

**DUNA HOUSE
GROUP**

ESG REPORT – 2022

Duna House Holding Nyrt.



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Letter from the CEO

GRI 2-22

Dear Stakeholders,

We are honored to write the foreword to Duna House Group's first ESG Report. While we may not be considered a pioneer in ESG reporting, we are proud to say that our commitment to sustainability and responsible business practices has been at the forefront of our operations. As a company listed on the Budapest Stock Exchange, transparency has always been a key element of our way of doing business, while ESG focus is driven by both our shareholders and management as well as our external stakeholders. Client focus is at the center of our business – we strive to respect and provide fair services to every client of ours.

In the face of global instability and challenges in 2022, with the outbreak of the Russian-Ukrainian war and high inflation, it has never been more important for companies like ours to prioritize the well-being of our communities and the environment. This report is a testament to our dedication to these values and our efforts to bring greater transparency to our ESG initiatives.

At Duna House Group, we have made significant progress in advancing our sustainability initiatives, both centrally and locally, within our core operation and through our franchise network, and we are happy to share this progress with our stakeholders through this report. Our goal is to continue to strive towards a more sustainable future while providing easy-to-start business opportunities in real estate and consumer finance, and accessible housing financing to an even wider part of our communities. By creating formalized policies regarding information provision and communication, and partner selection in 2022, our applied practices have been reinforced and standardized.

Energy efficiency and operational costs have never been more important issues within the real-estate business than nowadays, and these will drive the industry towards more sustainable solutions, while on the other hand, higher interest rates and inflation might risk some new developments.

We are confident that this report will provide valuable insights into our ESG performance and serve as a stepping stone towards further improvements. We would like to express our sincere gratitude to all the employees, stakeholders, and partners who have contributed to this report and our business's sustainability.

Sincerely,

Gay Dymshiz and Doron Dymshiz

Co-CEOs

About the ESG Report

GRI 2-3, 2-5 This Report is the first ESG Report of the Duna House Group covering the 2022 financial year. The report is published on 6 May 2023. The report has been prepared in accordance with the GRI Standards 2021. The report is not 3rd party assured.

GRI 2-14 The management of Duna House was involved into the report preparation, from the determination of the material topics, through personal participation within the information collection processes till the approval of the report. The report was approved by the Board of Directors.

The report covers Duna House Holding Nyrt. and the IFRS consolidated subsidiaries of Duna House Group (DHG), with the following exception:

- the Czech operation – Duna House Franchise s.r.o., Duna House Hypoteky s.r.o., Center Reality s.r.o.

The report covers the Hgroup S.p.A, Credipass S.r.l. and Medioinsurance S.r.l. which also became part of the group in 2022. The Group Duna House held a majority share of 71.13% at the end of 2022, and 77.13% as of 26.01.2023. The full list of the companies can be found in the next chapter of the report. Duna House Holding intends to extend the coverage of its ESG report to be fully in line with its Annual Report from the reporting period of 2023 onwards.

To avoid duplication, we cite the Annual report, the Corporate governance declaration, and other public documents of the Group, when data required by the GRI Standards are already included.

The reporting cycle is annual, though we intend to present data for the former years in order to show tendencies.

To improve our performance in ESG and sustainability, any questions and comments are welcome at esg@dunahouse.com.

Highlights of Duna House Group



134,000 real estate buyer clients



63,800 real estate seller clients



66,600 financial product mediation clients



314 franchise real estate offices



23 own-managed real estate offices



3700 agents



110 financial institution partners



2700 energy efficiency certificates made



0 legal proceedings related to information provision and marketing communication



0 data privacy breaching



213 employees



26% part-time employees

Introduction of the Duna House Group and Governance

Activities of the Duna House Group

GRI 2-1, 2-6 Duna House Group holds a leading position in the service sector in Central and Eastern Europe. Its main activity is real estate and loan mediation, real estate agents and credit advisors assist customers in Hungary, Italy, Poland, and the Czech Republic.



The mission of the Group is: ***We serve people. Real estate is our passion.***

| Client numbers ¹ of Duna House Group | | | |
|---|---------------------|----------------------|-----------------------------|
| | Real estate - buyer | Real estate - seller | Financial product mediation |
| Total - 2022 | 134,000 | 63,800 | 66,600 |
| Hungary | 107,700 | 25,500 | 7,100 |
| Poland | 25,900 | 38,000 | 7,300 |
| Italy | 400 | 300 | 52,200 |
| Total - 2021 | 149,400 | 55,400 | 19,400 |
| Hungary | 108,000 | 25,800 | 7,900 |
| Poland | 41,400 | 29,600 | 11,500 |
| Italy ² | - | - | - |
| Total - 2020 | 112,800 | 56,600 | 13,500 |
| Hungary | 81,000 | 28,400 | 6,500 |
| Poland | 31,800 | 28,200 | 7,000 |
| Italy ² | - | - | - |

¹ Registered clients, who had a direct contact with a DHG representative.

² Not part of the DHG in 2021 and 2020.

Operation of franchise and own offices

The group operates real estate franchise networks in Hungary, Poland, Italy, and the Czech Republic. Both the group's own offices and franchise offices stay at the clients' disposal. The network primarily sells new and used residential real estate, and deals with the leasing of residential and commercial real estate.

| Real estate offices and agents of Duna House Group, 31.12.2022 | | | | |
|--|---------------------|-------------|---|------------|
| | Real estate offices | Own offices | Headcount in the real estate network ³ | Brands |
| Hungary | 162 | 14 | 1 689 | Duna House |
| Poland | 111 | 8 | 724 | Metrohouse |
| Italy | 41 | - | 79 | Realizza |
| Total ⁴ | 314 | 23 | 2 492 | |

Compared to 2021, the number of offices increased by 21% regarding franchise offices – Realizza was acquired in 2022 and 14 new branches have been opened in Poland. The number of own offices increased by 10%, with one new office in Hungary and another in Poland. To give a picture regarding the volumes, the value of properties sold with the support of Duna House Group, exceeded 10 billion HUF in Hungary.

Mediation of financial products

In order to provide comprehensive service to its clients, Duna House Group offers a wide range of financial products, primarily related to the purchase or sale of residential properties, in accordance with the multiple agency contracts concluded with credit institutions and insurance companies in Hungary, Poland, and Italy. Housing loans, home savings products, insurance, and other financial products are available in one place. Credipass worked with 61 financial partners in Italy, with 37 in Poland, and with 12 in Hungary in 2022. By revenue, the top5 significant partners were:

- in Hungary: OTP Bank Nyrt., K&H Bank Zrt., UniCredit Bank Hungary Zrt., Erste Bank Hungary Zrt., CIB Bank Zrt.
- in Poland: ING Bank Śląski S.A., Santander Bank Polska S.A., Bank Pekao S.A., Bank Millenium S.A., mBank S.A.
- in Italy: ING Bank N.V., CheBanca! S.p.A., Banca Monte dei Paschi di Siena S.p.A. (MPS), IBL Banca S.p.A., Credit Agricole S.A.

As a result of the successful acquisition of the Italian HGroup S.p.A., Duna House Group became the owner of the second-largest independent financial intermediary service provider in Italy, owning the brand Credipass. The Group has unified all its financial intermediary brands in October 2022, thus, Credipass is now available to customers in three countries: Italy, Poland, and Hungary. 211 experts served our clients in Hungary, 680 in Poland, and 758 in Italy at the end of 2022.

Related services

Duna House Holding provides a number of additional, real estate-related services to customers and partners. It performs energy certification services and provides real estate appraisal services to financial institutions and other market participants. Members of the group also carry out real estate management activities in both Hungary and Poland under the brand name Home Management for clients renting out their real estate.

³ Including franchise partners, office managers and agents

⁴ Without the Czech operation.

Member companies and their activities covered by the ESG Report are listed in the table.

| GRI 2-2 Company name | Main activities |
|--------------------------------------|--|
| Hungary | |
| Duna House Holding Nyrt. | holding company of the group |
| Duna House Biztosításközvetítő Kft. | insurance mediation |
| Credipass Kft. (Hitelcentrum Kft.) | financial mediation |
| DH Projekt Kft. | mediation of newly built properties, real estate of financial institutions, and real estate, that the debtor is unable to repay the loan for |
| Duna House Ingatlan Értékbecslő Kft. | real estate appraisal |
| Duna House Franchise Kft. | operation of the franchise network |
| Energetikai Tanúsítvány Kft. | energy certification |
| Superior Real Estate Kft. | operation of self-owned franchise offices |
| Home Management Kft. | encompassing management service of residential properties |
| REIF 2000 Kft. | franchise partner of Duna House |
| GDD Commercial Kft. | sales, purchasing and leasing of self-owned real estate with a business function |
| SMART Ingatlan Kft. | real estate brokerage |
| Impact Alapkezelő Zrt. | real estate investment fund from properties in Hungary |
| Home Line Center Kft. | sales, purchasing and leasing of self-owned real estate with a residential function |
| Akadémia Plusz 2.0 Kft. | training activities related to real estate brokerage |
| Duna House Szolgáltatóközpont Kft. | central services to subsidiaries |
| MyCity Residential Development Kft. | real estate development projects |
| Pusztakúti 12. Kft. | construction and sales of residential parks |
| Reviczky 6-10. Kft. | construction and sales of residential parks |
| MyCity Panoráma Kft. | development of MyCity Panorama project |
| Poland | |
| Metrohouse S.A. | real estate mediation |
| Metrohouse Franchise S.A. | operating own and franchise offices |
| Credipass Sp. z o.o | credit intermediary |
| Primse.com Sp. z o.o. | sales service for real estate developers |
| Credipass S.A. | credit intermediary |
| Italy | |
| HGroup S.p.A. | financial product brokerage |
| Credipass S.r.l. | financial product brokerage: mortgage loans and a special loan product, CQS |
| Medioninsurance S.r.l. | insurance mediation |

For further information regarding the Group’s activity visit www.dunahouse.com and the Annual Report.

Governance structure

GRI 2-9 The company is managed by the Board of Directors. The Board of Directors is responsible for making decisions on all matters that do not fall under the exclusive jurisdiction of the General Meeting. Among others, the Board of Directors makes decisions on the annual and medium-term plans.

Following the dual management structure, the Supervisory Board carries out supervision of the Company's management and business.

The members of the Board of Directors and the Supervisory Board are elected by the General Meeting.

