,723
Total:	-11,668	-8,595

The income and expenses related to insured events cover vehicle and cargo damages related to transportation, as well as the indemnities received from insurers for these.

Development of insurance investment result:

DESCRIPTION	2024	2023
Interest income calculated using the effective interest method	6,415	7,926
Foreign exchange gain/loss on financial instruments	2,323	-550
Foreign exchange gain/loss from insurance and reinsurance contracts	1,047	-415
Impairment and reversal of financial assets	0	0
Other gain or loss	0	0
Other financial income	1,779	1,561
Other financial expenses	-58	-645
Total investment and financial profit/loss	11,506	7,877

32. FINANCIAL PROFIT/LOSS

	2024	2023
Other interest income	693	871
Interest income from non-current financial assets	489	1,162
Interest income from financial institutions	2,040	1,858
IFRS 16 interest on vehicle leasing	-9,456	-8,066
IFRS16 real estate lease interest	-692	-744
Interest expense on issued bonds	-3,976	-3,955
Other interest expense	-15	-354
Realised exchange difference	-2,279	-1,491
Unrealised exchange difference	-3,708	6,541
Other	-71	151
Total	-16,975	-4,027

Breakdown of unrealised exchange difference:

	2024	2023
Unrealised exchange rate profit	8,828	11,368
Unrealised exchange rate loss	-12,536	-4,827
	-3,708	6,541

The interest expense value for vehicle leases increased from EUR 8,066 thousand in 2023 to EUR 9,456 thousand in 2024, as a result of a significant change in the interest rate environment.

Significant leases within the Group in

both 2023 and 2024 are held by Waberer's International Nyrt., WSZL Kft., and LINK Sp. z.o.o.

LINK Sp. Z.o.o.'s functional currency is PLN. Similarly, WSZL Kft., keeps its books in Hungarian forint as its functional currency. Exchange rate differences on leas-

es due to changes in the EUR exchange rate resulted in a Group-level loss of EUR 4,580 thousand in 2024.

Foreign currency assets and liabilities are presented in Section 37 c).

33. INCOME TAX EXPENSES

The income tax expense included in the consolidated financial statements for the

years ending 31 December 2023 and 31 December 2024 consists of the following

elements:

	2024	2023
Innovation contribution	1,306	1,288
Local business tax	4,323	5,123
Corporate tax	1,202	3,180
Deferred tax expenses	-1,214	-515
Income tax expenses	5,617	9,076

The Group treats Hungarian corporate income tax and local business tax, innova-

tion contribution, as well as corresponding foreign income taxes as income tax, with

effects arising from different bases presented in the reconciliation of the differ-

ence between expected tax and accounted income tax.

Due to changes in the IAS 12 standard, the global minimum tax is presented as an income tax expense, with the rule that no deferred tax asset or liability can be recognised in connection with the global minimum tax.

Due to executed acquisitions, the Group has been subject to the global minimum tax from 2024, and has fulfilled its tax authority reporting obligations for

all group members. For 2024, a detailed global minimum tax calculation was prepared, covering all domestic and foreign group members and joint ventures, based on which no tax liability was established.

Pursuant to the provisions of Section 47 of Act LXXXIV of 2023 on Supplementary Taxes Ensuring the Global Minimum Tax Level and Related Amendments to Certain Tax Laws, Waberer's Group qualifies as a multinational corporate group in the initial phase of its international activ-

ities, which exempts the domestic group members from tax liability.

For foreign group members and joint ventures, the tax liability was established based on the regulations introduced by the countries of residence of the foreign entities. In accordance with the OECD guidelines, the regulations of individual countries provide the opportunity to apply CbCr safe harbour-based temporary exemptions, which were used to substantiate the tax exemption for the year 2024.

Presentation of deferred tax balance sheet items:

	2024	2023
Deferred loss, other allowance	3,933	3,095
Provision/impairment generation	1,208	852
Tangible and intangible assets	-2,207	-2,261
Other		-294
IFRS difference (Posta Insurers acquisition)	-2,462	
Other comprehensive income (HEDGE transaction)	-23	-372
Net deferred tax asset	449	1,020
Of which:		
Deferred tax asset	4,490	2,934
Of which through other comprehensive income		
Deferred tax liability	-4,041	-1,914
Of which through other comprehensive income	-23	-372
	449	1,020

The deferred tax liability significantly increased due to the deferred tax liability recorded for the difference in results between IFRS and Hungarian accounting rules by Magyar Posta Életbiztosító Zrt. and Magyar Posta Biztosító Zrt., acquired during the year.

When compiling the 2024 report, the

Group also reviewed the future recoverability of the deferred tax asset from its carry-forward loss based on the strategic plans for 2025-2029. Since 01/01/2019, Waberer's International Nyrt. and its Hungarian subsidiary companies have formed a corporate tax group which allows for joint corporate tax payment by the com-

panies.

Based on the review, the recovery of the deferred loss of the corporate tax group represented by Waberer's International Nyrt. was substantiated, thus a deferred tax asset was recorded for this item during consolidation.

YEAR OF ORIGIN/YEAR OF EXPIRY	2019/2024	2020/2025	2021/2026	2022/2027	2023/2028	2024/2029	TOTAL
Unused loss	0	4,025	5,484	5,827	9,082	11,483	35,901
Utilisation in 2024		4,025	5,484	1,028	0	0	10,537
Expected future utilisation				4,799	9,082	11,483	25,364
Expected year of future utilisation				2025	2025/2026	2026/2027	
Unused portion	0	0	0	4,799	9,082	11,483	25,364
Basis of deferred tax receivable				4,799	9,082	11,483	25,364

The reconciliation of the difference between the expected tax based on accounting profit and the actual tax liability is shown in the table below.

