

## INDEPENDENT AUDITOR'S REPORT PROVIDING LIMITED ASSURANCE ON THE CONSOLIDATED SUSTAINABILITY REPORT OF GRÁNIT BANK NYRT.<sup>1</sup>

**To the shareholders of Gránit Bank Public Limited Company**

### **Conclusions with Limited Assurance**

We have performed a limited assurance engagement on Gránit Bank Public Limited Company ("the Company") and its subsidiaries (collectively, the "Group") "549300423T3ZCEZ1PP02-2025-12-31-1-hu.zip"<sup>2</sup> contained in the digital file, prepared as of and covering the period from January 1, 2025, to December 31, 2025 ("Consolidated Sustainability Report").

Based on the procedures we performed and the evidence we obtained, nothing has come to our attention that would lead us to believe that the Consolidated Sustainability Report for the financial year ending December 31, 2025, was not prepared, in all material respects, in accordance with the applicable Criteria.

### **Basis for our conclusion**

We performed the engagement for a limited assurance service in accordance with Hungarian National Standard No. 3000, "Engagements for Assurance Services Other Than Audits or Reviews of Historical Financial Information" ("the applicable standard")

In the case of a limited assurance engagement, both the procedures for assessing risks, including understanding internal controls, and the scope of procedures performed in response to the assessed risks are more limited than in a reasonable assurance engagement. In a limited assurance engagement, the procedures performed differ in nature, timing, and extent from those in a reasonable assurance engagement. As a result, the level of assurance obtained is significantly lower than it would have been had a reasonable assurance engagement been performed. We designed our procedures to ensure that the evidence obtained is sufficient to provide limited assurance and to support our conclusions.

We declare that we are independent of the Group and adhere to the principles of integrity, objectivity, professional competence, and due care, confidentiality, and professional conduct, as well as the laws in force in Hungary and the Hungarian Chamber of Auditors' "Regulations on the Rules of Conduct (Ethics) of the Auditing Profession and Disciplinary Proceedings," and, with respect to matters not addressed therein, the handbook titled "International Code of Ethics for

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<sup>1</sup> This is an English translation of the Independent auditor's report providing limited assurance on the consolidated sustainability Report on the 2025 consolidated financial statement of the Gránit Bank Public Limited Company issued in Hungarian. If there are any differences, the Hungarian language original prevails

<sup>2</sup> HASH kód: 07019a88ae02fb64c392f01cab8f9df881f13861776fa758a07403b9e2afda7e

Members of the Chamber (Combined with the International Standards on Independence)" issued by the International Ethics Standards Board for Accountants ("IESBA Code") and comply with the additional ethical requirements set forth in those same standards.

K-E-S Audit, a limited liability company providing auditing, bookkeeping, and tax consulting services, applies the Hungarian National Quality Management Standard No. 1 (ISQM 1) – "Quality Management for Firms Performing Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements," and accordingly maintain a comprehensive quality management system, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

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

### **Identification of Relevant Criteria**

The Group's management prepared the Consolidated Sustainability Report to comply with the requirements of Chapter VI/C of Act C of 2000 on Accounting (the "Accounting Act"), which implements Article 29(a) of Directive 2013/34/EU of the European Parliament and of the Council, , including:

- compliance with the European Sustainability Reporting Standards ("ESRS"), including that the double materiality assessment process (the "Process") applied by the Group to identify the information to be reported in the Consolidated Sustainability Report is consistent with ESRS 2 IRO-1 - Description of the procedure for identifying and assessing material impacts, risks, and opportunities ("ESRS 2 IRO-1"); and
- Compliance of the section titled "Environmental Information" in the Consolidated Sustainability Report with the reporting requirements set forth in Article 8 of EU Regulation 2020/852 ("Taxonomy Regulation").

hereinafter collectively referred to as: "Criteria".