The operational management manages the affairs within the framework defined by the legislation, the Articles of Association, the rules of procedure of the Board of Directors, the resolutions of the General Assembly and the Board of Directors, with individual responsibility.

GRI 2-9, 2-11 The Company does not expect independence from the members of the Board of Directors. Duna House Group has two Co-Chief Executive Officers, and the president of the Board is one of the Co-CEOs. One member (20%) of the Board of Directors is independent – not an executive of the Duna House Holding or its subsidiaries. All members of the Supervisory Board are independent. None of the CEOs is the president of the Supervisory Board. The average tenure of the Board of Directors is 5.8 years, and of the Supervisory Board is 5.6 years at the end of 2022. Members of both governance body members are elected annually, with the exception of Gay Dymschiz and Doron Dymschiz, founders, Co-CEOs and main shareholders of Duna House Holding. All members of the highest governance bodies are male. CVs and competencies of the members are available at the website of Duna House Group: <https://dunahouse.com/en/board-of-directors>.

The Company's Statutes make it possible for the Board members to fill executive and supervisory board positions in business entities whose main economic activity is identical to that of the Company. The primary reason for this is the circumstance that the Company is a member of the Duna House Group within which there are further business organisations whose principal business activities are the same as those pursued by the Company. Independent members of the Board of Directors and Supervisory Board hold significant positions outside the Duna House Group as senior managers or members of the Board of Directors or Supervisory Board.

GRI 2-18 Every year, the annual ordinary General Meeting includes in its agenda the evaluation of the work performed by the Board of Directors in the previous business year and decides on the indemnification to be granted to the Board.

The only committee of the highest governance bodies is the Audit Committee. The Committee supports the work of the Company's Supervisory Board and performs review, evaluation, and proposal functions. The Committee consists of three members, who are elected by the General Meeting from the members of the Supervisory Board. The Audit Committee has the same members as the Supervisory Board.

GRI 2-15 The highest governance body has processes in place to prevent and mitigate conflicts of interest. All directors report related parties and potential conflicts of interest to the Supervisory Board, which then makes decisions to prevent or mitigate these conflicts. No cross-board membership and cross-shareholding with suppliers and other stakeholders occur at Duna House Holding. Related party transactions are reported in chapter 13 and 28 of the Annual Report.

The ownership structure of the Company is detailed in the Annual Report.

Nomination processes

GRI 2-10 The nomination process for the highest governance bodies and committees involves the consultation of multiple stakeholders, including relevant shareholders. Stakeholder views are considered, and input is sought on potential candidates. Members of the highest governance bodies can nominate. Diversity is a key consideration in the process, with a focus on selecting candidates with a range of perspectives and backgrounds. Competencies and experience relevant to the organization's impacts are also evaluated. The final selection is based on a thorough review of candidate information to ensure the highest governance body has the necessary skills and experience to govern effectively.

In the current Supervisory Board, two out of three members obtained their mandate before the IPO (initial public offering) of the company, in 2016. They were selected after consulting with potential institutional investors taking into account their views.

Role of the highest governance bodies related to sustainable strategy

GRI 2-12 The Board of Directors and Senior Executives play a critical role in the development, approval, and updating of the organization's purpose, values, mission statements, strategies, policies, and goals related to sustainable development.

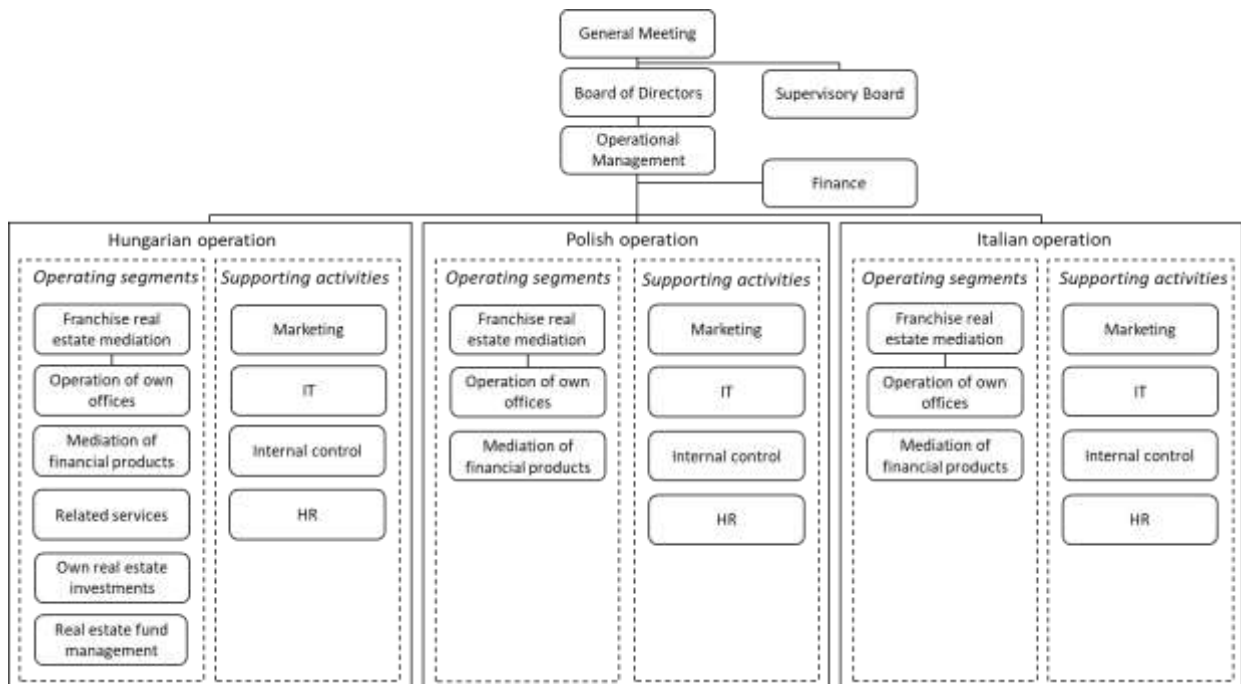
The Board of Directors is responsible for setting the overall direction and tone for the organization with regard to sustainable development. This includes developing and approving the organization's purpose, values, and mission statements, which serve as a foundation for all of the organization's activities and decisions.

Senior executives, in collaboration with the board of Directors, are responsible for developing and implementing strategies and policies. This includes setting specific, measurable, achievable, relevant, and time-bound (SMART) goals related to sustainable development, as well as regularly monitoring progress towards these goals and updating them as necessary.

By working together, the Board of Directors and senior executives ensure that the organization's actions and decisions are aligned with its commitment to sustainable development and contribute to the achievement of a more sustainable future. Executives also encourage independent sustainability initiatives at various levels of the organization including the franchise network and HQ team.

The Board of Directors oversees the due diligence processes to identify and manage the organization's impacts on the economy, environment, and society. The body engages with stakeholders and considers the outcomes of these processes to make informed decisions and provide direction to senior executives. The board of directors plays a key role in promoting sustainable development even in an informal process.

GRI 2-13 Currently, there is no formally appointed executive with the responsibility of managing impacts on sustainability at a group level, however, the issue and ESG domains are governed on a country level. Internal control and HR functions are responsible for human resources and compliance; impacts related to the core business, are managed by the operative segments; corporate marketing is implemented by the marketing department.



Critical concerns

GRI 2-16 Critical concerns are communicated to the Board Directors and the Supervisory Board by the Chief Financial Officer or other involved directors. No critical concern occurred or was communicated to the highest governance bodies in 2022.

Values of Duna House Group and Code of Ethics

GRI 2-23, 2-24 We adhere to five core guiding values to achieve our goals, fulfil our mission, and serve our clients on the highest level.

Our values are:

1. **Fairness:** We work by human and business ethical standards both in our internal and external relations; we provide predictable, consistent operation.
2. **Being customer-driven:** We aim to provide services of maximal satisfaction to all our clients.
3. **Synergy:** We organize our activities focusing on the interaction of strengths supporting each other.
4. **Growth, development:** Serving sustainability, we are in constant development to be always a step ahead of other players.
5. **Being results-oriented:** In line with corporate values we manage tasks and achieve goals by applying the most efficient method.

Duna House Group respects and is committed to act in line with the 10 principles of UN Global Compact. We integrate responsibility to people and planet into our everyday operation.

In line with our core values Duna House Group has created its Code of Ethics in 2022, which is also available on the website: <https://dunahouse.com/en/our-mission-values>. The Code was approved by the co-CEOs of the Group and will be communicated to the employees and agents in 2023. The guidelines outlined in the Code of Ethics are mandatory for all individuals who represent or act on behalf of Duna House, including headquarter employees, loan brokers and real estate agents, and franchise partners. At the same time, the Code declares that franchise and sub-franchise partners (agents) of Duna House Group conduct their activities as independent legal entities and are responsible for their own actions. Executive managers and middle-managers ensure that all employees and partners adhere to the rules.

Individuals who work within the Duna House Group must act respectfully and ethically with all those they come into contact with in the course of their work. They must conduct their activities in the spirit of mutual cooperation, ensuring that they are in compliance with all relevant laws and regulations. Discrimination of any kind, particularly based on religion, skin colour, gender, sexual orientation, political affiliation, age, nationality, or disability, is strictly prohibited. Duna House does not tolerate any form of corruption, including bribery or any other illegal or unethical conduct. All employees must maintain the confidentiality of sensitive information and protect the privacy of clients and business partners.

Besides the general guidelines, special expectations are set for employees, loan brokers, franchise partners, and real estate agents. Loan brokers, franchise partners, and real estate agents must provide transparent and accurate information about real estate properties and services to clients, and must not engage in deceptive or misleading practices.

In case of any doubt, employees, franchise partners and agents can consult their direct manager, the HR departments, and the internal control departments to seek advice regarding the implementation of the Code.

GRI 2-25, 2-26 Every person, who is required to act in line with the Code of Conduct, must report any violation of the Code of Ethics to the internal audit department. Besides, managers also report any

kind of misconduct to the internal auditor function. Reporting concerns or breaches of the Code can be reported by external stakeholders. In Italy, a whistleblowing system has been established.