The amount shown among the permanent items was accounted for and presented based on the definition of affiliated enterprise according to Section 7(1)(ty)

and (x) and Section 4(23) of Act LXXXI of 1996 on Corporate Tax and Dividend Tax, as well as the regulation on related parties in the IAS 24 standard.

GROUP EFFECTIVE TAX RATE	2024	2023
Profit/loss before tax	27,323	38,763
Expected tax 9%	2,459	3,489
Actual tax	5,617	9,076
Difference	3,158	5,587
Effect of local tax and innovation contribution on the expected tax rate	5,050	4,804
Tax allowances, other effects (LCF - deferred loss)	-104	-593
Permanent items	-1,929	57
Other temporary differences	985	1,085
Different rates in Romania, Poland, Slovakia	-844	234
Total	3,158	5,587

LCF: Loss Carry Forward, deferred loss

34. CASH FLOW DISCLOSURES

	LONG-TERM LOANS	LEASING	OTHER LOANS	OVERDRAFT FACILITIES	BOND	TOTAL
Balance values 01/01/2023	0	153,136	3,347	0	113,813	270,296
Cash flow from financing activities	0	-44,254	-1,834	0	0	-46,088
New leases		96,126				96,126
Unrealised exchange differences		3,511				3,511
Cash flows not related to financing activities		-9,410				-9,410
Other items not involving cash flow		-11,857				-11,857
Effect of other items						
-Interest expense	0	8,066	0	0	3,956	12,022
-Interest paid	0	-8,066	0	0	-3,939	-12,005
Balance values 31/12/2023	0	187,252	1,513	0	113,830	302,596
Cash flow from financing activities	0	-54,735	-1,803	2,710	0	-53,828
New leases		69,089				69,089
Acquisition	779					779
Unrealised exchange differences		-2,716	290			-2,426
Cash flows not related to financing activities						0
Other items not involving cash flow		-11,616				-11,616
Effect of other items						
-Interest expense	0	9,456	0	0	3,976	13,432
-Interest paid	0	-9,456	0	0	-3,951	-13,407
Balance values 31/12/2024	779	187,274	0	2,710	113,856	304,619

35. PRESENTATION OF COSTS BY COST TYPE

	2024	2023
Net sales revenue	757,467	710,909
Change in inventory of self-manufactured goods, own performance, COGS	-254,017	-232,469
Material-type expenses	-253,294	-232,050
Personnel-type expenses	-183,254	-175,780
Depreciation and amortisation	-54,790	-52,807
Result of other income and expenses	29,540	21,283
Result of embedded derivatives (+/-)	295	3,294
Net impairment loss on financial assets	-56	412
Operating profit/loss	41,892	42,791

Breakdown of material-type expenses:

	2024	2023
Motorway and transit costs	115,348	95,716
Repair and maintenance costs	23,584	24,292
Insurance costs and expenses	71,253	54,832
Reinsurance costs	3,281	24,001
Direct rental fees	4,940	5,503
Other services	33,778	26,578
Motor vehicle tax and other transport-related taxes	1,110	1,130
Total	253,294	232,050

36. MANAGEMENT OF FINANCIAL RISKS

The Group is exposed to various types of financial risks during its operations. These risks can be categorised into the following types:

- credit risk
- liquidity risk
- market risk
- insurance risk

The Group's financial risk management tasks have been centralised to the Company's finance department.

The following sections provide a brief description of how the above risks affect the Group's exposures, and the objectives, processes, and internal policies the Group has developed and applies for measuring and managing each risk.

It is the responsibility of the Company's Board of Directors to define the Group's risk management policies and

frameworks. Its task is to develop and establish a unified risk management policy and strategy, and to continuously monitor the risks to which the Group is exposed. The Board of Directors is also responsible for the regular review of risk management policies and strategies, and for updating and modifying these in case of changes in market conditions.

CREDIT RISK

Credit risk is the risk that the Group suffers a loss due to a customer failing to meet contractual terms. For the Group, this primarily means the risk arising from customers' non-payment.

Trade receivables and other receivables

The top 10 customers accounted for 34.57% of total revenue in 2023 and

37.82% in 2024, with customers being stable payers in a low-risk category.

The Group has a diversified customer portfolio, with partners operating in various industries such as automotive, food industry, retail, FMCG, durable goods trade, and other industrial sectors. Our partners are present in different countries across Europe, so our revenue is not concentrated.

The Group has established a credit risk management policy, under which checks are conducted on all new customers regarding operations and publicly available information at the tax authority. Subsequently, the commercial credit limit is determined based on an external and internal evaluation system. The Group does not require any cover for the various trade receivables.

The Group has established long-term relationships with its customers. The occurrence of losses is not frequent. For existing customers, the Group monitors the size of outstanding exposures and overdue items as part of monthly monitoring activities. The system automatically blocks further transactions if the set limits are reached or exceeded. Individual exposures are categorised based on the number of days overdue and the legal status of the invoices.

To reduce future risks, the range of external services and providers used for risk management has been expanded. A credit insurance contract applies to a segment of the customer base, and a new provider has been involved to more effectively assess customers in the Central and Eastern European region.

At foreign subsidiaries, centralised risk

and debt collection management will be implemented after connecting to the central IT system.

In the area of collection, with increased staffing, greater emphasis is placed on proactive customer management.

The determination of impairment reflects an estimate of the potential loss the Group anticipates on its exposures to customers. The majority of the impairment is accounted for by individual impairment on individually significant items. Another part is collective impairment, which is formed for incurred but not yet identified losses in groups of similar assets. The determination of collective impairment is based on historical loss data.

The Group does not consider claims against reinsurers to be significant from a credit risk perspective, as the reinsurance partners are rated at least A-.

