

4.14 ESG and sustainability-related data processing

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1. Collection of ESG data from direct suppliers and liaison The purpose of processing is for Egis to collect from its direct suppliers the ESG data specified in the applicable legislation, document the source of the data submission and the identity of the person acting on behalf of the supplier, and communicate with the supplier regarding completion and clarification of the questionnaire and any supplementation of missing information. This includes in particular: • due diligence on direct suppliers based on an ESG questionnaire; • sending, receiving and documenting the questionnaire and the related data sheet; • liaison concerning completion of the	Processing related to the use of the questionnaire and data sheet prescribed by law is necessary for compliance with a legal obligation to which Egis is subject, pursuant to Article 6(1)(c) of the GDPR. The processing of additional contact data not expressly specified by law but necessary for sending, completing, clarifying and documenting the questionnaire is based on Egis's legitimate interests pursuant to Article 6(1)(f) of the GDPR. Egis's legitimate interest is to coordinate ESG data reporting appropriately, manage questions and requests for supplementation, and ensure that the data collection process can subsequently be demonstrated.	The supplier questionnaire predominantly contains aggregated, company-level ESG data, which in itself does not constitute personal data. However, the data sheet in Annex 2 to the SZTFH Decree contains the following personal data: • representative's name; • telephone number; • e-mail address; • date of completion. Additional personal data not specified by law and processed on the basis of legitimate interests include in particular: • the content of questions and enquiries concerning the questionnaire; • data contained in correspondence and consultations with Egis; • the fact and content of any clarification or	We process your personal data for five years following submission of the due diligence questionnaire. Egis processes ESG data and related personal data manually within electronic and, where relevant, paper-based document and records management processes protected by appropriate access permissions. In the future, manual processing may be replaced by ESG software registered by the competent authority and compliant with the cybersecurity requirements of the NIS2 Directive. Authorised to access the data within Egis: the relevant employees of the EHS Directorate and the Procurement Directorate. Processors: An ESG consultant, certifier, auditor or expert, and

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questionnaire; • clarification of responses and, where necessary, requests for supplementation of missing information. The processing also aims to document the origin and authenticity of the submitted questionnaire, the representative's authority to act, and receipt of the electronic and hard-copy versions. Legal background: Act CVIII of 2023 laying down the rules of corporate social responsibility taking into account environmental, societal and social considerations to promote sustainable finance and unified corporate responsibility, and amending certain related Acts (hereinafter: ESG Act) defines the term „ESG”. ESG means: “a set of criteria related to sustainability issues	As regards the legal obligation, Section 13(f) of the ESG Act provides that: “The sustainability due diligence obligations of the undertaking shall include the following: f) obtaining a statement from direct suppliers regarding any ESG risks they face.” SZTFH Decree No. 13/2024 (VIII. 15.) (issued by the President of the Supervisory Authority for Regulated Activities) establishes the detailed rules for how companies in Hungary fulfill their sustainability-related due diligence obligations under the ESG Act. Pursuant to Section 4(5) of SZTFH Decree 13/2024 (VIII. 15.), the undertaking may assess its direct suppliers on multiple occasions using questions selected from different questionnaires.	supplementation of missing information; • the contact person's name, position and business contact details, where the contact person is not the same as the representative indicated on the data sheet; • the name, data concerning the authority to represent or organisational role, and signature of the person signing the questionnaire; • data concerning the sender and delivery of the postal consignment; • the dates on which the electronic and hard-copy versions of the questionnaire were received; • the outcome of verifying that the questionnaire was duly signed on behalf of the	ESG software, engaged by Egis where applicable. Egis currently uses the support of Stradamus Zrt. (seat: 1122 Budapest, Krisztina korut 5. 1/2; e-mail: kapsolat@stradamus.hu). The data may also be accessed by the Supervisory Authority for Regulated Activities when acting within its statutory inspection powers, and by other authorities and courts pursuant to legislation or an order of an authority or court.

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that evaluates the impacts and factors concerning the environment, society and governance at a specific undertaking from a sustainability perspective”. [Section 7(4) of the ESG Act] ESG data provision means: “any information regarding sustainability issues transmitted or disclosed to another organisation or individual, including the ESG report” [Section 7(5) of the ESG Act]	Pursuant to Section 4(9) of the SZTFH Decree, the undertaking collects data from direct suppliers involved in the due diligence process using the questionnaire specified by law. The applicable questions are determined in Section 4(10). Pursuant to Section 4(11) of the SZTFH Decree, together with the questionnaire the undertaking also sends the direct supplier the data sheet set out in Annex 2 to the Decree for completion.	company and that the signatory had authority to represent it. Please do not include in the questionnaire's free-text fields identifying data concerning employees, complainants, reporting persons or other natural persons, or information by which a data subject may be identified directly or indirectly. Responses must be provided at organisational level, in aggregated or anonymised form. The sources of the personal data are the data subject, the direct supplier, its representative or contact person, and the person signing or mailing the questionnaire.	
2. ESG risk analysis and risk management The purpose of processing is for Egis to identify, assess and prioritise environmental, social	The legal basis for processing personal data necessary in the course of ESG risk analysis and risk management required by law is compliance with a legal obligation to which Egis is	Categories of data processed: The ESG risk analysis is primarily directed at the activities, operations and ESG risks of the direct supplier organisation. Most information	Egis processes documents containing personal data generated as part of the risk analysis for the period necessary to document compliance with ESG obligations, implement and

