

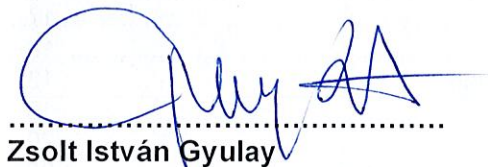
## HUNGARORING SPORT ZRT.

# REGULATIONS FOR THE SUSTAINABILITY MANAGEMENT SYSTEM

The regulations were developed in accordance with the FIA's sustainability principles.

Effective date: April 27, 2026

Approved by:



Zsolt István Gyulay  
Chairman and CEO



szakterület

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**LIST OF AMENDMENTS**

Revision Nr	AMENDMET	
	Date	Description
00	2025.10.30.	Publication of the Basic Revision
01	2026.04.27.	<p>Additions following the implementation of ISO 14001 and the update of sustainability-related principles. The amendments include the following:</p> <ol style="list-style-type: none"> <li>1. Inclusion of new annexes in the list;</li> <li>2. A minor addition regarding stakeholders in clause 2.1.4;</li> <li>3. Section 2.2.1: Highlighting suppliers and subcontractors;</li> <li>4. Section 2.2.2: Addition regarding policy review;</li> <li>5. Section 2.2.3: Addition regarding support for process owners;</li> <li>6. Chapter 2.3.1 – Assessment of risks and opportunities – management methods based on risk level;</li> <li>7. Chapter 2.3.3: Explanation of the SMART approach;</li> <li>8. Chapter 2.3.3: More flexible management of goal review intervals;</li> <li>9. Environmental factor and impact assessment – what does the HSZRT consider when planning activities – life cycle approach;</li> <li>10. Chapter 2.4.1: Aspects of preparedness;</li> <li>11. Chapter 2.4.3: Training planning, competency records;</li> <li>12. 2.5.2. Regulation of communication and feedback – responsibility, monitoring, reporting of data;</li> <li>13. New chapter: Infrastructure;</li> <li>14. Addition to Chapter 2.6;</li> <li>15. Addition to Chapter 2.6.2 – Monitoring and measuring suppliers and subcontractors;</li> <li>16. Review of Chapter 2.7.1 – FIA Sections 8–17;</li> <li>17. Regulation of measurement tools used;</li> </ol>

**APPENDICES RELATED TO THE REGULATIONS**

NR	TITLE
1.	Training Record
2.	Internal Audit Plan
3.	Internal Audit Checklist
4.	The criteria established by F1 that must be followed during the procurement process
5.	Structured feedback management monitoring system
6.	Environmental Factors and Impact Assessment
7.	Training plan
8.	Monitoring compliance with ISO 14001 and sustainability requirements

## I. Chapter 1: GENERAL PROVISIONS

### 1.1. Preamble

The purpose of these Sustainability Management System Regulations (hereinafter referred to as the “Regulations”) is to set forth the provisions governing the sustainability management system of HUNGARORING Sport Zrt. (hereinafter referred to as “**HSZRT**” or the “**Company**”), taking into account the FIA’s sustainability principles.

### 1.2. Scope of the Policy

The personal scope of these Rules extends to: all employees of the Company, natural persons in other legal relationships involving the performance of work (hereinafter collectively referred to as “**Employees**”), and Other Interested Parties.

The material scope of the Regulations extends to:

- organizing and conducting events in accordance with FOM and FIA requirements, with a particular focus on organizing and conducting the Formula 1 Hungarian Grand Prix, as well as other international automobile and motorsport competitions;
- operating and utilizing the racetrack and other facilities owned by the Company;
- organizing and conducting driver training courses (on-road, off-road, motorcycle);
- conducting marketing and retail activities.

The territorial scope of the Regulations extends to the Race Track and leased external areas.

The temporal scope of the Regulations: the “**SUSTAINABILITY MANAGEMENT SYSTEM REGULATIONS**” established by the Chairman and CEO of HSZRT and promulgated by this directive shall enter into force on **April 27, 2026**, at which time the “SUSTAINABILITY MANAGEMENT SYSTEM REGULATIONS” issued on October 30, 2025, shall cease to be in effect. The content of the Policy must be reviewed annually, as well as whenever there are changes to relevant laws and regulations or to the Company’s organizational structure or activities, and must be amended accordingly. The Legal Director shall be responsible for updating the Policy and preparing it for approval. The Chairman and CEO of HSZRT is authorized to issue, amend, and repeal the Policy.

### 1.3. Interpretative Provisions

<b>GLOSSARY</b>
<b>Sustainability:</b> Sustainable development is a process of development or an organizational principle that meets the needs of the present without compromising the ability of future generations to meet their own needs.
<b>System:</b> refers to the Sustainability Management System.
<b>Race Track:</b> refers to the track owned by HSZRT, as well as the areas and facilities necessary for the conduct of events held on the track and suitable for motorized activities, and the entirety of all facilities located within this area, which is situated at 10 Hungaroring út, Mogyoród 2146.
<b>Track:</b> refers to the 4,381-meter-long continuous asphalt strip owned by HSZRT.
<b>FIA:</b> stands for the International Automobile Federation (Fédération Internationale de l'Automobile)
<b>FOM:</b> stands for Formula One Management Limited, the rights holder of the Formula 1 international motor racing series.
<b>UN:</b> stands for the United Nations.
<b>Policy:</b> refers to the Company’s Sustainability and Environmental Policy as currently in effect.

**Other interested parties:** this includes visitors to the Racetrack, partners under contract with HSZRT, as well as their employees, subcontractors, and collaborators present at the Racetrack.

**Management:** the Chairman and CEO, the Deputy CEO, and the directors, or the management as defined in the Company's current Organizational and Operational Regulations.

#### 1.4. Policy

The Chairman and CEO, the Deputy CEO, and the General Counsel responsible for the design, implementation, and operation of the System, as members of the Executive Management, have articulated their commitment to sustainability and environmental protection. HSZRT's commitment is also evidenced by the approval of the document titled Sustainability and Environmental Policy.

Following approval, HSZRT ensures that the Policy is communicated to relevant stakeholders. HSZRT directly provides its employees with access to the Policy and raises awareness of it through documented information.

## II. Chapter 2: SPECIAL PROVISIONS

### 2.1. The HSZRT Environment

#### 2.1.1. Understanding the HSZRT Environment

By introducing, operating, and developing the System, HSZRT has committed itself to creating a system that meets the needs of the present without compromising the ability of future generations to meet their own needs.