LIQUIDITY RISK

Liquidity risk is the risk that the Group is unable to settle its financial obligations as they fall due. The aim of liquidity management is to ensure sufficient resources are available to settle obligations when they become due.

To manage liquidity shortages, the Group has factoring agreements in place. The factoring agreements allow for the pre-financing of both trade receivables and trade payables. In the case of Hungarian factoring contracts, the factoring company bears the risk of non-payment, while in the case of LINK, it is with recourse. To mitigate liquidity risk, the Group has overdraft facility agreements with several banks.

Our factoring contracts:

BANK	CONTRACT NUMBER	TYPE	LIMIT	OPEN
Unicredit Bank	30,128	Supplier factoring	14,000	5,364
Santander	4001/6524/2020	Customer factoring	2,340	360
ING	111/2014	Customer factoring	4,212	1,244
Raiffeisen Bank	RED-FK-4/2020	Supplier factoring	6,000	3,713

The Group initiated the introduction of supplier factoring, thereby creating better conditions for subcontractor carriers. With factoring, suppliers are paid earlier, while the Group's payment terms towards them

remain unchanged. In the case of supplier factoring, it is presented as a trade payable until financial settlement is made to the bank upon the expiry of the payment term.

In April 2022, the Group issued a EUR corporate bond to ensure liquidity.

Waberers 2032/1 EUR

Issuer: Waberer's International Nyrt.

Place of issue: Hungary

Bond ISIN code	HU0000361662
Issue date	08/04/2022
Number of units	1,110
Nominal value per unit	EUR 100,000.00
Total nominal value of issue	EUR 111,000,000.00
Interest	3.5%
Term in years	10

Repayment and interest payment schedule:

DATE	ISSUE	REPAYMENT	INTEREST PAYMENT
08/04/2022	EUR 111,000,000.00		
08/04/2023		EUR 0.00	EUR -3,938,957.10
08/04/2024		EUR 0.00	EUR -3,949,746.30
08/04/2025		EUR 0.00	EUR -3,938,957.10
08/04/2026		EUR 0.00	EUR -3,938,957.10
08/04/2027		EUR -11,100,000.00	EUR -3,938,957.10
08/04/2028		EUR -11,100,000.00	EUR -3,554,775.00
08/04/2029		EUR -11,100,000.00	EUR -3,151,167.90
08/04/2030		EUR -11,100,000.00	EUR -2,757,273.30
08/04/2031		EUR -11,100,000.00	EUR -2,363,378.70
08/04/2032		EUR -55,500,000.00	EUR -1,974,878.70
Total	EUR 111,000,000.00	EUR -111,000,000.00	EUR -33,507,048.30

Covenants related to the bond issuance:

The Issuer is obliged to redeem the Bonds before the Maturity Date and initiate the cancellation of the Bond Series at KELER, (i) if remedy is possible but has not occurred within 30 days of the occurrence of the following events ("Remedy Period"), within 10 Business Days from the expiry of

the Remedy Period, or (ii) if remedy is not possible, within 30 days of the occurrence of the following events:

Deterioration of the indebtedness ratio: the ratio of the Issuer's consolidated total net financial indebtedness to the Issuer's cumulative regular EBITDA for the preceding 12 calendar months, i.e., the

value defined as "net leverage" in the Issuer's consolidated annual report rises above 4.00, based on the Issuer's audited and consolidated annual financial statements; the covenant has been fulfilled and is expected to be fulfilled at the next reporting date as well.

DESCRIPTION	31 DECEMBER 2024	31 DECEMBER 2023
Long-term liabilities from bond issuance	113,856	113,830
Portion of lease liabilities due in more than 1 year	139,336	132,242
Short-term loans and borrowings	2,710	1,511
Portion of lease liabilities due within 1 year	47,938	55,010
Long-term loans and borrowings	779	-
Other long-term liabilities	1,446	-
Gross debt	306,065	302,593
Cash and cash equivalents	54,667	67,068
Funds in purchased bonds and investment funds	14,740	21,375
Net debt	236,658	214,150
EBITDA	102,006	95,598
Net debt / EBITDA	2.32	2.24

See the definition of EBITDA in Section 5 of the notes.

Breach of dividend payment limit: the Issuer's Board of Directors proposes a dividend exceeding 30% of the relevant year's after-tax profit, where for the purpose of calculating this measure, the after-tax profit does not include (i) non-cash foreign exchange rate change effects (which are accounted for under fi-

nancial results in the annual profit and loss statement and detailed in the annual report's supplementary annex as unrealised exchange differences), (ii) non-cash asset revaluation effects (which are accounted for under other expenses in the annual profit and loss statement and detailed in the annual report's supplementary annex as impairment of goodwill, property, plant and equipment), (iii) one-off effects pre-

sented as non-recurring items (which are presented under the non-recurring items category in stock exchange reports); the covenant has been fulfilled and is expected to be fulfilled at the next reporting date as well.

Based on the above table, it is clear that the indebtedness ratio does not reach the value of 4.00, and the dividend payment limit has not been breached.

The Group's insurance liquidity risk is the risk that the insurer or reinsurer is unable to liquidate its investments and other assets to settle financial obligations as they fall due.

To eliminate potential liquidity issues, the Group always maintains the propor-

tion of short-term investments well above the expected need. For other large obligations: liquidity issues may arise in the payment of reinsurance settlements, but these payments are foreseeable and thus more easily planned.

The Group also reduces the risk of

paying large claims through reinsurance contracts.