Stakeholders, organizational memberships

GRI 2-29 Duna House Group has a wide range of stakeholders. The Company has identified its stakeholders by considering business relations and the impacts of the activities of the company. The Group engages with all of the stakeholder groups in line with the principle of ethical business conduct. The purpose and characteristics of stakeholder engagement are summarized in the following table by stakeholder categories. Duna House Group is open to feedback from every stakeholder group, thus our intention is to ensure and provide a platform for two-way communication.

| Stakeholder group | Purpose of engagement | Characteristics of engagement |
|--------------------------------------|--|--|
| shareholders | satisfying the expectations | General Meetings, reporting, quarterly meetings |
| stock exchange, analysts | providing information and feedback for objective analysis | quarterly meetings, receiving analysis |
| clients | increasing satisfaction and commitment, enhancing financial education | measuring NPS (net promoter score) regularly, evaluation system of salespersons, customer complaints handling, deep provision of information while serving the clients, articles regarding financial topics |
| employees | motivation, retention of talented employees | quarterly performance evaluation in Hungary, continuous and direct feedback due to the flat organisational structure |
| banking partners | receptiveness | frequent consultations with partners |
| franchise partners | close cooperation, loyalty | formal, annual feedback regarding the support system, HR support |
| franchise partner employees | ensuring a stable agent basis | possibility of feedback towards the HQ, wide variety of professional trainings |
| subsidiaries | effective, fair cooperation, communication within franchise area | meetings in every two weeks with the HQ management, monthly management meetings with the country managers, thematic knowledge sharing 2-4 occasions per year |
| suppliers | effective, fair cooperation | support based on needs |
| authorities | compliance with the legal requirements, lobbying regarding the Hungarian legislation to adopt Western European practices | compulsory data provision to tax authorities on a daily and weekly basis, staying at disposal in case of a regulatory inspection, data provision to the residential real estate advisory board of the ministry in Hungary, constructive participation in the investigations of the prosecutor's office regarding contracts and product constructions |
| advocacy, professional organisations | advocacy, knowledge sharing | cooperation |
| supported organisations | supporting local community | regular support of organisations |
| ESG rating companies | good ESG rating | quick response, cooperative attitude |
| media | brand building | frequent and active PR communication, publishing barometer analysis regarding the real estate market, professional articles, hundreds of appearances in a month |

GRI 2-28 Duna House Group considers the following organizational memberships significant:

- In Hungary:
 - o Association of Independent Financial Product Intermediaries: deputy CEO of Duna House Group is the president of the Association;
 - o Hungarian Franchise Association;
 - o International Franchise Association.
- In Poland:
 - o Association of Independent Financial Intermediaries;
 - o The Association of Financial Companies in Poland;
 - o Polish Franchise Organization.

Materiality Analysis

GRI 3-1, 3-2 Duna House Holding has identified the most important sustainability topics during the preparation phase for its ESG reporting. The basic principle of the analysis was to determine the topics that represent the most significant impacts of the company on the economy, the environment, and society. The analysis was conducted by an external consultant.

An online survey was conducted among the main stakeholder groups of Duna House Group. Representatives of the following stakeholder groups were invited:

- shareholders,
- stock exchange/stock market analysts,
- professional organizations, market analysts,
- supervisory authorities,
- sustainability organizations (i.e., consumer protection, environmental protection), universities,
- banking partners,
- Duna House employees,
- franchise partners,
- franchise partners' employees,
- suppliers,
- media (journalists),
- supported organisations.

48 respondents expressed opinions from all the abovementioned groups with the exception of supervisory authorities. The questionnaire was completed by stakeholders from Hungary, Poland, and Italy. The potentially relevant topics were identified at two levels, respondents evaluated 8 overarching topics and almost 40 sub-topics.

The topics were defined on the basis of the general topics of the GRI Standards 2021, the sector-specific indicators of the SASB (Sustainability Accounting Standards Board), sectorial benchmarks, and considering the impacts of the company group's activities. The staff of Duna House Holding were involved in the finalization of the topics.

Findings of the evaluation:

- Sustainability is considered to be decisive by all the groups involved. For franchise partners and banking partners sustainability is the least important, though more than 80% of them said that it is decisive.
- In general, respondents consider strengthening health and education as the most important issue (this is typically confirmed by all similar researches), with climate change mitigation in the third place.
- Stakeholders expect Duna House to focus on addressing decent employment, development of the economy, enterprises, and education, followed by the topic of access to housing, and the provision of housing.
- Out of the 8 overarching sustainability themes, the following 4 were considered the most significant:
 - o responsible sales,
 - o responsible employment,
 - o responsibility related to franchise partners and,
 - o responsibility concerning supply chain and banking partners.

The results of the evaluation were reviewed by the consultant and Duna House, searching for topics not appropriately emphasized concerning the extent, positive or negative direction, and severity.

Based on these inputs, topics with an average value of at least 4 out of 5 are relevant from a sustainability point of view, supplemented with two more topics as a consequence of Duna House Group’s current and potential impact.

Therefore, the material sustainability topics of Duna House Holding are based on the company's impact and the stakeholder assessment.



Responsible Sales

GRI 3-3 We take particular care of every aspect of sales in order to meet our clients' expectations, their legitimate interests, and to sell our products and services only to those who are able to make use of them. Our commitment to responsible communication and transparent information is at the forefront of our business strategy. To enhance our commitment, we created a group-level Responsible Communication and Information Policy in 2022. We understand the significance of effective and responsible communication and the impact it has on our customers, stakeholders, and the general public. We ensure that all employees adhere to the Policy. We are committed to responsible communication in all aspects of our business, including real estate, loan, and insurance products, and corporate marketing. We aim to provide accurate and honest information to our customers and stakeholders and ensure that we act with professionalism, integrity, and impartiality at all times.

Besides the Group Code of Ethics, a separate Code of Ethics applies to the agents of the Hungarian network. The latter Code details the expectations. Agents must strive to meet the client's needs – within the framework of business ethics – to a large extent, communication must be clear, full, and objective (detailed below). Acting at the highest level of standard towards the clients with the same professionalism and quality of service without exception is obligatory. It is forbidden to abuse economic dominant position, i.e., it is prohibited to stipulate an unjustified unilateral advantage or to force the client to accept disadvantageous conditions. Agents must provide the greatest care and maximum security regarding the properties and goods entrusted to them. Clients need to be informed if at any party of the transaction a relationship exists that can influence the outcome of the transaction (e.g., family, friendship, business or other relationship).

Responsible information management and transparent products

GRI 3-3 We are committed to responsible information management both in the case of our real estate and loan services. Our main objectives are to:

- provide all the information needed for a responsible decision in a transparent, clear, and comparable way,
- adjust the offer to the individual needs of the client,
- avoid the sale of mismatched products, and
- provide reliable information about costs and possible additional requirements of the banks.

We implement practices to ensure that our clients have a clear understanding of their choices among products serving the same or similar needs, they can understand the differences and they are also able to understand the conditions and risks of the products. According to a former (2020), representative research in Hungary the most positive characteristic of Duna House was helpfulness and competence among the respondents who were in contact with the real estate mediation service of the Company. Among the most important attributes of an agent are several related to information provision: to be well-informed, to be a good communicator, and to provide up-to-date information.

Principles are implemented in different ways across the Duna House Group complying with the local legislative requirements and products. We are convinced that information provided to our clients on the occasions of personal meetings has an essential role in understanding the characteristics of the products and services, and in enabling our clients to make the right decision. Our agents place a great emphasis to explain the services thoroughly, answer every arising question and make clear the differences between possible choices. Information handed over to clients according to legal

requirements makes it, in many cases and for many clients, hard to have overall understanding; our agents provide assistance here as well.

In Hungary, the Code of Ethics for agents declares that exaggerations and misleading statements must be avoided in communication, and information must always be objective. Facts of a given transaction cannot be hidden from clients and false information about the matter cannot be given to any of the parties involved. Agents are also obliged to provide information to customers about all hidden defects they are aware of. Advertisements written by our agents must be true, fair, and accurate in accordance with legal regulations; they can only be based on information received from the clients.

Legal requirements are strict – especially regarding loan products – in all countries of our operation, and expect detailed information on the products, including comparability of different products. The group adheres to the guidelines of banks regarding information provision. All the information needed is included in the agreements, in other documents, and on the websites of Duna House Group.

In Italy, Credipass shares all product information in the “trasparenza” (transparency) section of its website and updates it daily, as suggested by the Organization of Agents and Mediators (Organismo degli Agenti e dei Mediatori) and regulations of the National Bank of Italy (Banca d’Italia) on transparency in banking and financial services and operations between clients and intermediaries. Furthermore, an advertising column has long been in use in commercial offices.

The Italian Credipass has also created a special policy to comply with transparency requirements and correct information provision of the legislation, included in the Process Manual. The internal Product Governance procedure covers transparency of products as well. The company implemented specific procedures supported by an internal management platform. It includes proof of delivery of the brokerage contract to the client, the anticipated brokerage costs, and product information management. Credipass has been using advanced electronic signatures since 2020 to ensure that clients receive sufficient information. It is a tool for digital signature that needs an active email and a telephone number to work. After the contract is signed by the client, a copy is sent to their email address.

In Poland, we provide clients with an intermediary information card, summarising the information regarding the Company, entities we cooperate with, available products and also the insurer and the insurance number.

A wide range of trainings is provided groupwide to franchise partners and agents in order to ensure the highest quality service. Trainings cover information provision as well, aiming both to comply with the legal requirements and being able to present the offers in a clear and transparent way.

Evaluation of appropriate information management

Duna House Group applies different methods to control and track appropriate services provision and evaluation of information management is part of these processes. Managers supervise and ensure the quality of services. In Hungary and Poland, we also use mystery shoppers to ensure that agents are acting according to responsible information provision requirements. In Italy, information handling is tracked with a so-called welcome call from the Middle Office, which verifies if the client received all the needed information in an appropriate way and is satisfied with the agent’s behaviour.

We use an evaluation system to rate the performance of salespersons in Hungary (regarding financial intermediary services the system was suspended in some part of 2022) and in Poland for real estate services. After every major event (e.g., showing, listing) and the closure of a transaction automatic evaluation letters are sent to clients, who can give an overall rating and can have a comment. The

results are publicly available on our local homepages. We receive around 10,000 feedbacks a month in Hungary. Measuring NPS (net promoter score) makes a deeper analysis of performance possible, thus we are planning to broaden its usage in Hungary in 2023.

Portfolio effectiveness is checked with agents, managers, and franchise partners. Also, problems which might arise related to the product portfolio such as transparency and difficulties in understanding could be discovered and handled through this process.

We track complaints regarding information provision and product transparency/clearance, please find the data in the Compliance chapter.