This commitment implies that the organization of events may be:

- large-scale;
- temporary;
- not free from social, economic, and environmental impacts;
- the impacts may be positive or negative.

For these reasons, the HSZRT must understand the changes occurring in the external and internal environments and, following this understanding, must adapt its internal and external activities so that its System meets the established criteria.

We must recognize the impact we have on society and understand society's expectations regarding our activities. This understanding is aided by the mandatory regulations in force within the given economic environment, as well as the expectations of the organizations holding the event rights and the FIA, as the international governing body for auto and motorsports, which are set forth as requirements for the HSZRT.

This understanding should facilitate the improvement of the System's processes and, through continuous performance improvement, the achievement of the expected objectives.

#### 2.1.2. Understanding the needs and expectations of stakeholders

HSZRT has identified the key stakeholders and their needs that are relevant to the System, taking into account the System's requirements.

The identification of stakeholders is carried out by the process owners appointed within the System, who hold the following positions:

- Legal Director – Legal Department;
- Chief Financial Officer – Finance Department;
- Portfolio Director – Portfolio Management Department;
- Director of Investments and Operations – Investments and Operations Department.

The following are included in the group of stakeholders relevant to the System:

- HSZRT staff;
- FIA, FOM;
- racing teams participating in events or using the Race Track in other ways;
- event organizer;
- event host;
- staff;
- supply chain subcontractors and suppliers;
- supply chain staff;
- event participants;
- regulatory bodies;

Stakeholders must be divided into two groups:

- internal;
- and external stakeholders.

Understanding the needs and expectations of stakeholders relevant to the System, as reflected in the interconnections between processes, is facilitated by the following categorization:

- the extent of the stakeholders' interests and how much their interests are tied to the HSZRT's decisions and activities. This determines the relevance (the level of importance and significance from the stakeholder's perspective),
- the extent to which individual stakeholders are able to influence the HSZRT's decisions and activities. This constitutes the level of influence, which indicates the significance of the stakeholders—in other words, the magnitude of the risk (as their influence affects the HSZRT's activities).

The process owners listed above identify the stakeholders and their fundamental needs that are important to the System in the stakeholder table.

The practical implementation of the assessment and its methodology are presented in the stakeholder table.

An understanding of the stakeholders and their needs, as well as the results of meeting those needs, are recorded as documented information.

A review of stakeholder requirements is conducted during the management review.

### 2.1.3. The System and Its Processes

The System has mapped out the processes, along with their interactions, that comply with the requirements set forth in the standard.

To this end, the following have been defined:

- the processes that encompass the activities of HSZRT;
- the criteria and methods necessary for the effective operation of the processes, which are required to ensure their effective operation and oversight;
- the resources and their availability;
- responsibilities and authorities;
- the method for analyzing risks and opportunities;
- the method for evaluating processes, including the measures identified to ensure the achievement of planned results;
- measures taken to improve processes.

### 2.1.4. Principles, Objectives, and Values of Sustainable Development

In the course of establishing, implementing, operating, and developing the System, the HSZRT takes into account the tasks and responsibilities arising from international and national sustainability strategies relevant to its area of operation.

In light of these considerations, the HSZRT's strategy defines its sustainability principles, mission statement, and values.

The senior management of the HSZRT defines its sustainability principles by taking into account the Charter of the United Nations, the Fundamental Law of Hungary, the tasks set forth in the national concept



for the transition to sustainability for 2012–2024<sup>1</sup>, and the sustainability-related expectations of the FOM and the FIA.

The fundamental principles defined above must be consistent with the principles set forth in the Fundamental Law. Accordingly:

- The HSZRT undertakes to nurture and preserve our heritage, our unique language, Hungarian culture, the languages and cultures of the nationalities of Hungary, and the natural and man-made values of the Carpathian Basin; it bears responsibility for our descendants, and therefore safeguards the living conditions of future generations through the careful use of our material, intellectual, and natural resources.
- Natural resources, particularly arable land, forests, and water resources, as well as biodiversity—especially native plant and animal species—and cultural values constitute the nation’s common heritage, the protection, maintenance, and preservation of which for future generations is the duty of the state and of everyone.

The President and CEO, Deputy CEO, and Legal Director responsible for the operation of the HSZRT shall review the HSZRT’s sustainability principles, objectives, and mission statement in the event of changes to FIA, FOM, or international or national legal regulations.

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<sup>1</sup> 18/2013. (III. 28.) OGY határozat a Nemzeti Fenntartható Fejlődés Keretstratégiáról

## 2.2. Management Commitment

### 2.2.1. Leadership and Commitment

The CEO and Deputy CEO of HSZRT are committed to the implementation, operation, and development of the System. To this end, taking into account international and national sustainability strategies, they demonstrate their commitment through the following:

- during the implementation of the sustainability management system, they formulated HSZRT's sustainability and environmental policy, which is consistent with HSZRT's strategic direction;
- based on an understanding of and consideration for the Policy, strategic direction, and the needs of significant stakeholders, they have established objectives, which they evaluate and communicate to significant stakeholders;
- they maintain the Policy throughout the operation of the sustainability management system, reviewing and revising it as necessary in parallel with the development of the system;
- the requirements of the System are incorporated into the management system through communication channels and documented information, and compliance with them is required;
- they ensure that the requirements of the System are integrated into event organization and related support processes;
- provide, within reasonable limits, the resources necessary to achieve the objectives set by the HSZRT and the stakeholders;
- effectively communicate the sustainability principles established by the HSZRT both within the organization and to the HSZRT's partners, with the clear intention of shaping and influencing the attitudes of participating stakeholders—including subcontractors and suppliers, as well as users of the Race Track (e.g., racing teams, private individuals);
- raise awareness of the System's requirements by assigning responsibilities and verifying compliance with these requirements;
- define the responsibilities and authorities of employees working within the System, thereby demonstrating how each employee contributes to the System's effectiveness and efficiency;
- assign responsibilities to employees working within the System to ensure that sustainability requirements in the relevant area are enforced;
- develop the System in accordance with the requirements of the standard.

### 2.2.2. System Policy

The Chairman and CEO, the Deputy CEO, and the General Counsel have formulated the HSZRT Policy. The Policy was formulated in accordance with the following principles:

- aligns with HSZRT's activities subject to sustainability requirements;
- provides a framework for the measurable goals set by HSZRT and communicated to HSZRT by key stakeholders;
- expresses a commitment to applying and fulfilling the requirements;
- confirms, in the form of a statement, the development of its System;
- outlines communication with supply chain participants, as well as the expectation and obligation to meet requirements;
- assumes responsibility for future generations;
- takes into account the needs of event participants when formulating policies;
- declares that it will ensure compliance with requirements throughout the entire process, from the concept and planning of events through to their implementation and post-event activities.