Breakdown of the undiscounted cash flows of the Group's obligations from insurance contracts:

DATA AS AT 31/12/2024	LESS THAN 1 YEAR	BETWEEN 1-2 YEARS	BETWEEN 2-3 YEARS	BETWEEN 3-4 YEARS	BETWEEN 4-5 YEARS	MORE THAN 5 YEARS
Liabilities from insurance contracts	28,153	9,922	6,195	4,716	3,535	8,465
Total	28,153	9,922	6,195	4,716	3,535	8,465

31 DECEMBER 2023	LESS THAN 1 YEAR	BETWEEN 1-2 YEARS	BETWEEN 2-3 YEARS	BETWEEN 3-4 YEARS	BETWEEN 4-5 YEARS	MORE THAN 5 YEARS
Liabilities from insurance contracts	28,032	9,919	6,461	5,045	3,780	8,947
Total	28,032	9,919	6,461	5,045	3,780	8,947

MARKET RISK

Market risk is the risk that changes in market prices, such as foreign exchange rates, interest rates, and stock prices, affect the Group's results and the fair value of financial instruments reported in its financial statements. The aim of market risk management is to adequately control the exposure affected by market risks while maximising the achieved return. The Group's treasury department is responsible for managing market risks.

Among market risks, the Group is primarily exposed to foreign exchange risk, interest rate risk, and financial risk arising from changes in the global market price of fuel.

Waberer's Group is significantly exposed to market risk in its operations. The actual values calculated retrospectively generally differ from the exchange rates, interest rates, and raw material prices used in planning.

Furthermore, due to dependence on raw material prices, the Group uses the option of a fuel price clause in its commercial contracts to mitigate risks.

INSURANCE RISK

The Group covers its significant insurance risks with reinsurance contracts.

The solvency capital position of the Group's insurance company is adequate

in terms of both the minimum capital requirement and the solvency capital requirement, for which the Solvency II compliance report was prepared on time and in compliant manner.

The standard formula is used to calculate the solvency capital requirement. The solvency capital requirement calculated with the standard formula is the sum of the basic solvency capital requirement and the capital requirement for operational risks.

The basic capital requirement of the operational risk module consists of two parts, the capital requirement based on earned premiums and the capital requirement based on insurance technical provisions, equal to the larger of the two.

The basic solvency capital requirement consists of additional risk modules. The capital requirement for each risk module is calculated separately and then aggregated using the risk correlation matrices provided by the standard model. For the Group, the market, non-life insurance, health insurance, life insurance, and counterparty default risk modules are all relevant.

The solvency capital requirement for financial risks is given by the maximum of the change in the initial net asset value, i.e., the difference between assets and liabilities, due to a shock effect and zero. The market risk module consists of sub-risk modules for interest rate, interest

margin, foreign exchange rate, real estate market, and concentration risks.

The non-life insurance risk module consists of sub-risk modules for premium and reserve, lapse, and catastrophe risks. For these risk modules, the capital requirement is determined using the provided formulas. The capital requirement calculation is performed for all products except for passenger, sport, and chance products.

Within the health insurance risk module, capital requirements are calculated for health insurance risk sub-modules treated differently from life insurance reserving techniques and those treated similarly to life insurance reserving techniques.

The life insurance risk module reflects the risks arising from life insurance liabilities, in connection with the individual risk exposures borne and the administrative processes related to the conduct of insurance activities. The amount of the life insurance risk module is calculated by the Group using the formulas of the standard formula, aggregating the capital requirements of the sub-modules capturing life insurance risks, which are as follows: mortality risk, longevity risk, disability-morbidity risk, life insurance expense risk, lapse risk, and life insurance catastrophe risk.

Within the counterparty default risk module, type 1 and type 2 exposures are distinguished. Type 1 exposures con-

sist of exposures related to reinsurance contracts and bank deposits, thus the counterparty is likely to be rated. Type 2 exposures include receivables from intermediaries, clients, and other receivables (receivables from MABISZ, tax authorities).

FOREIGN EXCHANGE RISK

Among market risks, the Group continues to be affected to a limited extent by foreign exchange risk in 2024, as a significant portion of the Group's revenues and expenses are also incurred in the functional currency (EUR). For some members of the Group, the functional currency is RON and PLN, while for the domestic logistics company and the Insurer, the functional currency is HUF, therefore fluctuations in the RON/EUR, PLN/EUR, and HUF/EUR exchange rates pose foreign exchange risk to the Group. The ratio and volume of transactions incurred in foreign currency and functional currency are different. The cost incurred in foreign currency exceeds the revenue. For the portion of the cost not covered by revenue incurred in foreign currency (natural cover), the Group creates an open foreign exchange position, the value of which varies depending on the exchange rate movements. We manage this uncertainty in cash flow arising from exchange rate changes with foreign exchange hedging transactions (FX derivatives), for which we apply IFRS hedge accounting (cash flow hedge transactions). The Group enters into forward foreign exchange sale transactions, where it sells EUR to the banks for a specified date.

The efficiency measurement is based on the ratio between the cumulative fair value change of wages, contributions, taxes payable in HUF, and suppliers payable in HUF, and the foreign exchange hedging transactions in the ITS and RCL business segments. The basis and extent of entering into hedging transactions depend on the level of HUF costs in the two business segments.

The Group does not enter into speculative derivative transactions.

INTEREST RATE CASH FLOW RISK

The Group pays interest on its leasing and loan transactions and issued bonds. The interest payable typically consists of an interest base and an interest margin, while

for the issued bond, the interest payable is fixed. The interest base continuously changes as a result of interbank money market demand-supply effects, central bank decisions, and other factors.

CAPITAL MANAGEMENT

The Group aims to retain the confidence of investors, creditors, and the market and to support the future development of its business activities by establishing a strong capital position. The Group continuously monitors the returns achieved and the level of dividends due to the owners.

The Group's Board of Directors strives to find a balance between the advantages and security provided by a strong capital position and the higher level of borrowing that helps achieve higher returns.