Enhancing customers' financial literacy

GRI 3-3 We are convinced that our agents have an important role in the development of our clients' financial education and knowledge. We offer free consultation services to our clients. We assist with the accurate interpretation of bank documents and our qualified loan specialists help customers navigate the details. Enabling clients to understand how financial products work is one of the most important duties of the agents.

Besides the consultancy provided to the clients, we provide articles and educational videos about the most important financial products and actual financial-related information. In Hungary, these contents are available on our home page's site (IngatlanOkos), Youtube channel, and other social media platforms. In 2022 the articles were about CSOK (Family Housing Allowance Scheme), mortgages, governmental subsidies, and increases in cost of energy. The 11 articles published in 2022 were visited on 7600 occasions. In Poland, financial awareness contents are also available on the websites of Credipass and Metrohouse. Articles can be found about credit scoring, impacts of interest rate changes, differences between mortgage and cash loans, safe rentals, etc.

Responsible marketing communication

GRI 3-3 Our Responsible Communication and Information Policy covers marketing communication as well. We are committed to ensuring that our advertising and marketing materials, including real estate adverts, information on loan and insurance products, and corporate marketing are accurate, truthful, and not misleading. Our marketing materials clearly state all relevant information and include any necessary disclaimers to prevent any misunderstandings.

Marketing communication is focusing on brand building, thus mainly general information is communicated.

The Polish Metrohouse has detailed principles and processes regarding marketing communication, as the followings:

In accordance with the principles of fair competition and good commercial practices, a marketing message supporting the sales and promotion of Metrohouse brands:

- is clearly marked as an advertising message (e.g., sponsored text, sponsorship campaigns on radio and TV),
- is prepared with an appropriate sense of social responsibility,
- is prepared in accordance with the principles of ethics in a way that does not violate human dignity and rights in any way,
- takes into account the diversity and local sensitivity with regard to cultural values, race, sexual orientation, gender, gender, religion,
- does not refer to, comment on, or compare activities presented by competing companies,
- takes into account the different recipients of the message, therefore the issue of the message is communicated in a manner accessible to a wide group of recipients,
- provides reliable information on both brands from the Metrohouse group and the market environment, each time providing the source of information,

- the content of the message does not contain topics, images, symbols that may be illegal, or are considered degrading or discrediting,
- in the case of information based partly on the transfer of third parties (e.g., descriptions of real estate offers), each time the following information is added: "Although Metrohouse Advisors pay special attention to the reliable presentation of information about the property, it is not always possible to verify all data provided from third parties."

The marketing and public relations director of the Metrohouse group is the member of the Polish Public Relations Association. Thus, he is obliged to comply with the Association's [Code of Ethics](#).

Marketing communication planning includes internal consultations within the department to define possible negative effects of the communication activities. The verification process ensures that the activity will not violate the general principles of fair competition and good commercial practices. Our decisions to implement specific elements of marketing communication are made through discussion and approval of all members of the marketing department and associates involved in the project. Marketing activities are subject to constant monitoring, both through the Internet and the traditional press. Compliance of marketing communication with the interests of customers consists of constant content monitoring through external, independent monitoring systems; analysis of the activities carried out and cyclical adaptation of the communicated message to the changing market situation and the Company's goals; making decisions about marketing communication (marketing campaigns) based on the discussion of the marketing and sales team; analysis and reaction to emerging comments regarding broadly understood marketing activities.

In Hungary, customer communication and real estate advertisements are regulated by our Manual which ensures that only truthful and accurate information is provided to the clients about real estate. The information given about financial products is regulated and controlled by the Hungarian National Bank (MNB).

In Italy, external communication activities are outsourced, while it is required to comply with the abovementioned principles and the legislation, and the Marketing Department decides on the involvement of other suppliers in this field.

Management of clients' complaints

GRI 3-3 Handling client complaints regarding sales practices, information provision, and marketing communication is the same as other types of complaints (please see in Franchise Partners and Agents chapter).

In Poland, in case of violations regarding marketing activities, the company's Board of Directors, the Control Department and the Sales Department are notified to collectively analyze the situation and take appropriate steps to mitigate the consequences of irresponsible communication.

We track the complaints related to information provision and product transparency/clearance (please see in Ch. Compliance), and aim to improve our practices to decrease the number of complaints.

There have been no closed legal proceedings regarding marketing communication and information provision in the last 3 years at any location of Duna House Group.

Partner selection

Duna House Group offers a wide range of loan and financial product portfolio, making the countries' real estate-related financial products available for its clients.

In 2022 we formalized the practice of partner selection we had been applying before, and created the Group's Partner Selection Guidelines.

Duna House Group is committed to selecting partners that align with our values and principles. We believe in creating mutually beneficial, long-lasting relationships with partners who share our passion for excellence, integrity, and responsible business practices.

Selection criteria of financial institution partners (bank, insurance companies):

- Financial Stability: providers of mediated financial products must have a strong financial position and reputation.
- Licensing: providers must hold the necessary local and EU banking or insurance licenses.
- Interest rates: Duna House Group will not work with financial institutions that offer exploitative or predatory interest rates.

The head of the department is responsible for the selection of financial institution partners. When selecting our partners, we take into consideration that banks and insurers are strictly regulated and controlled in all countries of our operation.

Selection Criteria of Franchise Partners:

- Local Entrepreneurs/Real Estate Agents: We strive to recruit partners and agents who have the potential to give the highest possible level of service to our clients.
- Adherence to Corporate Code of Ethics: Our franchise partners must adhere to our corporate code of ethics and conduct business with integrity, professionalism, and responsibility.

Further information regarding our cooperation with franchise partners can be found in Franchise Partners and Agents chapter.

Franchise Partners and Agents

Franchise system and agents at Duna House Group

GRI 3-3 Duna House Group's operation, which was introduced in 2003, is based on a franchise business model regarding real estate and loan mediation services. At the same time, Duna House Group operates real estate offices in the countries of operation on its own. The franchise partners are independent companies that have a contractual relationship with Duna House Group and are members of the Duna House franchise network. Based on this contract the Partners operate an office. Sub-franchise partners are independent companies/self-employed persons working as agents, contracted by the franchise partner. Financial mediators are working in various ways, in many cases not connected to an office. In Poland, financial mediator agents were also employed part-timely by Duna House Group till 30.11.2022. Since 01.12.2022 agents work with a civil contract. Franchise partners are essential for the group and are considered key players in the group's effective and successful operation.

The franchise model is an efficient business model. The involvement of partners and agents is contributing to ensuring the Group's rapid growth in market coverage and outreach to potential clients. Through the unified brand, infrastructure, and know-how the provision of high-quality service is also guaranteed.

Expectations towards franchise partners and agents

GRI 3-3 Duna House Group provides the frameworks for its franchise partners' operation through a formalised system, shared know-how, unified brand image, support in sales, marketing, IT, education, training and other areas of operation aiming to ensure the provision of high-level service. The franchise contract regulates the business and operations of franchisees and obliges them to comply with several standards of operational procedures and appearance. The franchise brand is provided for partners for an entry fee and monthly franchise fee. The detailed standards are further defined in the franchise manual. Franchise partnerships are handled under continuous supervision. Therefore, franchise forums, group and individual meetings, and sales support are provided aiming to ensure that the franchise partner's operation is in line with the Group's standards and expectations, while interests of the clients and society are also considered.

The franchisees' and sub-franchise partners' work is also guided by the Duna House Group's Code of Ethics (see in Ch. Introduction of the Duna House Group and Governance) and a separate Code of Ethics applies to the agents of the Hungarian network (detailed in Ch. Responsible Sales).

Compliance with the requirements is controlled in every aspect. In case of a complaint regarding the behaviour of an agent, the Internal Control and Compliant Handling Departments are starting an investigation and eliminate non-ethical behaviour as soon as possible. Internal control departments are involved if needed. Inspection may make use of methods of mystery shopping or private investigators, fully in accordance with the legal possibilities. In case of a verified breach, claim procedures are initiated according to the brokerage agreement by the Internal Control or Claim Department. As a consequence of unethical behaviour, franchise partners may be required to pay compensations; in more severe cases contracts may be terminated and court cases may be initiated. The terms and conditions of these procedures are clearly defined by the brokerage contracts. In 2022 no significant breach of the requirements has been identified.

Responsibility towards franchise partners and agents

GRI 3-3 While requiring compliance of strict rules on one side, we are providing a supportive, predictable environment on the other. Duna House Group provides easy-to-start business opportunities through the franchise partner system and flexible employment possibilities to sub-franchise partners and agents. Agents can work according to their ambitions with a firm background

and support of Duna House Group. Agent jobs provide a good opportunity to achieve work-life balance and fulfil one’s family or personal duties. In many cases, persons with worse options in the regular employee market (e.g., women with small children, pensioners) may work as a mediator, or an agent job may serve as a second job, supporting a higher standard of living.

Duna House Group takes responsibility for its agents and their income options. In the middle of 2022, the favourable and popular tax-paying option (KATA) in Hungary, was significantly modified. As agents serve private individuals, we have changed our commission system, to make our sub-franchise partners able to use KATA further.

Within the franchise network – just as for its employees –Duna House Group aims to create equitable and inclusive working environments. Franchise partners are encouraged to provide opportunities for self-development, trainings, career-advancement, and knowledge exchange events for the agents, while creating fair working conditions for the agents of the network, too. Agents are provided with the same support as employees regarding professional issues. We are committed to close cooperation and an open feedback culture with our network. Duna House Group applies the same principles and rules for all franchise partners and agents and provides equal opportunities without discrimination in the countries of operation. At the same time regional differences are applied in commissions, taking into consideration business opportunities, and preferential conditions may also be given.

As a tradition, we organise Christmas Decoration Competition in the real estate offices with many participants in Hungary and Poland as well. The competition helps to prepare for the holiday season both for our colleagues and clients and provides a good occasion for creativity.