The Policy is published as a documented document.

The Policy is reviewed annually as part of the management review and amended as necessary. The Deputy CEO and the General Counsel are responsible for any amendments. The current version of the Policy is continuously published on the HSZRT's official website, with previous versions archived.

### 2.2.3. Organizational roles, responsibilities, and authorities

HSZRT employees are responsible for the work performed in their respective areas and for full compliance with regulations, instructions, and requirements. They are also responsible for immediately reporting any issues identified within the System or related to documentation, and for resolving such issues within the scope of their authority. Employees are also responsible for implementing the provisions of the Policy.

The tasks, responsibilities, and authorities to be performed in each process are set forth in HSZRT's internal regulations, which precisely define the activities, decision-making, implementation, and jurisdictional powers. The specific tasks, responsibilities, and authorities of HSZRT staff members are detailed in the job descriptions developed for each position, which also include the tasks and responsibilities outlined in the System.

The Legal Director is the person designated by Management to be responsible for the implementation, proper operation, and maintenance of the System. In addition, process owners appointed by the various departments support the implementation, operation, and development of the System. The process owners provide support in the following areas:

- identifying and periodically reviewing the needs of key stakeholders;
- reviewing the extent to which the objectives set by the HSZRT and key stakeholders have been met during the period under review, and setting objectives that support progress based on the monitored parameters;
- defining and implementing the tasks, responsible parties, and deadlines necessary to achieve the objectives, in coordination with the Legal Director;
- formulating the requirements for compliance with the System;
- reviewing the status of sustainability-related concepts, plans, implementations, and follow-up activities;
- ensuring the availability of resources;
- identifying non-conformities observed in the System and determining follow-up actions;
- assessing risks and the extent of their changes, and investigating the likelihood of extraordinary risks occurring;
- promoting awareness both within the HSZRT and among those operating in the supply chain;
- maintaining contact with external organizations regarding matters arising from the system.

## 2.3. Planning

### 2.3.1. Analysis of Risks and Opportunities

HSZRT has developed a method for assessing risks and opportunities in order to ensure that:

- the implemented System achieves the intended results;
- the organization can prevent, mitigate, or at least identify undesirable effects;
- the System's continuous improvement is supported.

During the assessment of risks and opportunities, risks or potential impacts and opportunities affecting the HSZRT's activities—arising from the micro- and macro-environment as well as the significant needs of stakeholders—are taken into account.

The assessment of risks and opportunities is recorded in a table designed for this purpose, ensuring that the HSZRT can formulate appropriate measures based on the identified risks.

The following principles apply to risks and opportunities:

- identification of the risk (threat) and its severity on a scale of 1 to 5 (assessment of risk severity based on its impact on the business);
- identification of weaknesses (vulnerabilities) (weaknesses/vulnerabilities associated with a given risk/threat to the organization) and determination of probability and its degree on a scale of 1 to 5 (the probability of the risk occurring, taking into account the weaknesses (vulnerabilities));
- existing controls (the current measures we take to avoid risks) and an assessment of the effectiveness of existing controls on a scale of 1 to 5.

Based on these values and taking into account the established risk tolerance level, it is necessary to formulate measures regarding the specific risk that will help reduce the risk level. With a view to reducing the risk level, the HSZRT considers the following risk management approaches:

- measures taken to avoid risk;
- accepting risk to pursue an opportunity, provided the risk level remains manageable within the HSZRT;
- eliminating the source of risk;
- modifying the vulnerability or the control in place;
- sharing risk;
- retaining risk based on a well-founded decision.

In the case of measures, it must be ensured and defined how the person responsible, as determined by the HSZRT process owner, integrates and implements the actions with respect to the processes and how they evaluate the effectiveness of the measures.

The examination of opportunities in the risk assessment appears as development opportunities through which the processes, the system's efficiency, or its effectiveness can be improved.

Risk assessments must be conducted in the following cases:

- during the restructuring of internal processes;
- in the event of significant changes in legislation affecting internal processes;
- based on experience with subcontractor services used during event organization;
- when taking into account significant changes observed in the field of event organization;
- in the event of significant changes in the needs of stakeholders;
- at least once a year.

The assessment of risks and opportunities must be carried out under the coordination of the designated process owners, with the support of staff members active in the relevant field.

### 2.3.2. Legal and other requirements

HSZRT uses this process to identify legal and other requirements related to its System, to define the measures to be taken in the event of changes to such requirements, and to implement these measures in accordance with the applicable lines of responsibility.

In the case of impacts arising in connection with the System and their assessment, legal and other requirements are identified. Therefore, the process owners are responsible.

### 2.3.3. Setting Goals and Planning How to Achieve Them

In operating the System, the HSZRT sets objectives and formulates measures and programs to ensure that these objectives are met by the specified deadline and by the designated responsible parties. When developing and defining these objectives, the HSZRT takes the following into account:

- changes occurring in the micro- and macro-environments;
- the operating conditions in its micro- and macro-environments;
- legal requirements and other requirements undertaken by the HSZRT;
- changes in the requirements of the FIA, the FOM, and other stakeholders;
- financial capabilities;
- technological capabilities related to the System.

When planning to achieve its objectives, the HSZRT takes the following into account:

- what activities it will undertake and carry out;
- what resources are required for this;
- who is responsible for implementation;
- what the deadline is for completing the activity;
- how it will evaluate effectiveness.

When setting goals, HSZRT focuses on clear wording and clarity. Therefore, goals should be:

- S - specific (the goal should be precise and detailed, not general);
- M - measurable (a metric must be defined to measure progress);
- A - achievable (the goal should be feasible with the given resources and should be challenging);
- R - relevant (the goal should align with the HSZRT's long-term plans and values);
- T - time-bound (a specific deadline should be set).

The Legal Director is responsible for coordinating the formulation and achievement of the goals, with the involvement of process owners.

The Management discusses the developed goals and targets with the Deputy CEO during the management review and, if necessary, in a management meeting. Approval is the responsibility of the Chairman and CEO.

The established objectives and targets must be evaluated during management reviews, taking into account changing circumstances and the extent to which they have been met. The General Counsel may, with the consent of the Deputy CEO, specify a shorter review interval.