The Group considers the elements of equity as capital.

There was no change in the capital management process or method in either 2024 or 2023.

The applicable legal regulations contain the following provisions regarding capital for the Company and its Hungarian subsidiaries:

Section 51(1) of Act IV of 2006 on Business Associations prescribes capital adequacy for the protection of creditors: "if, according to the annual report prepared pursuant to the Accounting Act, a business association does not have sufficient equity to cover the issued capital prescribed for its form of business association over two consecutive financial years, and the members (shareholders) of the business association fail to provide for the necessary equity within a period of three months after approval of the annual report prepared pursuant to the Accounting Act for the second year, the business association shall be required to adopt a decision within sixty days of this deadline for transformation into a different business association, or for its termination without succession."

From the Group, WPL Ingatlanfejlesztő Kft., KDI Property Kft., Dewab Logistic Kft., WSZL Autómotív Kft., and Waberer's Rail Kft. do not meet the capital requirement under the Act on Business Associations. The Group will resolve the capital position of the companies in 2025.

Pursuant to Government Decree No. 261/2012 (XIII.7.) on the professional conditions and licensing procedure of domes-

tic and international road freight transport, road freight transport in Hungary may only be carried out with a road freight transport licence, the conditions of which require the Company to demonstrate its good reputation, professional competence, and adequate financial standing.

The financial standing is adequate if the economic entity has the capital strength necessary to commence the activity and ensure uninterrupted business operations:

- its equity (own assets) in the case of a vehicle, or calculated for the first vehicle, is at least EUR 9,000, and for each additional vehicle exceeding 3.5 tonnes, at least EUR 5,000 per vehicle, and
- for each additional vehicle exceeding 2.5 tonnes but not exceeding 3.5 tonnes of permissible maximum gross weight, the equity is equivalent to EUR 900.
- it continuously fulfils its tax, customs, and contribution payment obligations, as well as its obligations towards the transport authority.

The Group members engaged in road freight transport activities, such as Waberer's International Nyrt, WSZL Kft., Nexways Cargo Kft., and LINK Sp.z.o.o., all have the appropriate capital strength or the necessary professional liability insurance to ensure compliance with the legal requirements for an adequate financial position. The LINK subsidiary complies with local regulations.

37. FINANCIAL INSTRUMENTS

CREDIT RISK

The maximum carrying amount of the Group's exposure affected by credit risk is:

	31 DECEMBER 2024	31 DECEMBER 2023
Other non-current financial assets	1,574	444
Non-current financial assets measured through other comprehensive income	446,089	109,510
Non-current financial assets measured at amortised historical cost	3,540	8,018
Financial assets measured at fair value through profit or loss	4,712	0
Receivables from goods and services delivered	99,477	107,079
Other current assets	45,790	42,260
Non-current financial assets measured through other comprehensive income - Debt instruments	32,921	29,113
Non-current financial assets measured at amortised historical cost - Debt instruments	400	13,357
Financial assets measured at fair value through profit or loss	74,600	0
Derivative financial instruments	275	3,768
Cash and cash equivalents	54,667	67,068
Maximum credit risk exposure	764,045	380,617

The maximum carrying amount of the Group's exposure to credit risk with customers, broken down by the geographical location of the customers' registered office:

	31 DECEMBER 2024	31 DECEMBER 2023
Hungary	47,933	53,211
European countries	51,477	53,868
Non-European countries	67	0
Maximum credit risk exposure to customers	99,477	107,079

The largest possible exposure affected by credit risk is the balance sheet value of trade receivables and securities investments.

Impairment on trade receivables broken down by maturity:

	31 DECEMBER 2024		31 DECEMBER 2023	
	HISTORICAL COST	IMPAIRMENT	HISTORICAL COST	IMPAIRMENT
Not overdue	96,166	296	103,370	0
Overdue between 0-90 days	3,210	14	4,303	4
Overdue between 91-180 days	166	21	-579	33
Overdue between 181-360 days	13	53	-106	5
Overdue beyond 360 days	701	395	815	682
Trade receivables	100,256	779	107,803	724

The majority of the trade receivables balance is with customers of adequate solvency.

LIQUIDITY RISK

Financial liabilities by due date:

IN EUR	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	
Lease liabilities	24,160	23,778	43,349	85,349	10,638	187,274
Liabilities from bond issuance	3,939	0	3,939	43,944	62,034	113,856
Loans and borrowings	3,489	0	0	0	0	3,489
Liabilities from goods and services delivered (trade payables)	93,762	0	0	0	0	93,762
Derivative financial instruments	1,189	0	0	0	0	1,189
Other long-term liabilities	0	0	1,446	0	0	1,446
Other short-term liabilities	49,291	0	0	0	0	49,291
Total	175,830	23,778	48,734	129,293	72,672	450,307

	31 DECEMBER 2023					
IN EUR	WITHIN 6 MONTHS	BETWEEN 6-12 MONTHS	WITHIN 1-2 YEARS	WITHIN 2-5 YEARS	BEYOND 5 YEARS	
Lease liabilities	23,684	22,189	41,531	86,520	13,328	187,252
Liabilities from bond issuance	3,950	0	3,939	33,633	99,047	140,569
Loans and borrowings	1,511	0	0	0	0	1,511
Liabilities from goods and services delivered (trade payables)	96,093	0	0	0	0	96,093
Other short-term liabilities	43,950	0	0	0	0	43,950
Total	169,188	22,189	45,470	120,153	112,375	469,375

FOREIGN EXCHANGE RISK

The Group's exposure broken down by currency:

	31 DECEMBER 2024			
	EUR	HUF	OTHER	TOTAL
Receivables from goods and services delivered	55,181	43,498	798	99,477
Other current assets and derivative financial instruments	275	45,790		46,065
Other non-current financial assets	32,173	518,576	11,512	562,262
Liabilities from bond issuance	-113,856	0	0	-113,856
Loans and borrowings	-2,710	-779	0	-3,489
Leases	-185,596	-1,678	0	-187,274
Liabilities from goods and services delivered (trade payables)	-58,446	-22,017	-13299	-93,762
Other financial instruments – liabilities	0	-50,480	0	-50,480
Net position	-272,979	532,910	-989	258,943

	31 DECEMBER 2023			
	EUR	HUF	OTHER	TOTAL
Receivables from goods and services delivered	68,380	31,235	7,464	107,079
Other current assets and derivative financial instruments	3,768	42,260	0	46,028

Other non-current financial assets – Debt instruments	35,732	106,938	17,328	159,998
Liabilities from bond issuance	-113,830	0	0	-113,830
Loans and borrowings	-1,513	0	0	-1,513
Leases	-186,732	-520	0	-187,252
Liabilities from goods and services delivered (trade payables)	-72,617	-20,076	-3,400	-96,093
Other financial instruments – liabilities	0	-43,950	0	-43,950
Net position	-266,812	115,887	21,392	-129,533

The Group's balance of receivables and liabilities in HUF as at the reporting date was revalued at an exchange rate of 410.09 HUF/EUR, the balance in Romanian leu at 4.9756 RON/EUR, and the balance in Polish zloty at 4.2731 PLN/EUR. For the 2025 business plan, the planning was done at exchange rates of 400 HUF/EUR, 4.55 PLN/EUR, and 4.9746 RON/EUR

based on exchange rate forecasts.

The open net position in HUF as at the reporting date, calculated with a reasonably probable exchange rate change estimated from historical data (4.5%), would result in a value change of 23,468 thousand EUR.

To mitigate exchange rate risks, the Group enters into derivative exchange

rate hedging transactions. On 31 December 2024, the fair value of derivative transactions based on revaluations at the balance sheet date was a loss-like fair value difference of 914 thousand EUR. In 2023, the profit-like fair value difference of derivative transactions was 3,768 thousand EUR.

FAIR VALUE OF FINANCIAL INSTRUMENTS

The following table presents the fair value and carrying amount of financial instruments for 2024 and 2023:

	2024		2023	
	FAIR VALUE	CARRYING AMOUNT	FAIR VALUE	CARRYING AMOUNT
Non-current financial assets measured through other comprehensive income	446,089	446,089	109,510	109,510
Non-current financial assets measured at amortised historical cost	3,540	3,540	8,018	8,018
Non-current financial assets measured at fair value through profit or loss	4,712	4,712	0	0
Other non-current financial assets	1,574	1,574	444	444
Receivables from goods and services delivered	99,477	99,477	107,079	107,079
Other current assets	20,871	20,871	19,671	19,671
Derivative financial instruments	275	275	3,768	3,768
Financial assets measured through other comprehensive income	32,921	32,921	29,113	29,113
Financial instruments measured at amortised historical cost	400	400	13,357	13,357
Financial assets measured at fair value through profit or loss	74,600	74,600	0	0
Cash and cash equivalents	54,667	54,667	67,068	67,068
Total financial assets	739,126	739,126	358,028	358,028
Long-term liabilities from bond issuance	113,856	113,856	113,830	113,830
Long-term lease liabilities	139,336	139,336	132,242	132,242
Long-term loans	779	779	0	0
Other long-term liabilities	1,446	1,446	0	0
Short-term loans	2,710	2,710	1,511	1,511
Short-term lease liabilities	47,938	47,938	55,010	55,010
Liabilities from goods and services delivered (trade payables)	93,762	93,762	96,093	96,093
Other short-term liabilities	23,391	23,391	21,625	21,625
Contractual obligations	0	0	240	240
Derivative financial instruments	1,189	1,189	0	0
Total financial liabilities	424,407	424,407	420,551	420,551

The fair value of financial assets and liabilities in all cases closely approximates their balance sheet value.

The determination of the fair value of financial instruments was based on the following:

- Fair value of derivative transactions: determined based on a valuation technique solely relying on market inputs, calculated based on MtM indicators from banks, thus based on level 2 inputs.
- Fair value of debt instruments: determined based on dealer prices quoted on active markets, and the exchange rates of the Government Debt Management Agency, based on level 1 inputs.

FAIR VALUE HIERARCHY	2024			2023		
	LEVEL 1 PRICES QUOTED ON ACTIVE MARKETS	LEVEL 2 VALUATION PROCEDURES BASED ON AVAILABLE MARKET DATA	LEVEL 3 VALUATION BASED ON UNMONITORABLE DATA	LEVEL 1 PRICES QUOTED ON ACTIVE MARKETS	LEVEL 2 VALUATION PROCEDURES BASED ON AVAILABLE MARKET DATA	LEVEL 3 VALUATION BASED ON UNMONITORABLE DATA
Long-term debt instruments	450,801			109,510		
Currency derivative transactions assets		275			3,768	
Currency derivative transactions liabilities		1,189			0	
Contractual obligations		0			240	
Debt instruments – short term	107,521			29,113		
Total financial assets	558,322	1,464	0	138,623	4,008	0

The Group did not have any instruments measured at fair value that were classified in the level 3 category in 2024 and 2023. (Level 3: valuation procedures based on unavailable and unmonitored market data).

INTEREST RATE RISK

Cash flow sensitivity analysis for variable interest rate financial instruments

Based on our analyses, a 10 basis point change in EURIBOR would change the interest expense payable on lease liabilities

by EUR 39 thousand, this effect was also EUR 45 thousand with a 10 basis point shift based on the 2023 audit. The change would have no impact on the Group's equity. The analysis was prepared with the assumption that all other factors (such as exchange rates) remain unchanged.