Numbers of the network

GRI 203-2, 2-7 – network The Duna House Group’s real estate network is the largest in the region. A total of 4141 people work within the real estate or financial mediator network of the Group. In Poland, the number of franchise partners increased by 20% in 2022, due to strong franchise activities. The group contracts franchise partners for a definitive period between 2 to 5 years, while sub-franchise partners (agents) are contracted for an indefinite term.

| GRI 2-7 – network Geographical breakdown of franchise partners and agents, 31.12.2022 | | | | |
|---|-------------|-------------|------------|------------------|
| | Hungary | Poland | Italy | Duna House Group |
| Franchise partner | 157 | 106 | - | 263 |
| Office Manager | 171 | 17 | - | 188 |
| Agent | 1572 | 1281 | 837 | 3690 |
| Total headcount | 1900 | 1404 | 837 | 4141 |

GRI 401-1 – network The fluctuation rates within the network were similar in 2022 to the previous years both in Hungary and Poland. Higher turnover is more typical among agents than among office managers and franchise partners. Duna House Group is aiming to provide favourable conditions to increase the retention rate of its network as higher rates of fluctuation may have negative effects on business results as well. However, increased fluctuation is typical within the real-estate sector as flexible conditions allow easy entering and exiting of agents. As a higher exit rate is especially typical within the first 6 months of cooperation, we enhance our training system and apply a mentoring system, while we encourage our office managers to give bigger priority to onboarding.

| GRI 401-1 – network New hires and turnover among agents by region, 12.31. 2022 | | | | |
|--|------------|------------|------------|------------------|
| | Hungary | Poland | Italy | Duna House Group |
| Total number of newly hired persons | 852 | 759 | 200 | 1 811 |
| Rate of new hires | 54% | 59% | 24% | 44% |
| Employees left the company | 845 | 989 | 335 | 2 169 |
| Turnover rate | 54% | 77% | 40% | 52% |

Training and Education

GRI 404-1 – network New agents are required to fulfil the introduction programme to ensure seamless integration to the network. Besides, we support every agent to obtain the necessary knowledge through coaching.

The Group offers a wide range of training (Academy) focusing on professional and managerial knowledge and development. Trainings for agents cover many aspects of sales from contacting clients, through psychological knowledge, to product characteristics. Online trainings, webinars and workshops are provided for free, and available for everybody equally. Personal trainings are available for a reduced fee compared to market prices. Participants have the opportunity of providing feedback on trainings and training is evaluated through an annual survey conducted by the network. Duna House Group’s success vastly depends on the ability to select the appropriate franchise partners; therefore, we give priority to retaining, supporting and motivating our franchise partners through education and training as well. Managerial trainings aim franchise partners. Financial mediators are trained in most of the cases by the bank/insurance partners, and these trainings are not included into the table below. In Hungary the average is calculated without loan mediator agents, as their trainings are held exclusively by the bank/insurance partners.

In Hungary, a 2-day long training conference is held annually where 80-90% of the network takes part. In Poland, the Franchise Workshop creates an excellent opportunity to learn about current affairs and to deepen relationships.

| GRI 404-1 – network Training hours within the networks, 31.12.2022 | | | | |
|--|---------|--------|-------|------------------|
| | Hungary | Poland | Italy | Duna House Group |
| Average training hours per worker | 32.28 | 13.35 | 4.04 | 19.50 |

Feedback within the franchise network

GRI 3-3 Supporting the aim of building a close relationship and cooperation with franchise partners, direct feedback is given to franchise partners regularly, and open discussions are encouraged to ensure that issues and problems are properly addressed. Supervision and feedback are provided by franchise forums, regular group meetings within the network and individual meetings.

Franchise partners are also requested to assess the Group’s performance; a survey is filled out by partners annually both in Hungary and Poland. Besides a general outlook, departments of the head office’s performance are appraised on a scale from 1 to 10. Based on the Hungarian franchise partners’ survey, loyalty is high towards the Group. The majority of the partners (84%) would lengthen their contract as of today, though partner’s satisfaction was moderate with their business result (6.26/10). Regarding the evaluation of the HQ departments’ support, the support of Marketing, HR and Franchise departments was rated the highest, highlighting the quality and usefulness of centrally organised

events (9.19/10) and the provided PR materials in regard of quality and quantity (9.16/10). Besides the preparedness of the trainers on trainings and the usefulness of franchise offices' internal controls were also rated high (8.91/10). The lowest average ratings were given to the IT Department (7.67/10) and the Sales Department (7.98/10).

The franchise partner survey in Poland was evaluating the Group's performance on a 1 to 5 scale. Low satisfaction was expressed by partners on their business results and profitability (2.47/5). However, the majority of the franchise partners (79%) would prolong their contract. The overall performance of the Credipass (financial advisory) division (3.97), the Training Department (3.97) and Marketing Department (3.71/5) was rated the highest. The lowest average ratings were given to the Sales (3.14/5) and IT Department (3.44/5).

Agents can also provide feedback to Duna House Group, though there is no formalized and regular channel yet. We have started to establish a system for feedback.

Compliance within the franchise network

GRI 2-27, 417-2, 417-3, 206-1 – network In 2022 there were no closed legal proceedings initiated by authorities related to the franchise partners. Duna House Group provides support for its franchise partners in case of legal proceedings, should it be a court case, a prosecutor's office's proceeding, or other authority-initiated cases. We encourage our partners to involve the Headquarter in the early phase of a proceeding, especially if a general practice of the Group is the subject of the proceeding; we are more prepared to provide information, reason our practice, and represent the interests of the Group.

Direct and Indirect Economic Impacts

Duna House Group has several different economic impacts. Direct impacts are related to the company's direct stakeholders and activity, and in case of indirect impacts, there is an intermediary. The table shows the distributed economic value with payments to individual stakeholder groups.

| GRI 201-1 Direct economic value generated and distributed, million HUF 2022 ⁵ | |
|--|---------------|
| 1. Direct economic value generated: Revenues | 30 669 |
| 2. Distributed economic value | 29 575 |
| Operating costs (without depreciation, any kind of taxes and donations) | 23 141 |
| Personnel expenses | 1 817 |
| Dividend | 3 837 |
| Taxes (do not include personnel-related tax) | 776 |
| Donations (without TAO discount) | 4 |
| 3. Economic value retained (1.-2.) | 1 094 |

Tax policy and payment

GRI 3-3, 207-1, 207-2 Duna House Group's most fundamental commitment regarding taxation is to comply with the local legal requirements. Regulatory compliance is implemented primarily by local management boards with the support of various departments, as well as external law agencies. Finance Department is responsible for tax payment compliance and financial requirements. Fulfilment of other law-related requirements (i.e., Anti-Money Laundering Policy) is implemented by the Financial and Internal Control Department, with the involvement of external law agencies. The Financial Department or back-office reports to the Supervisory Authority with the validation of the Board of Directors. An external law agency performs periodic law reviews and updates, which are forwarded to the main departments within the Group. External trainings and updates in this area are provided on a yearly basis in order to keep our colleagues up to date.

We take a proactive approach to tax risks. Potential tax risks are identified through ongoing monitoring and analysis of the organization's financial transactions and tax obligations conducted by our experienced accountants' team. Once a tax risk is identified, it is reported to the Chief Accountant and the Chief Financial Officer, who then assess the significance of the risk and determine the best course of action. The Board of Directors is also informed if the tax risk is considered significant. Evaluation of the tax risk involves consultation with tax advisors to gain a comprehensive understanding of the risk and the available options for managing it. Based on this evaluation, the organization may take various actions to minimize the risk, such as adjusting its financial reporting, negotiating with tax authorities, or implementing internal controls. The effectiveness of the measures taken to manage tax risks is continuously monitored and reviewed to ensure that they are achieving their intended outcomes. The organization may make additional changes or take additional actions as necessary to maintain its commitment to responsible tax management and minimize tax risks.

GRI 207-3 We take our obligations to engage with tax authorities seriously and are committed to maintaining an open, transparent, and cooperative relationship. Our approach involves immediate response to any inquiries or requests for information. We understand the importance of providing a full and complete answer to any questions posed by tax authorities and also ensure that we are fully compliant with all applicable tax laws and regulations. To this end, we have established a strict internal

⁵ IFRS consolidated data for the whole group, on the basis of the profit and loss account.

process that ensures that all responses are thoroughly researched and reviewed before they are submitted to tax authorities.

Our team is knowledgeable about tax laws and regulations and works closely with our tax advisors to ensure that our responses are accurate and comprehensive. We believe that proactive engagement and the timely resolution of any issues is essential to maintain our reputation and to ensure a positive relationship with tax authorities.

Duna House Group has not been fined due to tax reasons in the last three years and has not been fined for a significant amount since the beginning of its operation.

207-2 Taxes are paid when due; tax amounts are calculated and double-checked in the Financial Department, and cross-checked with the official registers of local tax offices to ensure there are no overdue items. The external audit of financial statements covers assurance of disclosed taxes.

| GRI 207-4 Country-by-country reporting, 2022, HUF | Hungary | Poland | Italy |
|---|---------|--------|--------|
| Revenues from third-party sales | 7 706 | 6 621 | 15 569 |
| Revenues from intra-group transactions with other tax jurisdictions | 0 | 0 | 0 |
| Profit/loss before tax | 2 555 | -141 | 1 323 |
| Tangible assets other than cash and cash equivalents | 6 771 | 1 426 | 9 641 |
| Corporate income tax paid on a cash basis | 210 | 0 | 109 |
| Corporate income tax accrued on profit/loss | 292 | 16 | 566 |

Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax: Tax paid is lower, than accrued tax due to negative earnings in past reporting periods.

GRI 201-4 To have an overview regarding payments in relation to the government received financial support should be considered. Duna House Group did not receive any assistance from the governments or the EU in 2022. The government is not present among the shareholders of Duna House Holding.

Suppliers

GRI 2-6 External purchasing is not decisive within the operation of the Company. Duna House Group worked with 856 suppliers in Hungary, with 254 in Poland, and with 811 in Italy. Most of the other suppliers provide primarily different kinds of services, e.g., IT service suppliers, external training providers (though the Group has its own training provider subsidiary in Hungary), and a marketing communication agency in Italy. We have not identified any critical suppliers⁶. Duna House strives to be a fair and correct partner of its suppliers and acts in accordance with the principles of business ethics.

The Italian Credipass has a formalized supplier selection and management procedure regulating the decision criteria and the process of purchasing. Parts of the purchasing are centralized, though departments are also entitled to purchase some kinds of services. The local Board of Directors annually verifies the suppliers’ activities and – if necessary – reassesses the contract.

Taking into consideration our purchasing volume and the number of suppliers we work with, Duna House Group does not create a significant number of jobs through its supply chain.

⁶ Banking partners are not considered as suppliers.

Donations

Duna House Group sides with important social problems and supports communities in need.