### 2.3.4. Identification of system-related factors and assessment of their impact

Up-to-date records of environmental factors and impacts arising from normal and abnormal operations are maintained in the Environmental Factors and Impacts Appendix (see the appendix for a sample) under the coordination of the Legal Director and by the process owners, based on information related to the specific activity. Based on the information provided, the process owners and the Legal Director conduct an

assessment of environmental factors and impacts according to the criteria specified in the Environmental Factors and Impacts Assessment Criteria document. The Legal Director reports the results of the assessment to Management during the management review.

Depending on the results of the assessment, the process owners and the Legal Director make the necessary modifications to the System (e.g., reviewing and modifying documentation and objectives, defining measurement and monitoring tasks, etc.).

The Environmental Policy contains the requirements for measurement and monitoring related to environmental factors.

Environmental factors and impacts are reviewed by process owners and the legal director as needed, but at least once a year, prior to the management review. The review must also be conducted in exceptional cases. These include the following:

- technological changes to the infrastructure;
- the introduction of new machinery or equipment;
- the emergence of new factors related to events;
- a significant change in a given factor;
- investments, track developments;
- the use of new materials or auxiliary materials in infrastructure or operations.

In the event of a change, the procedures described above must be followed.

With regard to investments, events, technologies must be planned and carried out in such a way that they affect the environment as little as possible, reduce the burden on and use of the environment, and do not cause environmental hazards or pollution exceeding the limits set forth in legal requirements, in accordance with the following criteria:

- When establishing a stationary facility that causes air pollution, technologies, processes, and equipment must be implemented, and for the handling (collection, transport) and processing of materials (raw materials, waste) (collection, transport), and processing must be carried out using methods that impose the least burden on the environment (during construction, the provisions of the relevant air quality protection regulation must be taken into account);
- in general—provided that such a definition is available under domestic law—efforts must be made to apply methods consistent with the best available techniques;
- When intending to use a new hazardous substance or mixture, if multiple alternatives are available and technical and economic considerations permit, efforts should be made to use a hazardous substance or mixture with less hazardous properties that is suitable for the intended purpose;
- From a waste management perspective, it is necessary to ensure the prevention of waste generation, the reduction of the quantity and hazardousness of the waste produced, the reuse of waste, its material recovery, and its environmentally sound disposal;
- Consideration of a life-cycle approach, such as:
  - a) service life, maintainability;
  - b) keeping raw materials in circulation in the event they become waste;
  - c) the generation of less polluting waste and the processability of raw materials that have become waste multiple times;
  - d) value for money;
  - e) conscious monitoring of the levels of consumption or use of energy and other natural resources;
  - f) the possibility of defining a system of selection criteria.

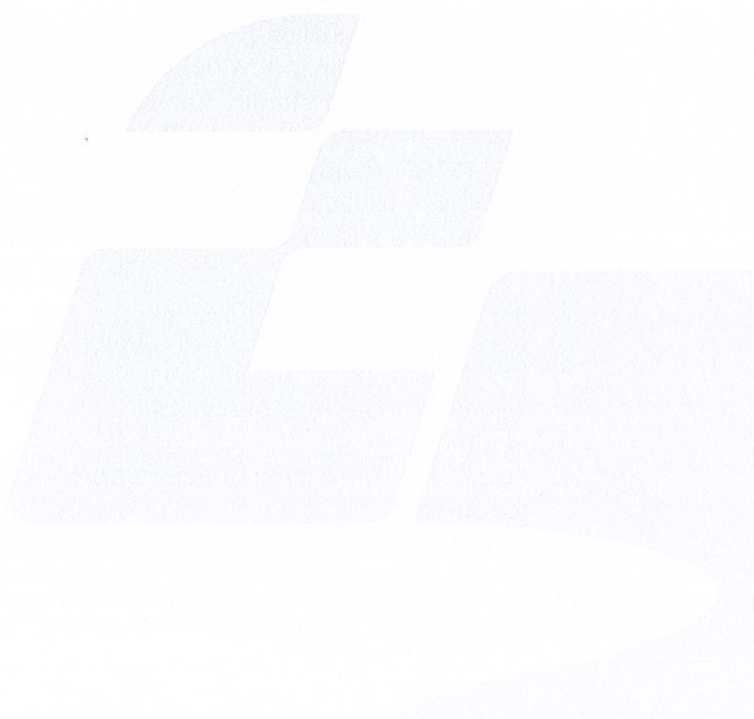
Findings related to the life cycle approach are recorded in the comments section of the environmental factors and impacts assessment.



Environmental factors and impacts that meet the criteria defined by the FIA (8-17) and FOM are listed in a separate column in the assessment.

Based on the assessment, the Legal Director—in consultation with the process owners—determines the necessary measures.

When assessing environmental factors and their impacts, the legal and other requirements applicable to the given factor must be taken into account.



## **2.4. Resources**

With the consent of the entity exercising ownership rights, management selects and establishes the resources necessary for its operations (physical conditions, technical equipment, methods) in such a way that it can fully comply with its contracts, legal requirements, the needs of stakeholders, reduce the impact of its processes on climate change within defined limits, and raise awareness of climate change-related activities.

Requirements regarding resources, their availability, and suitability are regularly reviewed during contract negotiations, through the evaluation of supplier performance, and through periodic assessments of the system.

### **2.4.1. Human Resources, Competence**

It is a fundamental requirement for all employees to be familiar with HSZRT's objectives, the system-level requirements and rules applicable to them, and to possess the professional knowledge and qualifications necessary for their position. HSZRT aims to provide its employees with information regarding event-specific impacts related to waste collection, energy and water use, emergencies, and pollution reduction, so that employees can apply this knowledge consciously. HSZRT places great emphasis on acquiring and maintaining the competencies specified in legal requirements. To this end, it ensures the attainment and continuous maintenance of the necessary competencies through conscious and ongoing training.

For subcontractors and suppliers, as well as users of the Race Track (e.g., racing teams, private individuals), the necessary requirements are set forth in contracts; in exceptional cases, HSZRT trains the relevant subcontractors within its own authority.

The necessary requirements for users of the Race Track (e.g., racing teams, private individuals) are set forth in contracts and in posted informational documents.

The necessary requirements for spectators attending events at the Race Track are set forth in posted informational documents.