38. PROVISIONS, CONTINGENT LIABILITIES AND CONTINGENT ASSETS

The presentation of provisions by type and changes in the stock of provisions can be found in Section 16.

LITIGATION CASES

The following table shows the amounts of

provisions made for litigation, as well as the capital claims of litigation for which the Group did not make provisions (contingent liabilities) based on the assessment of available information. In such cases, the likelihood of winning the case is greater than not, meaning future cash

outflows are not anticipated.

The contingent liabilities for 2024 mostly consist of minor subcontractor transport and employee claims, but these are not significant.

2024		2023	
CAPITAL CLAIM OF LITIGATION		CAPITAL CLAIM OF LITIGATION	
Recognised provision	Contingent liability	Recognised provision	Contingent liability

1,235	268	958	41
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CONTINGENT ASSETS:

Following the European Commission's decision on 19 July 2016 – which found that five major truck manufacturers (MAN, Daimler, Volvo/Renault, Iveco, DAF) coordinated the wholesale prices of trucks over 6-16 tonnes and above, and the timing and passing on of costs for emission technologies across the entire EEA in violation of Article 101 of the TFEU between 1997 and 2011 – Waberer's Group filed a compensation claim with the Munich City Court regarding the potential overpricing by the truck manufacturers. Waberer's legal representative is the Hausfeld law firm in Germany, specialising in competition law infringements. A court-appointed

expert is currently working on determining the potential amount of damages in the case. By 31 December 2024, Waberer's Group had reached out-of-court settlement agreements with three defendant suppliers to settle the damages and release the affected suppliers from the litigation. The litigation continues with the last remaining defendant supplier still involved in the case.

The Group submitted a request to the German Federal Office for Goods Transport for the reimbursement of the truck toll paid, as the Court of Justice of the European Union in its judgment C-321/19 established that the inclusion of the costs of the German traffic police in the toll is contrary to applicable EU law. The German

parliament supplemented and amended the statutory provisions on German toll and retroactively reduced the German toll rate for the period from 28 October 2020 to 30 September 2021. According to the German parliament's position, the reimbursement is only applicable from the date of the decision of the Court of Justice of the European Union. According to our claims expert, the amount of toll refunded to Waberer's Group for the period between 28/10/2020 and 30/09/2021 based on legal regulation falls short of the estimated damage due to excess payment and does not settle the overpayments incurred before 28/10/2020, thus a test case has been initiated by the appointed legal representative.

39. CONTRACTUAL ASSETS AND LIABILITIES

One of the Group's customer contracts contains an embedded derivative, which the Group presents at fair value in the bal-

ance sheet among contractual liabilities, which was EUR 240 thousand in 2023 and zero at the end of 2024 in the books.

The Group had no contractual assets as at 31 December 2024.

40. TRANSACTIONS WITH RELATED PARTIES

Members of the Group Management as at 31/12/2024:

Zsolt Barna has held the position of Chief Executive Officer of the Company since 1 September 2021. Additionally, from 18 April 2023, he has been a member of the Company's Board of Directors, and from 28 April 2023, he has been the Chairman of the Board, thus holding the title of Chairman-CEO. Furthermore, he also serves as a member of the Board of Directors of MÁV Zrt. and WPL-Log Zrt.

Barna Erdélyi is an executive member of the Company's Board of Directors, and has served as the Director for Corporate Affairs since 1 September 2021. He also serves as Chairman of the Board of Directors of Gránit Biztosító Zrt., Magyar Posta Biztosító Zrt., Magyar Posta Életbiztosító Zrt., and LINK sp.z.o.o., Managing Director of DeWab Logistics Kft., and a member of the Executive Supervisory Board of MD INTERNATIONAL DOO Belgrade.

Szabolcs Gábor Tóth has served as Chief Financial and Strategic Officer at the Company since 23 June 2020, and as a member of the Company's Board of Directors since 12 April 2024. He also serves as a member of the Board of Directors of Gránit Biztosító Zrt., WPL-Log Zrt., and LINK sp.z.o.o., Managing Director of KDI Property Kft. and Waberer's Rail Kft., and a member of the Supervisory Board of Gránit Bank Nyrt.

Bence Nyilasy is Chief Executive Officer of Gránit Biztosító Zrt., and also a member of the Board of Directors of Gránit Biztosító Zrt., Magyar Posta Biztosító Zrt., and Magyar Posta Életbiztosító Zrt.

Marcin Kakol is Chief Executive Officer and member of the Board of Directors of LINK sp. z o.o.

Members of the Board of Directors:

NAME	STATUS	DURATION OF MANDATE
Barna Erdélyi	non-independent, executive member	01/09/2021 – 31/05/2027, or, if earlier, the date of the Annual General Meeting
Zsolt Barna	non-independent, executive member / chairman	18/04/2023 – 31/05/2026, or, if earlier, the date of the Annual General Meeting
Róbert Barlai	independent, non-executive (external) member	18/04/2023 – 31/05/2026, or, if earlier, the date of the Annual General Meeting
Dr. György Bacsa	independent, non-executive (external) member	12/04/2024 – 31/05/2027, or, if earlier, the date of the Annual General Meeting
Szabolcs Gábor Tóth	non-independent, executive member	12/04/2024 – 31/05/2027, or, if earlier, the date of the Annual General Meeting

As at 31/12/2024, the members of the Board of Directors did not hold any ordinary shares in the company.

Transactions with Management and ultimate controllers

The remuneration of key senior executives is presented in the table below.