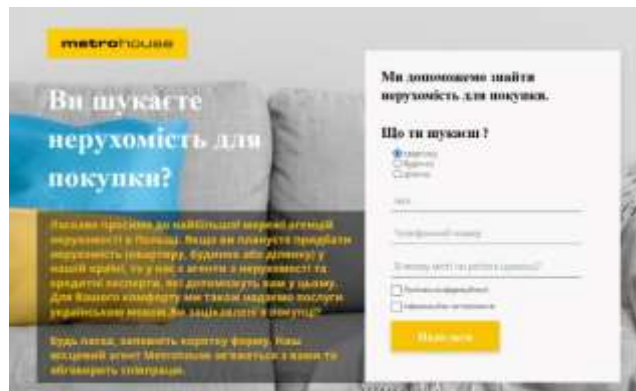
After the outbreak of the war in Ukraine, both the Hungarian and the Polish operations introduced measures to help the refugees. In Poland, Metrohouse helped to find apartments to rent. The Company created a special website in Ukrainian where rental requests could be submitted. The [website's](#) scope was extended targeting people who want to settle permanently in Poland. In order to fasten finding the offers, the system has an option to mark properties that can be quickly made available to rent for Ukrainians.

At Metrohouse headquarters people could offer donations, which we delivered to Ukrainian refugees in Poland. Besides, several supportive events were organized: we prepared useful equipment for soldiers in Ukraine and our colleagues took part in the preparation of sandwiches for Ukrainians who arrived at Warsaw stations by train.

Duna House Holding in Hungary provided in-kind donations, and several events were organized among the employees to collect food and other utensils.

In addition to the support for Ukrainians, we donated to the Bókay Children's Clinic and decorated the waiting rooms of the Radiology and Diabetes Clinic in Hungary. We also participated in an event of Budapest Bike Mafia, prepared sandwiches and delivered them to a temporary hostel of homeless people. Metrohouse organized a Christmas fundraiser campaign for the Polish "Dom w Łodzi" Foundation whose goal is to create a Children's Home for seriously ill, orphaned, and abandoned children.

Franchise partners organise their own events independently.



Green services

As a brokerage and intermediary Group, Duna House Group has limited possibility to offer green services to its clients. In 2022 the only green loan available at our partner banks was the FGS Green Home Programme (NHP Zöld Otthon Program). As part of the green strategy of the Hungarian National Bank, the program was launched to stimulate the demand for green apartments by offering a loan with a favourable (max. 2.5%) fix interest rate. The programme was launched in 2021Q4 and became very popular. The loan could be used for the purchase or construction of newly built residential properties with an energy efficiency rating of at least BB and a primary energy consumption threshold of 90 kWh/m² per year. Later this limit was changed to 80 kWh/m². As the product's commission was capped by the law, sales of this product could not be in our focus. 10.4 billion HUF loan was taken through Duna House (market share: 3,5%) during the whole availability of the programme. 0.5 billion HUF of the total amount was mediated in 2021, and 9.9 billion in 2022.

In addition to real estate appraisal, energy assessment and certification services are provided by our subsidiary, Energetika Tanúsítvány Kft. Energy certification services are carried out by independent specialists. The subsidiary evaluates around 2700 properties annually.

Compliance

GRI 3-3 Duna House Group is committed to fully comply with the external regulations and business ethics. We consider compliance a significant factor in our daily business and long-term sustainability, as it is one of the areas that differentiates us from other businesses in the market. Our priority is to comply with all local and EU-level legal requirements, and with our internal processes.

Responsibility for compliance is dedicated to the internal control departments, who report to the local CEOs. In Italy, Credipass uses a risk-based approach to compliance and has implemented specific compliance-related procedures. The compliance report is governed by the function manager.

GRI 2-27, 206-1, 417-2, 417-3, 406-1, 418-1 There were only a few authority-initiated, legal proceedings against the Group in the last three years. In 2022 3 cases were in progress in Hungary, regarding consumer protection. Supervisory fines were imposed on Duna House Holding by the Hungarian National Bank in 2 cases. The amount of the fines summed 1.1 million HUF, both were due to the late publication of the number of voting rights attached to the shares per series (2 days late once in November 2021 and once in March 2022). No legal proceedings were closed, thus no non-compliance was identified related to products and service information provision, marketing communication, anti-competitive behaviour, equal opportunities/discrimination, personal data protection, taxation, labour and other fields in the last three years. There was no pending proceeding regarding anti-competitive behaviour as well. Duna House Group did not have any incidents of discrimination in the reporting period and in the past 3 years.

GRI 205-1, 205-2, 205-3 As anti-corruption is regulated strictly by law, Duna House Group's goal is to comply with legal regulations; practices are established to meet these requirements. The Code of Ethics declares prohibition of any form of corruption. The Polish subsidiary has implemented further internal regulations related to loan mediation. There were no confirmed incidents of corruption within the Group in 2022 and in the last 3 years. We have not conducted a formal risk assessment related to corruption and no targeted training or communication has been made regarding the topic.

We aim to avoid legal non-compliances and non-compliances with our internal regulations within the headquarters and the network with a dedicated handbook, trainings and controls. In case of a possible non-compliance we use mystery shoppers, and in Hungary private investigators, if needed, to explore the applied practices. We aim to prevent the repeated occurrence of non-compliance issues with trainings, penalties, and lastly termination of agreements (more details in Ch. Franchise Partners and Agents). If necessary, we take legal action as well. Offices, where non-compliance has been identified will be monitored. In Italy, individual compliance reports are drawn up by the Anti-Money Laundering and Internal Audit departments, where corrective actions are defined and the results are monitored over time in subsequent follow-up audits.

We constantly improve our measures and practices to ensure our operation always meets the expectations.

Complaints management

Duna House Group aims to handle, investigate and remedy clients' complaints correctly, fast, and efficiently. Complaints regarding the network are handled centrally. Complaints handled by the claim and/or compliance and internal control departments are judged within 30 days all over Duna House Group. Complaint management regulations and forms to file a complaint are available on the homepages of the Duna House Group members' site. Claims are always registered and tracked.

Duna House Group also aims to improve its practices continuously, to prevent complaints, though as shown in the table, the number of justified complaints is relatively low compared to the service volume.

| Complaints data, 2022 | Hungary | | Poland | | Italy |
|---|--------------------|-----------------------|--------------------|-----------------------|--------------------|
| | Financial products | Real estate brokerage | Financial products | Real estate brokerage | Financial products |
| Total complaints received | 0 | 244 | 0 | 110 | 7 |
| - of these justified | 0 | 26 | 0 | 38 | 4 |
| - compensation paid (HUF) | 0 | 0 | 0 | 820,000 | 0 |
| Complaints regarding information provision | 0 | 18 | 0 | 42 | 2 |
| - of these justified | 0 | 10 | 0 | 17 | 2 |
| - compensation paid (HUF) | 0 | 0 | 0 | 164,000 | 0 |
| Complaints regarding product transparency and clearance | 0 | 0 | 0 | 54 | 0 |
| - of these justified | 0 | 0 | 0 | 16 | 0 |
| - compensation paid | 0 | 0 | 0 | 0 | 0 |

The number of complaints in 2021 was similar to 2022; no significant change happened.

Privacy and data protection

GRI 3-3 As we handle numerous personal data in our daily work, it is essential to have these protected properly according to the EU GDPR legislations (EU Regulation 2016/679) and our own policies. Our policies and practices cover our employees, agents, office managers, franchise partners and clients as well. Every company has its individual Privacy / Personal Data Protection Policy and detailed internal instructions. Our policies are reviewed annually and are updated as necessary. The policies adhere to the following principles, and rules of GDPR, and also to national regulations and recommendations: legality and fairness; transparency; limited purpose; data minimization; correctness; integrity; accountability.

We strive to train all our employees yearly and eliminate any security incidents.

We apply organizational and structural actions aiming to prevent or mitigate the negative effects of insufficient privacy and data protection management. The Data Protection Officer (DPO) is always available quickly for any discussion with the directors of the Duna House Group companies and for the control functions. Each new project is submitted to the DPO which provides the PRE-Data Protection Impact Assessment (DPIA) and if necessary, the DPIA⁷. The DPO plans periodic audits to detect the state of the art of central and peripheral treatments.

As soon as the DPO detects a defective situation in the protection of personal data, he/she interacts with the owner of the process for a timely examination and then updates the Data Controller. In the case of a Data Breach, there is a strict procedure that every company function must follow.

In Poland, Metrohouse Group makes every effort to ensure all means of physical, technical, and organizational protection of personal data against accidental or deliberate destruction, accidental loss, alteration, unauthorized disclosure, use, or access, in accordance with all applicable legal regulations. This is achieved by maintaining the highest standards throughout the premises: such as zoning, (operating room and back of house functions), secure entrances and window openings (on all floors and front and back of the building), document storage, management and destruction following

⁷ A Data Protection Impact Assessment (DPIA) describes a process designed to identify risks arising out of the processing of personal data and to minimise these risks as far and as early as possible.

all the current guidelines (fire proofing and security, shredding procedures and the highest standards of IT data protection procedures).

We are open to any suggestions regarding the improvement of personal data security. If Customers have any questions regarding our Privacy Policy, Cookies Policy, or others regarding the protection of personal data, they may contact our team dedicated to the protection of personal data by sending an e-mail to the following address: kontrola@metrohouse.pl, adatvedelem@dh.hu, privacy@hgroup.company.

Our customers have the right to make a complaint to the President of the Personal Data Protection Office if the processing of data violates the provisions on the protection of personal data. Personal data is not transferred to countries outside the European Economic Area.

GRI 418-1 There were no substantiated privacy and personal data protection complaint in 2022. We track the efficiency of privacy and data protection management with the following KPIs in Hungary and Poland:

- Percentage of employees trained in the field privacy and data protection: 100%, every currently employed person is trained in data security.
- Number of security incidents in privacy and data protection: 0 data security incident in 2022.
- Number of customer complaints made to the Personal Data Protection Office: 0 complaints in 2022.

In Italy efficiency is tracked by the periodic audits planned by the DPO.

Human Resources

GRI 3-3 Duna House Group is committed to fair employment in every country of its operation. We are devoted to creating a correct and attractive working environment. As Duna House Group consists of relatively small organisations, we have flat organisational structures. This means limited career advancement opportunities on the one hand, but an open and direct corporate culture, with empowered managers on the other. We believe that managers play a determining role in shaping corporate culture. At Duna House Group management has personal contact with all the employees. Any concerns and problems can be raised to the direct supervisor, HR Department or the management, and objective and discrete handling of issues is ensured.