In the event of a need to fill a new position or a specific existing position, the recruitment methodology may be selected by the HR specialist in accordance with the decision of management and in line with the position to be filled and current labor market conditions, as follows:

- using the company's own database,
- through an open recruitment process,
- by engaging a recruitment agency (i.e., headhunter),
- through the Employment Department of the Government Office;
- through recommendations or professional networks.

Incoming resumes are pre-screened by the relevant Department and an HR specialist, resulting in a preliminary interview for which specific criteria are established.

The criteria are determined based on the following (which may vary depending on the position):

- practical experience;
- length of service;
- educational background;
- other qualifications;
- abilities and skills (e.g., language proficiency, communication skills);
- suitability for the position.



These competency levels ensure that we always meet the requirements of our activities—including legal requirements.

The criteria will be specified in the job description at a later date by the HR specialist.

The preliminary screening is based on criteria formulated by the relevant Department and the HR specialist, which are determined according to job categories.

Personal interviews are conducted by the relevant Department and the HR specialist. Following the interviews, based on the recommendation of the relevant Department and the HR specialist, the Deputy CEO forwards the approval to the Chairman and CEO.

If a candidate does not possess the required qualifications but has the necessary experience to fill the position, they may be hired for that position with the permission of the Chairman and CEO.

The HR specialist requests copies of certificates from each employee to verify their qualifications, but these copies are not retained in accordance with data protection regulations.

For new employees, the HR specialist requests the following information:

- bank details, bank account number;
- copies of certificates (for presentation purposes only);
- copies of identification documents (for presentation purposes only and to record data required by law);
- certificates issued by the previous employer, with particular regard to sick leave history, suspensions, and the legal status of the previous employer as well as the manner in which the employment relationship was terminated (to comply with the provisions of the Labor Code applicable to publicly owned employers).

The HR specialist handles employees' personal data confidentially and in accordance with data protection laws.

In addition, each employee's personnel file contains an original, approved copy of their employment contract and job description.

The HR specialist completes the employee's personal record form based on the available data and registers the employee through the designated payroll processor.

#### 2.4.2. Employee Training

Upon joining the company, the new employee will be familiarized with the processes and provided with the necessary and sufficient organizational knowledge. The new employee may not begin work without completing the mandatory training on legal requirements (occupational safety and fire safety). Records of this training must be retained in a documented format.

The transfer of knowledge related to sustainability, environmental protection, and other job-specific information is ensured by the Legal Director through the process manager or coordinator of the relevant Directorate. The training record serves as proof of the training. In addition, a record may also be used that confirms the completion of the training within the framework of the documented information.

The effectiveness of the training is verified through tests and the internal audit used in the System.

#### 2.4.3. Planning, implementation, and verification of training programs



Training needs are assessed prior to the preparation of the annual business plan. The assessment follows internal guidelines and the planning guidelines of the entity's controlling shareholder.

The assessment is conducted based on the following principles:

- a proposal from the employee concerned;
- or a proposal from the head of the relevant department;
- or a management proposal arising from the internal needs of the HSZRT.

The HR specialist requests the heads of the Directorates to assess training needs. The HR specialist compiles the Directorates' needs and forwards the consolidated framework to the Deputy CEO.

The necessity of the training must be explained to the Deputy CEO. This is done by the departments and the HR specialist.

In all cases, training begins—in accordance with the Company's current procurement regulations—with the initiation of a procurement order request, which is initiated by the HR specialist. The process is finalized with the approval of the responsible authorizer.

The HR specialist records the planned training sessions in a training plan (see the sample in the appendix). This document serves to track whether a given training session was successfully conducted or not.

To verify the completion of internal training, the training report and other documented information (training log, electronic certificates) are used, while to verify the completion of external training, copies of certificates or, if no certificate is available, information from the designated employee who participated in the training is used.

It is the responsibility of the trainer to assess the effectiveness of internal training sessions. The effectiveness of the training is verified through training records and tests. If the training does not meet the required standards, it must be repeated.

The legal director, in consultation with the process owners, must provide training to the relevant employees regarding current objectives, results, and changes to the system.

The HR specialist shall record the acquired competencies related to the ISO 14001 system and sustainability in a competency register (see the sample in the appendix). To ensure the register remains up-to-date, the process owner is required to provide the necessary information to the HR specialist.

#### 2.4.4. Infrastructure

The Investment and Operations Directorate is responsible for ensuring the infrastructure's compliance with sustainability and environmental protection requirements, as well as for coordinating the necessary inspections and audits. The Director of Investment and Operations is responsible for assigning responsibility for infrastructure components to designated personnel within the Investment and Operations Directorate, as well as for obtaining the necessary permits where required.

## 2.5. Communication

HSZRT has identified the communication channels it uses to communicate requirements and results related to the System, both internally and externally.

In the course of internal and external communication, we determine:

- what the HSZRT will communicate;
- when to communicate;
- with whom to communicate;
- and how to communicate.

We have defined these communications in a communication matrix.

In our communications, we emphasize the following aspects of the System:

- its policies on sustainable development and environmental protection;
- communicating its mission, values, goals, and policies;
- best practices for achieving its goals;
- objectives;
- guidelines;
- presenting and fulfilling environmental performance targets;
- understanding the needs of stakeholders;

The HSZRT emphasizes responsible communication to ensure that, in the case of affected stakeholders, no communication occurs during their activities that misleads the public regarding environmental and social impacts and reality.

### 2.5.1. Development and monitoring of the Annual Communication Plan

The Portfolio Director is responsible for preparing the Annual Communication Plan. The Annual Communication Plan must be prepared annually by November 30 of the year preceding the target year.

The Annual Communication Plan must include the definition of the target audience to be reached, the communication objective and message, the communication channel, the communication format, and the timing/publication of the communication. The Annual Communication Plan must also include the designation of the person responsible for communication, the status of communication, and metrics related to communication.

The Annual Communication Plan must be continuously updated as needed throughout the year; the Portfolio Director is responsible for these updates.

### 2.5.2. Communication and Feedback

In order to ensure that feedback regarding the sustainability management system—which was implemented in alignment with its operations—is handled effectively, HSZRT establishes and operates a structured feedback management system.

The Director of Investment and Operations is responsible for operating the structured feedback management system.

Within the framework of the structured feedback management system, the procedures for handling and responding to incoming inquiries, as well as their documentation and monitoring, must be established.