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and governance risks, and actual or potential adverse impacts, connected with its own activities, those of its subsidiaries and those of its direct suppliers. Processing also covers determining, implementing and monitoring the necessary preventive, risk-mitigation and corrective measures, documenting the results of the risk analysis, and reporting them to Egis's management. This includes in particular: • assessment of data received from direct suppliers; • classification and ranking of suppliers from an ESG risk perspective; • assessment of the severity and likelihood of identified adverse impacts; • determination of preventive and corrective measures;	subject, pursuant to Article 6(1)(c) of the GDPR. SZTFH Decree 13/2024 (VIII. 15.) requires the operation of a documented risk management system, analysis of supplier data received, and the assessment, prioritisation and management of identified risks. Where Egis processes personal data not expressly specified by law but necessary to ensure the reliability or documentability of the risk analysis or to monitor the prescribed measures, the legal basis is Egis's legitimate interests pursuant to Article 6(1)(f) of the GDPR. Egis's legitimate interest is to conduct the ESG risk analysis required by law taking into account information available to it that, although not expressly specified by law, is necessary for the reliability and documentability of the	used in the risk analysis is company-level data that is not related to an identified or identifiable natural person and therefore is not subject to the GDPR. In particular, Egis may process the following company data during the risk analysis: • ESG data and supplementary information provided by the supplier; • the supplier's ESG risk classification; • identified environmental, social and governance risk factors; • actual or potential adverse impacts; • results of the assessment and prioritisation of risks; • proposed or implemented preventive, risk-mitigation and corrective measures;	monitor risk management measures, and support any regulatory inspection, but for no longer than five years. Egis processes ESG data and related personal data manually within electronic and, where relevant, paper-based document and records management processes protected by appropriate access permissions. In the future, manual processing may be replaced by ESG software registered by the competent authority and compliant with the cybersecurity requirements of the NIS2 Directive. Authorised to access the data within Egis: the relevant employees of the EHS Directorate and the organisational units designated in Egis's internal ESG policy as participants in the ESG risk management process. As regards the results of the risk analysis, Egis's management and designated decision-makers.

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• monitoring the effectiveness of measures taken; • preparation of annual and ad hoc risk analyses; • presentation of the results of the risk analysis to Egis's management.	assessment, and to manage identified risks appropriately and monitor the measures taken. The first sentence of Section 16 of the ESG Act provides: „The undertaking shall establish an adequate and effective risk management system to ensure compliance with sustainability due diligence obligations.” Pursuant to Section 2 of the SZTFH Decree, the undertaking develops and operates a documented risk management system in order to identify and minimise ESG risks within its own business operations and supply chain. Section 4(7) of the SZTFH Decree provides: “The undertaking shall analyse all data received from direct suppliers on the basis of a consideration of the risks.”	• data concerning implementation and effectiveness of the measures; • internal assessments, decisions and reports related to the ESG risk analysis. Personal data is processed only where information actually used for the risk analysis relates to an identified or identifiable natural person. Such data may include in particular: • information concerning a natural person that may appear in a free-text response or an annex to the questionnaire; • information concerning a natural person affected by an ESG risk, an actual or potential adverse impact, or a preventive or corrective measure;	Processors: an ESG consultant, certifier, auditor or expert, and ESG software, engaged by Egis where applicable. Egis currently uses the support of Stradamus Zrt. (seat: 1122 Budapest, Krisztina korut 5. 1/2; e-mail: kapcsolat@stradamus.hu). The data may also be accessed by the Supervisory Authority for Regulated Activities when acting within its statutory inspection powers, and by other authorities and courts pursuant to legislation or an order of an authority or court.