Building a cohesive and inclusive team is one of our priorities supported by several events over the year, both business-related and informal ones. We celebrate and recognize the best salespersons and offices at Award Gala Dinner every year, we have a traditional Christmas Lunch, in 2022 we have celebrated Halloween at the HQ with a custom competition, we have Duna House Pub events regularly and we had more sports days in 2022. Business Brunches are organised to provide first-hand information from the management to the employees on current news and the business performance of the company.



Employment in numbers

GRI 2-7 Duna House Group employs 213 people⁸ in the CEE region. In the case of Italy and Hungary, full-time employment is typical whereas in Poland part-time employment is more common (52%). On the group level, the share of full-time employment is 74%.

| GRI 2-7, 2-8 Employment data, 31.12.2022 | | | | | | |
|---|-----------|-----------|-----------|------------|-----------|------------------|
| | Hungary | Poland | Italy | Female | Male | Duna House Group |
| Full-time employees | 63 | 39 | 55 | 117 | 40 | 157 |
| Part-time employees | 4 | 43 | 9 | 46 | 10 | 56 |
| Total headcount | 67 | 82 | 64 | 163 | 50 | 213 |
| <i>Note: Active employees, in persons. No non-guaranteed hours employment exists at the Group. Besides agents the Group does not rely on external workers, whose work is controlled by the organisation.</i> | | | | | | |

Part-time employment is typical among female workers in Italy and Hungary. As previously mentioned, related to the agents, part-time work is considered to be an effective tool in creating work-life balance and promoting the well-being of the employees.

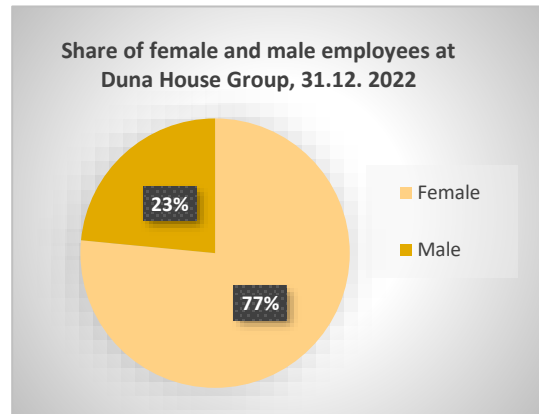
In the case of Hungary, all employees are hired with a permanent contract and the share of temporary employment is also low in Italy. Within Polish operations almost half of the employees work with a fix-term contract.

⁸ Considering the scope of this report. Employment data are accurate and derive from our internal records.

| GRI 2-7 Employment data, 31.12.2022 | | | | | | |
|--|-----------|-----------|-----------|------------|-----------|------------------|
| | Hungary | Poland | Italy | Female | Male | Duna House Group |
| Permanent employees with indefinite contract | 67 | 44 | 60 | 128 | 43 | 171 |
| Temporary employees with definite contract | 0 | 38 | 4 | 35 | 7 | 42 |
| Total headcount | 67 | 82 | 64 | 163 | 50 | 213 |

GRI 3-3, 405-1, 405-2 We value diversity and are committed to providing equal opportunities to all our employees. Career opportunities depend on personal skills and performance.

Regarding the gender breakdown of the group, the share of female workers outweighs the rate of male workers, though on managerial levels their share is lower. However, there are significant differences according to the countries of operation. The Supervisory Board and Management Board of Duna House Holding has no female members. The majority of the employees are between 30 and 50 years (71%), while other age groups, such as employees under 30 years (14%) and employees above 50 years (15%) are in balance. No disabled person works at Duna House Group. In the case of Hungary, 3 pensioner workers are employed.

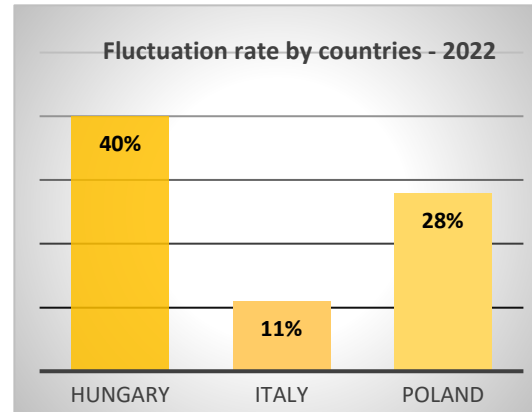


| GRI 405-1 Employee and governance bodies diversity, 31.12.2022 | | | | | | |
|--|--------|------|----------------|---------------------|----------------|--|
| | Female | Male | Under 30 years | Between 30-50 years | Above 50 years | Duna House Group total headcount, person |
| Supervisory Board members ¹ | 0% | 100% | 0% | 0% | 100% | 3 |
| Management Board members ¹ | 0% | 100% | 0% | 60% | 40% | 5 |
| Senior managers | 0% | 100% | 0% | 75% | 25% | 4 |
| Middle managers | 38% | 62% | 0% | 73% | 27% | 13 |
| Subordinates | 80% | 20% | 15% | 70% | 14% | 196 |

¹ Members of Duna House Holding bodies, as these are the highest governance bodies of the Group.

Turnover and new hires

GRI 3-3, 401-1, 401-2 According to the chart a higher fluctuation rate could be experienced in Hungary. While managers and key position employees are loyal to the Company, there are some typical positions where turnover is high. Lack of career advancement opportunities also contributes to higher turnover. We intended to ease fluctuation with extra benefits in managerial positions. In the case of Hungary and Poland, the rate of new hires falls short of the number of departing employees.



In line with the general trends, the highest turnover can be seen among young employees.

| | Female | Male | Under 30 years | Between 30-50 years | Above 50 years | Duna House Group |
|-------------------------------------|--------|------|----------------|---------------------|----------------|------------------|
| Total number of newly hired persons | 34 | 13 | 18 | 22 | 7 | 47 |
| Rate of new hires | 21% | 26% | 60% | 14% | 21% | 22% |
| Employees left the company | 41 | 16 | 14 | 36 | 7 | 57 |
| Turnover rate | 25% | 32% | 47% | 24% | 22% | 27% |

Remuneration and performance evaluation

GRI 3-3 Comparisons of female and male employees' compensation were made based on base salaries within employee grade levels, although not all categories can be calculated: there are no female managers among Hungarian senior managers and there is only one person in the middle management in Poland.

| | Hungary | Poland | Italy |
|-----------------|----------------|----------------|----------------|
| Senior managers | not applicable | 100% | not applicable |
| Middle managers | 88% | not applicable | 112% |
| Subordinates | 71% | 119% | 97% |

Pay disparity within the Group can be seen in the table.

| | Hungary ¹ | Poland | Italy |
|---|----------------------|--------|-------|
| Ratio of the highest-paid individual to the median | 3.01 | 2.97 | 2.04 |
| Percentage increase of the ratio of the highest-paid individual to the median | 1.92 | 0.82 | 0.00 |

¹ Calculated on the basis of one month salary.

In regard to benefits, Duna House Group does not differentiate between part-time and full-time employees. The provision of benefits differs within the Group. Duna House Group is committed to be a fair employer during hard times as well, and managers set an example. During Covid-19, more managers gave up a part of their salary voluntarily in Hungary and a 30% reduction of salaries was a result of a mutual agreement between employees and the management, in order to save workplaces. In 2022 we paid a one-time loyalty bonus to our employees, to those having undertaken to work for the company for over 6 months, to cope with the increased costs as a result of the high inflation in Hungary. The Board of Directors decides about the annual salary increase which was two-digit in 2022.

GRI 404-3 We believe in continuous feedback, though formal performance evaluation is not conducted everywhere in the Group. Bonuses are also paid quarterly in Hungary, and managers conduct evaluations accordingly. In Poland, regular and formal performance evaluation covers fewer employees, and are not conducted in Italy.

As a token of appreciation for our managers, we provide fringe benefits of bonuses, share-based benefit programmes and health insurance services. The Remuneration Report of Duna House Holding for 2022 is published on the date of the General Meeting in 2023. A significant change concerning the payment of benefits happened in 2022, that instead of the former bi-annual cycle it will be paid annually.

Well-being of employees, health, and safety

GRI 3-3 Duna House Group aims to improve the well-being of its employees. The company introduced flexible working conditions during the Covid-19 pandemic. These conditions are still in effect in Hungary and Italy, whereas in Poland they were reduced as the severity of the pandemic eased.

GRI 401-3 Parental leave was used only by female employees within the group in 2022. Half of the employees returned to the Group after the parental leave ended, and the retention rate was also 50%.

| GRI 401-3 Parental leave, 2022 | |
|---|------------------|
| | Duna House Group |
| Total number of employees who took parental leave | 10 |
| Total number of employees who returned to work after taking parental leave | 5 |
| Total number of returned employees who are still employed within 12 months after parental leave ended | 5 |
| Return to work rate | 50% |
| Retention rate | 50% |

Aiming to promote healthy lifestyle fruit days, massage services, and joint sports activities are organised in Hungary. A Scout Day was arranged for franchise partners and HQ members. Participants could compare their abilities and knowledge in competitions at Lake Tisza.

GRI 403-2 403-3 403-5 403-6 403-9 Safe and healthy work environments are ensured in all countries of operation. Health, safety, and fire protection are regulated in accordance with the relevant laws and regulations of each country of operation, and compulsory risk assessment is also done accordingly. Health, safety, and fire safety trainings are part of the introductory training. Trainings cover generic information and company specific aspects. Obligatory medical health check-ups are complemented with supplementary healthcare services in the case of Poland and Italy, whilst in Hungary healthcare

services are provided to managers. Workplaces are designed to promote healthy, safe, and ergonomic work environments, supervised by external health and safety experts as well. Health and safety are also supported by a “Prevention and Protection System” management tool in Italy. This system is responsible for the monitoring of health and safety-related data of each employee, and supports the periodical reporting and planning of health and safety-related targets. We are devoted to the continuous revision and improvement of the working environment in our offices in all countries of operation, backed by regular reporting on work-related incidents. There were no work-related injuries in 2022 within Duna House Group.