The HSZRT may receive feedback regarding its sustainability management system—which was introduced in alignment with its activities—either in paper form addressed to the HSZRT’s headquarters or electronically via emails sent to [sustainability@hungaroring.hu](mailto:sustainability@hungaroring.hu). Incoming inquiries must be filed in accordance with the provisions of the HSZRT Document Management Regulations and entered into the registry specified in Annex 5 of the Regulations.

Incoming inquiries must be processed and responded to within 15 (fifteen) business days of receipt, and the fact that a response was provided must also be recorded in the registry specified in Annex 5 of the Regulations.

The continuous monitoring of inquiries and responses related to the HSZRT’s communications activities is the responsibility of the manager in charge of operating the structured feedback management system.

Feedback on inquiries is prepared by the relevant departments based on the subject matter of the inquiry, under the coordination of the Legal Director. The relevant department, with the involvement of the General Counsel, may decide to initiate corrective action, which is documented in accordance with Section 2.7.8. The initiation of corrective action is initiated by the head of the department concerned.

## 2.6. Beszerezés

HSZRT prioritizes environmentally friendly and sustainable procurement when selecting suppliers and subcontractors for products and services in order to support its sustainability goals, taking environmental impacts into account and striving to minimize them.

To this end:

- it aims to reduce its environmental impact;
- it optimizes the use of resources;
- it supports the use of less polluting materials and, in the case of materials that become waste, promotes reuse and recycling;
- applies the principles of the circular economy;
- raises awareness among its suppliers and subcontractors and motivates them to take into account the principles of environmental protection and sustainability.

### 2.6.1. General sustainability objectives and guidelines for the procurement process

In order to achieve the HSZRT's environmental protection and sustainability principles, the following four (4) main general objectives must be taken into account:

- minimizing the environmental impact of purchased products and/or services (air pollution, waste generation, health effects);
- striving to minimize resource consumption – land resource efficiency;
- minimizing the negative impacts of the supply chain, with particular regard to social aspects, which include the following:
  - a) To what extent are suppliers able to meet the HSZRT's requirements while taking sustainability considerations into account;
  - b) To what extent is the distance of material deliveries taken into account;
  - c) how the supplier takes sustainability principles into account in order to minimize negative impacts, and how it can demonstrate this through the definition and verification of specific metrics;
  - d) how the supplier takes these principles into account to ensure equal opportunity and fair treatment;
  - e) that members of the supply chain comply with minimum ethical, human rights, legal, and employment requirements (the HSZRT also includes equal opportunity in this);
  - f) contractual terms and conditions countersigned by both parties.

### 2.6.2. Procurement requirements to be taken into account

Based on the procurement selection method and type specified by the HSZRT, the relevant department responsible for the procurement must take into account the sustainability principles set forth in these Regulations and develop specific sustainability indicators, which the HSZRT shall specify in the contract or purchase order concluded with the supplier or subcontractor based on the selection. The legal director and the staff of the process management department shall provide support for this.

Environmental and sustainability criteria relating to subcontractors and suppliers are set forth in Annex 4. Process owners are responsible for ensuring compliance with these criteria. The General Counsel is responsible for integrating environmental and sustainability criteria into the contract to be concluded.



With regard to sustainability and environmental protection, HSZRT monitors the activities of suppliers and subcontractors to assess their compliance with the sustainability and environmental criteria set forth in the contracts. For suppliers and subcontractors with whom contracts are concluded on an annual basis, HSZRT aims to improve these suppliers' and subcontractors' approach to sustainability and environmental protection.

To foster this mindset, the HSZRT takes or may take the following factors into account:

For services:

- the environmental impact of the service;
- the service's energy requirements and efforts to reduce them;
- waste generated by the service and the reuse and recycling of waste materials;
- efforts to minimize the amount of waste generated;
- the use of sustainable raw materials;
- the environmental aspects of the service;
- the availability of professionals (distance)

For products:

- efforts to minimize the amount of waste generated;
- prioritizing products made from recycled materials;
- the use of sustainable raw materials;
- supply chain distance;
- minimizing packaging or using eco-friendly packaging;
- long-lasting, low-emission products;
- value for money;
- a life-cycle approach;
- reparability;
- the shipping distance of supplied products;
- digital documentation (reducing paper use).

At the organizational level (subcontractor, supplier):

- ISO 14001 certification or other environmental compliance;
- the availability of an ESG report;
- monitoring of environmental performance.

Risks associated with suppliers and subcontractors are documented in the risk assessment in accordance with the provisions of Section 2.3.1.

The registration of suppliers and subcontractors and their evaluation based on the relevant criteria are recorded in documented information.

#### 2.6.3. **Defining, reviewing, and publishing the sustainability requirements included in the request for proposals and the subsequent purchase order and contract**

The defined, reviewed, and approved sustainability criteria shall be incorporated into orders and contracts in accordance with the provisions of Annex 4 to these Regulations.

#### 2.6.4. Review of sustainability criteria to be applied to suppliers and subcontractors

Sustainability considerations are reviewed during the management review, and it is at this stage that the General Counsel initiates changes in consultation with the process owners.

The review may be prompted by the following factors:

- technical and technological advancements;
- new energy-saving methods;
- new materials;
- new trends in energy conservation;
- investment needs;
- changes in the criteria system of interested parties (FIA – FOM and other stakeholders);
- changes in legislation and other requirements.

#### 2.6.5. Assessment and Reporting of Sustainability Criteria

The HSZRT's Legal Director is responsible for compiling performance indicators that meet sustainability and environmental criteria during management reviews. To this end, he or she relies on the support of process owners and the internal auditor.

When summarizing, the following must be taken into account:

- the regulations and requirements of the FIA and FOM;
- legal and other requirements;
- data collected in accordance with HSZRT's internal rules;
- post-event feedback;
- the target value for the specified criterion (which must be comparable and evaluable);
- information provided in an inappropriate format.

The General Counsel is responsible for coordinating the preparation of the sustainability report for the given year's Formula 1 event in accordance with the criteria established to meet FOM's requirements, while supporting the process owners and ensuring that data is submitted by the deadline. Approval of the report is the responsibility of the Chairman and CEO / Deputy CEO in all cases.

The evaluation of the criteria system is included in the input data for the management review. The Legal Director is responsible for this.

## 2.7. Performance Evaluation

### 2.7.1. Monitoring, measurement, and analysis

For the purposes of monitoring, measurement, and analysis, HSZRT has defined:

- the data it intends to measure in order to comply with legal requirements and the requirements and feedback of stakeholders;
- the method for evaluating this data;
- the frequency of measurement, monitoring, and analysis of this data;

These data and the methods used to analyze them ensure that the HSZRT can evaluate the System's performance and efficiency.