### ***Inherent Limitations in the Preparation of the Consolidated Sustainability Report***

Information regarding non-financial performance involves more inherent limitations than financial information, given the nature of the subject matter and the methods used to identify, measure, sample, and estimate such information. The Criteria, the nature of sustainability reporting, and the lack of long-established guidance, customary applications, and reporting practices allow for the use of different but acceptable measurement methods, which may result in differences among organizations. The qualitative interpretation of relevance, materiality, and data accuracy depends on individual assumptions and judgments. Therefore, it is important that the information be interpreted in conjunction with the methodology applied by management and described in the Consolidated Sustainability Report, for which management is responsible. The measurement methods used may also affect the comparability of sustainability issues reported by different companies, as well as year-over-year comparisons for the Group, as the methodologies applied may vary.

The Group's management also interprets undefined legal and other terms that may be subject to differing interpretations, including their legal compliance, and may therefore involve uncertainty.

When reporting forward-looking information in accordance with ESRS, the Group's management is required to prepare such information based on publicly disclosed assumptions regarding future events and the Group's potential future actions. Actual results may differ, as future events often do not occur as expected.

### **Responsibilities of Management and Those Charged with Governance**

The Group's management is responsible for establishing, implementing, and maintaining processes that enable the preparation of the Consolidated Sustainability Report in accordance with the relevant Criteria, including compliance with the Accounting Act, the ESRS, and the Taxonomy Regulation, including the application of double materiality and relevant mandatory disclosures (ESRS IRO-1).

This responsibility includes:

- understanding the circumstances that define the Group's activities and business relationships, as well as identifying stakeholders and their needs as intended users of sustainability information;
- identifying actual and potential (whether negative or positive) impacts, risks, and opportunities that affect or are reasonably expected to affect the Group's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium, or long term;
- assessing the materiality of the impacts, risks, and opportunities identified in relation to sustainability topics by establishing and applying appropriate materiality thresholds; and
- developing assumptions that are reasonable under the circumstances.

The Group's management is also responsible for the preparation of the Consolidated Sustainability Report in accordance with Chapter VI/C of the Accounting Act—which implements Article 29(a) of Directive 2013/34/EU of the European Parliament and of the Council—including

- compliance with the ESRS,
- the preparation of the disclosures in the Consolidated Sustainability Report included in Appendix 1 of the Business Report in accordance with Article 8 of the Taxonomy Regulation;
- the maintenance of records relevant to the preparation of the Consolidated Sustainability Report, as well as the design, implementation, and application of internal controls to ensure that the Consolidated Sustainability Report is free from material misstatements, whether due to fraud or error; and
- selecting and applying appropriate sustainability reporting methods, as well as formulating and making reasonable assumptions and sound estimates, given the circumstances, with respect to individual sustainability disclosures.

The persons responsible for management accountable for overseeing the Group's sustainability reporting process.

## **The auditor's responsibilities in connection with an engagement to provide limited assurance**

Our responsibility is to plan and perform the limited assurance engagement to obtain limited assurance that the Consolidated Sustainability Report is free from material misstatements, whether due to fraud or error, and to draw a limited assurance conclusion. Misstatements may arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the Consolidated Sustainability Report as a whole.

The engagement was performed in accordance with ISA 3000 "Engagements for Assurance Services Other Than Audits or Reviews of Historical Financial Information," and we exercised professional judgment and maintained professional skepticism throughout the engagement.

Our responsibilities regarding the Consolidated Sustainability Report include the following with respect to the Process:

- understanding the Group's process for identifying the information to be included in the Consolidated Sustainability Report, but not for the purpose of drawing conclusions regarding the effectiveness of the Process, including the outcome of the Process;
- considering whether the identified information complies with the applicable disclosure requirements of the ESRS; and
- designing and performing procedures to assess the Process's consistency with the description of the dual materiality assessment published in ESRS 2 IRO-1 of the Consolidated Sustainability Report.

Our other tasks related to the Consolidated Sustainability Report include:

- Understanding the Group's control environment, processes, and information systems relevant to the preparation of the Consolidated Sustainability Report, but not for the purpose of drawing conclusions about the design, implementation, or effectiveness of individual controls;
- Identifying disclosures in which material misstatements are likely to occur, whether due to fraud or error;
- Designing and implementing procedures that adequately identify disclosures in which material misstatements are likely to occur. The risk of failing to detect a material misstatement resulting from fraud is greater than that resulting from error, as fraud may involve collusion, forgery, intentional omissions, false representations, or the override of controls.