	2024	2023
Wages and other short-term benefits	4,157	3,654
Share-based payments – ESOP programme	618	0
Total:	4,775	3,654

From 1 April 2024, based on the resolution of the General Meeting, the Company established a gross monthly honorarium of up to HUF 750,000 for the non-executive, external members of the Company's Board of Directors, while the executive members do not receive remuneration for their activities in the body based on the resolutions of the General Meeting dated 18/04/2023. The members of the Supervisory Board are entitled to receive a maximum gross monthly honorarium of HUF 350,000 according to the terms of their agency agreement, while the chair is entitled to a maximum gross monthly honorarium of HUF 500,000. The Chair of the Audit Committee is entitled to receive

a maximum gross monthly honorarium of HUF 100,000 according to the terms of their agency agreement, while the members do not receive any premium for their activities in the committee. Members do not receive separate remuneration for other committee tasks.

Transactions with companies under the ultimate control of the final controlling party

Transactions with related parties are always conducted under normal commercial terms and at market prices, considering volume, service complexity, quality, and seasonality.

Intra-group transactions and balances were eliminated during consolidation and

are, therefore, not presented in this section. Details of transactions between the Group and other related parties are provided below.

Other transactions with related parties, i.e., companies under the ultimate control of the final controlling party:

	2024	2023
Product sales and service provision – Revenue	542	102
Use of services – Expenses	1,005	7,714
Income from financial operations – Interest received	67	434
Expenses of financial operations – Lease interest paid	155	0

Services used by nature of the service:

	2024	2023
Repair costs	0	4
Transport service/subcontractor	0	190
Property rental	0	7,076
Depositary fee	59	57
Bank charges	29	20
Advertising and media costs	594	0
Consultancy costs	323	367
Total	1,005	7,714

In calculating income taxes, based on Section 7(1)(ty) and (x) and Section 4(23) of Act LXXXI of 1996 on Corporate Tax and Dividend Tax, a tax base allowance of HUF 10 billion was deducted based on other related party relationships.

Bank account and investment fund balances at the end of the period owned by other related parties managed at banks:

	31 DECEMBER 2024	31 DECEMBER 2023
Balance of EUR bank accounts	56	234
Balance of HUF bank accounts	361	407
Funds placed in investment funds	10,800	0
Balance of fixed deposits	1,775	11,393
Total	12,992	12,034

Our free cash assets are also held in short-term fixed deposits, the above amount was fixed with a maturity of 09/01/2025 and an interest rate of 2%.

	31 DECEMBER 2024	31 DECEMBER 2023
Trade payables to other related parties	18	1,843
Lease liabilities to related parties	2,304	0

41. EVENTS AFTER THE BALANCE SHEET DATE

The Group monitors the changes in the global economy occurring faster than usual. Although there is currently no information available that would raise doubts about the Group's financial performance or its ability to continue as a going concern, it cannot be ruled out that rapidly changing international political and economic conditions, currently unforeseeable, may pose uncertainties in the future regarding the completion of short and medium-term financial plans and the potential involvement of external financing.

From an operational perspective, there is a higher risk concerning drivers of Ukrainian nationality, as we employ a significant number in international transport in both our Hungarian-managed and Polish operations, whose loss may reduce our capacity utilisation. To date, the

Group has not experienced a level of risk concerning Ukrainian drivers that would endanger operations, and based on the measures taken, the risk is also considered manageable.

The Group sees significant growth opportunities in rail freight transport, partly due to new domestic industrial and automotive investments, and partly because existing clients are increasingly turning towards low-carbon logistics services.

The Group has signed a sale and purchase contract for the acquisition of a 51% stake in PANNON-BUSZ-RENT Kft. (the Company). The founder and owner of the Company is expected to remain a 49% owner of PANNON-BUSZ-RENT Kft. for an additional 2 years, and the owners will jointly further develop the company to be acquired. Founded over 20 years ago,

PANNON-BUSZ-RENT Kft. is a key player in the Hungarian road passenger transport market. Its main services include operating employee bus routes primarily for industrial and agricultural production companies, as well as managing replacement bus services and chartered bus services. The Company provides these services partly with its own and leased buses (approximately 170 vehicles) and with the help of subcontractors. In 2023, PANNON-BUSZ-RENT Kft. achieved a revenue of HUF 4.4 billion and after-tax profit exceeding HUF 500 million. The closing of the transaction is expected at the end of the first half of 2025, following the fulfilment of the conditions set out in the sale and purchase contract and the completion of the usual regulatory procedures.

42. OTHER DISCLOSURE OBLIGATIONS SET OUT IN THE ACCOUNTING ACT

The auditor of the group is PricewaterhouseCoopers Könyvvizsgáló Korlátolt Felelősségű Társaság
H-1055 Budapest, Bajcsy-Zsilinszky út 78
Company registration number: 01-09-063022

Audit fee: EUR 625 thousand

Amount paid to the auditor for non-audit services beyond the audit fee: EUR 4 thousand

The above amount includes accounting and tax advisory services.

The chamber member auditor personally responsible for the audit:

Chamber registration number: 005,589
Name: Balázs Árpád Mészáros
Address: H-1137 Budapest, Katona József u. 25. V. em. 4

The person responsible for the preparation of the consolidated financial statements under IFRS is Judit Nagy-Simon, registration number 114509.

The Company's consolidated annual report is published according to the mandatory disclosure rules prescribed by the Accounting Act on the <https://e-beszamolo.im.gov.hu/> as well as on the Company's website at <https://www.waberers.com/hu/befektetoknek/eredmeny-center>.

Persons authorised to sign the report and statements are Zsolt Barna, Chief Executive Officer, H-1022 Budapest, Alvinci út 30, MF 2. ajtó, and Szabolcs Gábor Tóth, Chief Financial Officer, H-1037 Budapest, Újvári u. 10.