GRI Content Index

The GRI Content Index contains technical information on the use of the GRI Standards, and lists the indicators included in the ESG Report.

| GRI 2-3 Use of GRI Standards | |
|-----------------------------------|---|
| Statement of use | <i>Duna House Holding Nyrt. has reported in accordance with the GRI Standards for the period 01.01.2022 and 31.12.2022.</i> |
| GRI 1 used | <i>GRI 1: Foundation 2021</i> |
| Applicable GRI Sector Standard(s) | - |

| Indicator number | Description of indicator | Where to find (chapter titles) | Comment/ Reason for omission |
|---|---|---|------------------------------|
| Indicators without number are the Duna House Group's own indicators. | | | |
| GRI 2: General Disclosures 2021 | | | |
| The organization and its reporting practices | | | |
| 2-1 | Organizational details | Introduction of the Duna House Group and Governance | |
| 2-2 | Entities included in the organization's sustainability reporting | Introduction of the Duna House Group and Governance | |
| 2-3 | Reporting period, frequency and contact point | About the ESG Report | |
| 2-4 | Restatements of information | GRI Content Index | No restatement happened. |
| 2-5 | External assurance | About the ESG Report | |
| Activities and workers | | | |
| 2-6 | Activities, value chain and other business relationships | Introduction of the Duna House Group and Governance, Direct and Indirect Economic Impacts | |
| 2-7 | Employees | Human Resources | |
| 2-8 | Workers who are not employees | Human Resources | |
| Governance | | | |
| 2-9 | Governance structure and composition | Introduction of the Duna House Group and Governance | |
| 2-10 | Nomination and selection of the highest governance body | Introduction of the Duna House Group and Governance | |
| 2-11 | Chair of the highest governance body | Introduction of the Duna House Group and Governance | |
| 2-12 | Role of the highest governance body in overseeing the management of impacts | Introduction of the Duna House Group and Governance | |
| 2-13 | Delegation of responsibility for managing impacts | Introduction of the Duna House Group and Governance | |
| 2-14 | Role of the highest governance body in sustainability reporting | About the ESG Report | |
| 2-15 | Conflicts of interest | Introduction of the Duna House Group and Governance | |
| 2-16 | Communication of critical concerns | Introduction of the Duna House Group and Governance | |

| | | | |
|---|--|---|--|
| 2-17 | Collective knowledge of the highest governance body | GRI Content Index | There has been no such practice so far. |
| 2-18 | Evaluation of the performance of the highest governance body | Introduction of the Duna House Group and Governance | |
| 2-19 | Remuneration policies | website | https://dunahouse.com/en/publications : Remuneration Report. |
| 2-20 | Process to determine remuneration | website | https://dunahouse.com/en/publications : Remuneration Report, Documents of the General Meeting. |
| 2-21 | Annual total compensation ratio | Human Resources | |
| Strategy, policies and practices | | | |
| 2-22 | Statement on sustainable development strategy | Letter from the CEO | |
| 2-23 | Policy commitments | Introduction of the Duna House Group and Governance | |
| 2-24 | Embedding policy commitments | Introduction of the Duna House Group and Governance | |
| 2-25 | Processes to remediate negative impacts | Introduction of the Duna House Group and Governance | |
| 2-26 | Mechanisms for seeking advice and raising concerns | Introduction of the Duna House Group and Governance | |
| 2-27 | Compliance with laws and regulations | Compliance | |
| 2-28 | Membership associations | Introduction of the Duna House Group and Governance | |
| Stakeholder engagement | | | |
| 2-29 | Approach to stakeholder engagement | Introduction of the Duna House Group and Governance | |
| 2-30 | Collective bargaining agreements | GRI Content Index | There is no collective bargaining agreement within the Group. |
| GRI 3: Material topics 2021 | | | |
| 3-1 | Process to determine material topics | Materiality Analysis | |
| 3-2 | List of material topics | Materiality Analysis | This is the first ESG report of the Company. |
| GRI 3: Material topics 2021 | | | |
| Responsible information management | | | |
| 3-3 | Management of material topics | Responsible Sales | |
| 417-2 | Incidents of non-compliance concerning product and service information and labelling | Compliance | |
| | Complaints regarding information provision | Compliance | |
| Easy to understand and transparent products and services | | | |
| 3-3 | Management of material topics | Responsible Sales | |
| | Rules of partner selection | Responsible Sales | |
| | Customer complaints/satisfaction regarding product transparency and clearance | Compliance | |
| Responsible marketing communication | | | |
| 3-3 | Management of material topics | Responsible Sales | |
| 417-3 | Incidents of non-compliance concerning marketing communication | Compliance | |
| | General rules on wording related to customer communication as well to | Responsible Sales | |

| | | | |
|---|--|--|--|
| | advertisements (internal rules for real estate brokerage) | | |
| Expanding customers' financial literacy | | | |
| 3-3 | Management of material topics | Responsible Sales | |
| | Ways of financial literacy development | Responsible Sales | |
| | Persons reached by special financial literacy programs | Responsible Sales | |
| GRI 406 Non-Discrimination 2016 | | | |
| 3-3 | Management of material topics | Compliance | |
| 406-1 | Incidents of discrimination and corrective actions taken | Compliance | |
| GRI 207 Tax 2019 | | | |
| 3-3 | Management of material topics | Direct and Indirect Economic Impacts | |
| 207-1 | Approach to tax | Direct and Indirect Economic Impacts | Duna House Group has not formulated a specific tax strategy. |
| 207-2 | Tax governance, control and risk management | Direct and Indirect Economic Impacts | |
| 207-3 | Stakeholder engagement and management of concerns related to tax | Direct and Indirect Economic Impacts | |
| 207-4 | Country-by-country reporting | Direct and Indirect Economic Impacts | |
| Contribution to economic growth | | | |
| 3-3 | Management of material topics | Direct and Indirect Economic Impacts | |
| 201-1 | Direct economic value generated and distributed incl.: Amount of financial help, donation to a specific aim (or NGO) | Direct and Indirect Economic Impacts | |
| 201-4 | Financial assistance received from government | Direct and Indirect Economic Impacts | |
| 203-2 | Significant indirect economic impacts | Franchise Partners and Agents | Employees of franchise partners and agents. |
| Green services | | | |
| 3-3 | Management of material topics | Direct and Indirect Economic Impacts | |
| | Volume and characteristics of green loan brokerage | Direct and Indirect Economic Impacts | |
| | Amount and rate of energy efficiency certificates made | Direct and Indirect Economic Impacts | |
| Training of the Franchise Partners | | | |
| 3-3 | Management of material topics | Franchise Partners and Agents | |
| | Average training hours of franchise workers and agents | Franchise Partners and Agents | 404-1 indicator interpreted for Franchise partners and agents. |
| Ethical behaviour of Franchise Partners | | | |
| 3-3 | Management of material topics | Franchise Partners and Agents | |
| | Compliance with laws and regulations of Franchise partners | Franchise Partners and Agents | 2-27, 417-2, 417-3, 206-1 indicators interpreted for Franchise partners and network. |
| | Code of Conduct to be followed by the Franchise Partners | Introduction of the Duna House Group and Governance, Franchise Partners and Agents | |
| Fair terms towards Franchise Partners | | | |
| 3-3 | Management of material topics | Franchise Partners and Agents | |
| | Results of the satisfaction survey of Franchise Partners | Franchise Partners and Agents | |

| | | | |
|--|--|-------------------------------|---|
| GRI 414 Supplier Social Assessment 2016 (Franchise partners and agents) | | | |
| 3-3 | Management of material topics | Franchise Partners and Agents | |
| 414-2 | Negative social impacts in the supply chain and actions | GRI Content Index | Interpreted for Franchise Partners. No negative social impact is identified. |
| | New franchise worker and agent hires and franchise worker and agent turnover | Franchise Partners and Agents | 401-1 indicator interpreted for agents |
| GRI 401 Employment 2016 | | | |
| 3-3 | Management of material topics | Human Resources | |
| 401-1 | New employee hires and employee turnover | Human Resources | |
| 401-2 | Benefits provided to full-time employees that are not provided to temporary or part-time employees | Human Resources | |
| 401-3 | Parental leave | Human Resources | |
| GRI 404 Training and Education 2016 | | | |
| 3-3 | Management of material topics | Human Resources | |
| 404-1 | Average hours of training per year per employee | GRI Content Index | There was no training besides the compulsory ones in 2022. |
| 404-2 | Programs for upgrading employee skills and transitions assistance programs | GRI Content Index | Internal and external trainings are available. |
| 404-3 | Percentage of employees receiving regular performance and career development reviews | Human Resources | |
| GRI 403 Healthy and safe working conditions 2018 | | | |
| 3-3 | Management of material topics | Human Resources | |
| 403-1 | Occupational health and safety management system | GRI Content Index | No management system is in place. |
| 403-2 | Hazard identification, risk assessment and incident investigation | Human Resources | |
| 403-3 | Occupational health services | Human Resources | |
| 403-5 | Worker training on occupational health and safety | Human Resources | |
| 403-6 | Promotion of worker health | Human Resources | |
| 403-9 | Work-related injuries | Human Resources | |
| GRI 405 Diversity and Equal Opportunity 2016 | | | |
| 3-3 | Management of material topics | Human Resources | |
| 405-1 | Diversity of governance bodies and employees | Human Resources | |
| 405-2 | Ratio of basic salary and remuneration of women to men | Human Resources | Ratio of total remuneration is not reported, as data are not available. Significant locations of operation are Hungary, Poland and Italy. |
| GRI 205 Fighting against corruption 2016 | | | |
| 3-3 | Management of material topics | Compliance | |
| 205-1 | Operations assessed for risks related to corruption | Compliance | |
| 205-2 | Communication and training about anti-corruption policies and procedures | Compliance | |
| 205-3 | Confirmed incidents of corruption and actions taken | Compliance | |
| Compliance with consumer protection laws | | | |
| 3-3 | Management of material topics | Compliance | |
| 2-27 | Compliance with laws and regulations | Compliance | |
| GRI 206 Anti-competitive behaviour 2016 | | | |
| 3-3 | Management of material topics | Compliance | |
| 206-1 | Legal actions for anti-competitive behaviour, anti-trust and monopoly practices | Compliance | |

| | | | |
|--|--|------------|--|
| GRI 418 Privacy and data protection 2016 | | | |
| 3-3 | Management of material topics | Compliance | |
| 418-1 | Substantiated complaints concerning breaches of customer privacy and losses of customer data | Compliance | |
| Other cases of compliance | | | |
| 3-3 | Management of material topics | Compliance | |
| 2-27 | Compliance with laws and regulations | Compliance | |

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Please share your opinion with us at esg@dunahouse.com.