## **Summary of the Work Performed**

A limited assurance engagement involves performing procedures to obtain evidence regarding sustainability information. The nature, timing, and extent of the procedures performed depend on our professional judgment, including the identification of disclosures in which there is a risk of material misstatement, whether due to fraud or error. The procedures performed include interviews, observation of processes, review of documents, evaluation of the appropriateness of

quantification methods and established reporting policies, analytical procedures, and reconciliation with underlying records.

In performing our limited assurance engagement, we carried out the following procedures regarding the Process:

- We obtained an understanding of the Process by:
  - conducting interviews with management, key personnel of the Group, and experts engaged by management;
  - we also reviewed internal documentation related to the Process in order to understand the sources of information used by management;
- we assessed whether the evidence obtained regarding the Process applied by the Group during our individual procedures is consistent with the disclosures in the Consolidated Sustainability Report regarding double materiality, as required by ESRS 2 IRO-1.
- *[If, in addition to the above, the auditor performed further procedures regarding the Process, a summary of which would help users of the Consolidated Sustainability Report understand the work performed that forms the basis of the auditor's conclusion, then it is recommended to explain this]*

As part of our engagement to provide limited assurance regarding the Consolidated Sustainability Report:

- Through interviews, we gained an understanding of the Group's reporting processes relevant to the preparation of the Consolidated Sustainability Report, including consolidation processes, by understanding the Group's control environment relevant to the preparation of the Consolidated Sustainability Report, processes, and information systems, but we did not evaluate the design of individual control activities, obtain evidence of their implementation, or test their operating effectiveness;
- We assessed whether the Consolidated Sustainability Report contains the material information identified during the Process, including its compliance;
- We assessed whether the structure and presentation of the Consolidated Sustainability Report comply with the ESRS requirements;
- We conducted interviews with stakeholders and performed analytical procedures regarding selected information included in the sustainability report;
- We performed substantive procedures regarding selected information in the Consolidated Sustainability Report.
- We verified consistency with the Group's consolidated financial statements as of December 31, 2025,
- We obtained evidence regarding the methods used to prepare significant estimates and forward-looking information, as well as how these methods were applied and what data and assumptions were used;
- We understood the process applied by the Group to identify economic activities that can be aligned with and are aligned to the taxonomy and to make appropriate disclosures in the Consolidated Sustainability Report, and we assessed whether the disclosures comply with the requirements of the Taxonomy Regulation;

## Other information

Section 134/L of the Act on Accounting requires us to provide a limited assurance conclusion on the compliance with the requirement to tag disclosures in the Sustainability Report—prepared in the electronic reporting format (XHTML) specified in Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation)—in accordance with the relevant ESEF taxonomy, including the disclosures required by Article 8 of Regulation (EU) 2020/852. Given that the ESEF taxonomy for sustainability reports has not yet been adopted, the Group—as presented in the "Consolidated Sustainability Report [ESRS 2 – General basis for preparation of the Sustainability Report]" section—was unable to perform the tagging of disclosures; therefore, we are unable to draw a conclusion in this regard.

Budapest, April 2, 2026.

Sugár Eszter Szilvia  
Managing Director

**K-E-S AUDIT Ltd.**

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MKVK nyilv. sz.: 001587

**Ujváriné Jónás Edit**

statutory auditor

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## Authentication Clause

I, the undersigned Eszter Szilvia Sugár, as the managing director of K-E-S AUDIT Kft. (Chamber of Hungarian Auditors registration number: 001587) authorized to issue audit clauses on behalf of the Company, hereby certify that this English language document is the English translation of the underlying Hungarian language independent auditor's report, which was electronically certified on April 2, 2026.

Eszter Szilvia Sugár

managing director

**K-E-S AUDIT Kft.**

1054 Budapest, Báthori u. 20. 3/1.a.

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