When evaluating the System's performance, the HSZRT collects and analyzes data on the following monitoring areas:

- Energy use:
  - gas energy – phased out (HSZRT calculates using data to be published in early 2026);
  - electricity;
  - fuel consumption.
- Water-related use and generation:
  - water use;
  - wastewater generation.
- Waste management
  - Generation, recording, transport, and treatment of non-hazardous waste;
  - Generation, recording, transport, and treatment of hazardous waste.
- Soil and water pollution, emergency protocol;
- Performance data of subcontractors and suppliers used in procurement activities, based on environmental and sustainability criteria;
- Transportation;
- Biodiversity (biological diversity and heritage);
- Noise;
- Air quality protection;
- Carbon (CO<sub>2</sub>) emissions

The HSZRT sets goals based on performance indicators.

The Environmental Policy outlines the methods and responsibilities for monitoring performance indicators.

The HSZRT uses the following measurement and monitoring tools for performance assessments:

- **Energy consumption** – the following measuring devices are listed in the registry:
  - certified meters owned by the service provider;
  - sub-meters, for which HSZRT accepts the results of factory inspections for newly installed meters, and for previously installed meters, a calibration schedule is being planned;

The technical staff member is responsible within the Investment and Operations Directorate.

- **water consumption and production:**
  - Water consumption – measuring devices are listed in the registry
    - Certified meter owned by the service provider;
  - Wastewater production – measuring devices are listed in the registry

- Flow meter on the outlet pipe.

The technical staff member of the Investment and Operations Directorate is responsible.

- **noise protection:**

- Installation of devices for measuring noise levels emitted by racetrack operations at designated locations on the racetrack.

The track operations staff member of the Investment and Operations Directorate is responsible

- **air quality protection:**

- Placing devices to measure NO<sub>x</sub>, SO<sub>x</sub>, and PM emissions from racetrack operations at two locations on the racetrack.

Responsibility lies with the technical staff member in the Investment and Operations Directorate.

Documented information regarding the evaluation of performance and efficiency is available.

Based on the results of the analysis, the HSZRT initiates corrective actions in accordance with Section 2.7.8 of these Regulations.

The HSZRT incorporates the experience gained during corrective actions into its follow-up activities and applies it to the planning and execution of those activities. The process owners and the legal director are responsible for this.

Process owners are required to share the organizational knowledge necessary based on the follow-up activities of the corrective action and must provide information on this to the General Counsel.

The specific tasks of monitoring, measurement, and analysis are set forth in the Environmental Policy.

#### 2.7.2. Assessment of compliance with legal and other requirements

Once a year, prior to the management review, the HSZRT conducts an assessment of compliance with legal and other requirements. The basis for these legal and other requirements consists of the legal and other requirements identified in relation to environmental protection, which also include the requirements of interested parties.

In the event of non-compliance with legal and other requirements, actions must be taken to achieve compliance.

Documented information regarding the assessment is available.

#### 2.7.3. Internal Audit

To verify the effective operation of the System, an internal audit is conducted once a year as follows.

The dates of the internal audits and the auditors conducting the activity (for the following year) shall be determined by the Legal Director responsible for coordinating the System in the internal audit plan constituting Annex 2 to these Regulations. All elements of the System must be examined in the internal audit plan.

An internal audit may be conducted by a person who:

- is proficient in auditing methods;



- is familiar with the requirements for internal audits specified in this chapter, the applicable supporting documents and their use, and has demonstrated their knowledge and ability to apply them through an examination.

Auditors may not audit their own work!

Prior to conducting the audit, the legal director will coordinate a specific date and time with the designated auditor and the responsible personnel participating in the audit.

The purpose of conducting internal audits is to ensure compliance with standards and other supplementary requirements.

In all cases, the audits are based on the requirements set forth in this Policy, FIA and FOM regulations, and other documents. Auditors record the audit questions, observations, and findings on a checklist. The auditor records any deficiencies identified during the audit on a non-conformity sheet, striving to determine the possible cause of the problem as well. After the audit, the checklist and the non-conformities are sent electronically to the Legal Director.

Identifying the problem/non-conformity and noting the cause of the problem/non-conformity on the non-conformity report is the responsibility of the person who identified the problem/non-conformity. When a problem/non-conformity arises, corrective and/or corrective action is taken.

Verifying the effectiveness of the corrective and/or corrective actions taken, and, if necessary, determining new measures—with the involvement of those concerned—is the responsibility of the person who recorded the corrective and/or corrective actions on the nonconformity report. Corrective and/or corrective actions may only be closed out if the measures taken are sufficiently effective.

#### 2.7.4. **Management review**

An assessment of the System's overall operation is conducted at least once a year under the leadership of the Deputy CEO and with the support of the General Counsel.

**The following HSZRT staff members participate in the review:**

- Chairman and CEO;
- Deputy CEO;
- Portfolio Director;
- Finance Director;
- Legal Director;
- Investment and Operations Director;
- other ad hoc invitees.

The General Counsel shall prepare a report on the review. The report shall include an assessment of each item covered by the review, the specific measures deemed necessary, the persons responsible for implementing them, and the deadlines for implementation. The report must specifically highlight the assessment of the fulfillment of the prescribed objectives, as well as the evaluation of the System's suitability and effectiveness. The implementation of the specified measures is supervised by the General Counsel responsible for the relevant area. In cases involving multiple areas, reports are submitted to the General Counsel responsible for the System's suitability with the agreement of the heads of the relevant departments.

#### 2.7.5. Input data for the inspection

The agenda for the management review includes the following:

- the status of actions identified during the previous management review;
- changes in external and internal factors that are relevant to the system;
- compliance with regulatory requirements and an assessment thereof;
- information and trends regarding the system's performance and effectiveness:
  - a) nonconformities and corrective actions;
  - b) results of monitoring and measurement evaluations;
  - c) results of audits;
- communication with significant stakeholders and changes in stakeholder expectations;
- the extent to which objectives have been met;
- audit results and the status of corrective and preventive actions;
- the adequacy of resources;
- the effectiveness of measures taken regarding risks and opportunities;
- improvements and opportunities for continuous improvement.

#### 2.7.6. Output data from the inspection

Based on the information and reports presented during the review, the participants decide on the necessary improvements and tasks to be carried out. The measures identified relate to the following:

- improving system processes and identifying opportunities for development;
- requirements for system changes;
- securing and developing resources.