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	Under Section 5 of the SZTFH Decree, the undertaking identifies, assesses and prioritises ESG risks and adverse impacts, while Section 6(1) requires the results of the risk analysis to be presented to management in a report. Sections 7 and 8 require preventive and corrective measures to be taken.	- the name and position of the author or approver of a document related to the ESG risk analysis or the person responsible for a related measure, and data concerning that person's activities during the procedure. - Where possible, Egis uses information concerning employees and other natural persons only in aggregated or anonymised form and does not request individual employee data in the ESG questionnaire. Egis processes ESG data and related personal data manually within electronic and, where relevant, paper-based document and records management processes protected by appropriate access permissions. In the future, manual processing may be replaced by ESG	

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		software registered by the competent authority and compliant with NIS2 cybersecurity requirements. Egis does not carry out automated profiling of natural persons. The ESG risk assessment is primarily directed at the activities of the supplier organisation and the related ESG risks.	
3. Processing related to ESG complaint handling The purpose of processing is to receive, register, preliminarily assess, classify by ESG area and risk, investigate, document and close ESG complaints; communicate with the complainant; determine and monitor necessary preventive, corrective or remedial measures; and evaluate and improve the effectiveness of the complaint-handling system on the basis of aggregated data.	Processing is necessary for compliance with a legal obligation to which Egis is subject, pursuant to Article 6(1)(c) of the GDPR. Section 28(1) of the ESG Act provides: „The undertaking shall establish an internal or external complaints handling system capable of receiving reports from anyone concerning social responsibility and environmental risks, as well as breaches of social responsibility	Categories of data processed: Depending on the nature and content of the complaint, Egis may process the following data: - the complainant's name and contact details, unless the complaint was submitted anonymously; - unique case identifier; date of the observation or event; relationship between the complainant and	Section 28(3) of the ESG Act provides: „The undertaking shall retain the outcomes of complaints handling for a period of 5 years following the closure of complaints handling proceedings initiated on the basis of reports received by both the internal and external complaints handling systems.” Egis retains the complaint, its attachments, investigation documents, related communications and other personal data for the period

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A complaint may be submitted through an electronic form or to the e-mail address designated by Egis for this purpose. Egis records reports in a restricted-access, SharePoint-based electronic complaint register and processes related communications and, where submitted by e-mail, attachments as part of the complaint-handling documentation.	or environmental obligations arising from the economic activities of the undertaking itself, its subsidiary or its direct supplier.” Pursuant to Section 6(4) of the SZTFH Decree, an ad hoc risk analysis must be conducted on the basis of a complaint or report concerning ESG risks.	Egis, a subsidiary or the supplier; • date and method of submission of the complaint; • ESG subject matter of the complaint and its classification by ESG area; • content of the complaint and the circumstances described in it; • names, positions or other necessary identifying data of persons concerned by the complaint; • declarations concerning good-faith reporting and acknowledgement of the privacy notice; • documents and evidence supporting the complaint; • statements, findings and measures generated during the investigation;	necessary to investigate the complaint and implement measures, but for no longer than five years. Processing takes place in Microsoft Forms, e-mail and SharePoint environments, within a primarily manual/ESG-software-based assessment and decision-making process. An automatic acknowledgement does not constitute automated decision-making. Authorised to access the data within Egis: the ESG Complaint Handling Officer, the ESG Coordinator and the members of the ESG team designated to handle the complaint. Depending on the content of the case and the needs of the investigation, and solely to the extent necessary to perform their duties, access may be granted to the ESG Head, the relevant member of the ESG Committee, the Ethics Committee, and designated

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		• outcome of the investigation and date of closure; • response provided to the complainant and related communications; • risk classification and priority. Sources of personal data may include: • the data subject; • the direct supplier; • the direct supplier's representative or contact person; • an employee of Egis or of the subsidiary concerned; • the person submitting or participating in the investigation of the ESG complaint; • an official or authentic public register accessible by law.	employees of Egis's legal, compliance, internal audit, procurement or other relevant functions. The company manager or management forum deciding on the necessary measure may access only the data required for that decision. Transfer of a case to the Egis Ethics Committee: Where the complaint primarily falls within the scope of the Egis Ethics Line Procedure or another internal investigation procedure, the complaint and the personal data required to handle it may be transferred to the Ethics Committee or the competent internal organisational unit, subject to the applicable confidentiality and access requirements. Where the complainant's contact details are available, Egis informs the complainant that the case has been transferred to another procedural channel.

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		Additional sources may arise during the investigation of a complaint: • persons interviewed; • internal organisational units concerned; • direct or indirect suppliers; • contracts and records; • site inspection or audit; • Ethics Committee; • internal or external expert.	Processors: An ESG consultant, certifier or auditor expert engaged by Egis where applicable. Egis currently uses the support of Stradamus Zrt. (seat: 1122 Budapest, Krisztina körút 5. 1/2; e-mail: kapcsolat@stradamus.hu). The data may also be accessed by the Supervisory Authority for Regulated Activities when acting within its statutory inspection powers, and by other authorities and courts pursuant to legislation or an order of an authority or court.