#### 2.7.7. Development

HSZRT is committed to the continuous improvement of its processes, alongside the effective and cost-efficient application of sustainability and environmental protection principles. To improve its processes, HSZRT uses the results of process measurement and analysis, risk and opportunity assessments, changes in the significant requirements of interested parties, and changes in internal and external factors.

#### 2.7.8. Nonconformity and corrective action

In the event of non-conformities identified during the System review, the procedures described in the internal audit section must be followed. This includes non-conformities reported by stakeholders and regulatory authorities. In such cases, the HSZRT will take corrective action to address and rectify the issue.

Following the response:

It must be assessed whether action is needed to eliminate the causes of the non-compliance, in order to prevent it from recurring elsewhere. To this end:

- the non-compliance is reviewed and analyzed;
- the cause of the non-compliance is determined;
- it is examined whether similar non-compliances may exist.

Based on the above:

- the specified action is implemented,
- the effectiveness of the corrective action is reviewed;
- risks and opportunities are updated as necessary;
- the necessary changes are incorporated into the System documentation.

Corrective actions must or may be initiated based on the following information:

- nonconformities (nonconformity reports, problem reports, notifications regarding individual and recurring problems)
- stakeholder comments, regulatory notifications, internal reports, measurement and monitoring results;
- nonconformities related to the System (in audit reports)
- nonconformities related to legal requirements.

Corrective action may be initiated by any employee of HSZRT.

The legal director is responsible for ordering corrective actions in all cases, while process owners are responsible for overseeing their implementation. Information regarding corrective actions must be documented on the non-conformity report, which must be completed in accordance with the following steps:

- identification and description of the non-conformity;
- immediate investigation and recording of the nonconformity and its causes;
- action to eliminate the nonconformity and its cause;
- ordering, implementing, and verifying the effectiveness and efficiency of the action.

The legal director reports on the completion of corrective actions during the management review.

Documented information regarding the corrective action must be retained.

### III. Chapter 3: CLOSING PROVISIONS

The President and CEO of HSZRT is required to ensure that all HSZRT employees become familiar with the Policy without delay and accept it as binding upon themselves by notifying the employee via email following the signing (acceptance) of the Policy, providing the link to the Policy within HSZRT's internal network.

All current internal policies, including this Policy, are available to every HSZRT Employee in HSZRT's electronic folder and in printed form at the Secretariat's office at HSZRT's headquarters.


The Chairman and CEO shall ensure that all Employees act in accordance with the rules set forth in these Regulations in the course of their duties. To this end, in addition to the foregoing, the Chairman and CEO may request the Deputy CEO to hold a meeting at which the Deputy CEO shall explain the Code to the regional managers and directors (hereinafter: "Director"). The directors are then required to verbally present the Policy to the Employees under their supervision.

New employees joining after the Policy takes effect must be briefed on its contents by the relevant director.

This Policy will be reviewed in the event of amendments to the relevant laws and regulations.

## IV. Chapter 3: ANNEXES


ANNEX 1.

 <b>KÉPZÉSI JEGYZŐKÖNYV / TRAINING RECORD</b>
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Képzés témái, vagy hivatkozott tematika / Training topics or related subjects:	Előadó(k) / Speaker(s):
Képzés ideje / Training period:	

Sorszám / Nr	Résztevő neve / Participant name	Résztevő munkaköre / Participant Job title	Aláírás / Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			


## ANNEX 2.

		<b>AUDIT PLAN / AUDIT TERV</b> Period/ Időszak: 20__ -- 20__ year /év		
Number / Sorszá	Revised requirement / Felülvizsgált terület(ek)	Scheduled time / Tervezett időpont	Auditors / Auditor(ok)	Evaluation / Értékelés
1.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
2.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
3.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
4.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
5.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
6.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
7.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
8.				Audit completed / Audit teljesítve <input type="checkbox"/> Closed / Lezárva <input type="checkbox"/>
Kelt. / Date:		Készítette / Created by:		
Dátum / Date:		Jóváhagyta / Approved:		

## ANNEX 3.

		<b>BELSŐ AUDIT ELLENŐRZÉSI LISTA / Internal audit Checklist</b>	
Audit sorszáma / Audit number:		Vizsgált terület / Audit scope:	Érintett felelős (vezető) Responsible employee:
Hivat. szám / Number	Ellenőrző kérdések / Check questions	Megállapítások / Objective evidence	Megfelelt/ NMJ szám / Conformity / Nonconformity
Készítette / Made by:		Dátum / Date:	

## ANNEX 5.

		Structured feedback management monitoring system / Strukturált visszajelzés-kezelési monitoring rendszer*					
Nr. / Sorszám	Reference number of the incoming inquiry / Beérkező megkeresés kártyaszáma	Subject of the incoming inquiry / Beérkező megkeresés tárgya	Time of receipt of the inquiry / Befogadás beérkezési ideje	Identifying information of the sender / Megkeresést küldő azonosító adatai **		Department responsible for responding / Válaszadásért felelős szakterület	Date of response / Válaszadás dátuma
				Name / Név	Email address - addressa / Email cím - levelezés cím		
1.							
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19.							
20.							

\*A record of feedback regarding the sustainability management system implemented by HUNGARORING Sport Zrt. (HSZRT) in line with its operations. The register includes both inquiries sent in paper form to HSZRT's headquarters and those sent electronically to the email address [sustainability@hungaroring.hu](mailto:sustainability@hungaroring.hu), as well as the handling of such inquiries. / A HUNGARORING Sport Zrt. (HSZRT) tevékenységéhez illeszkedően bevezetett fenntarthatóság irányítási rendszerével kapcsolatos visszajelzések nyilvántartás. A nyilvántartás tartalmazza egyrészt a papír alapon a HSZRT székhelyére címezve, másrészt az elektronikus úton a [sustainability@hungaroring.hu](mailto:sustainability@hungaroring.hu) e-mail címre megküldött megkereséseket és azok kezelését.

\*\*The personal data provided by users is processed in accordance with the provisions of the GDPR. The relevant privacy policy is available at the following link: <https://hungaroring.hu/site/hu/informacio/dokumentumok> / A megkeresők által megadott személyes adatok kezelése a GDPR rendelkezéseivel összhangban történik. Az erre vonatkozó adatkezelési tájékoztató az alábbi oldalon érhető el: <https://hungaroring.hu/site/hu/informacio/dokumentumok>





