

# Announcement of OPUS GLOBAL Public Limited Company regarding the payment of dividend for the financial year 2023

The General Meeting of OPUS GLOBAL Public Limited Company (hereinafter referred to as the "Company") - pursuant to point 9.2. subpoint g) of the Articles of Association — has decided on 24 April 2024 by the resolution 2/2024 (IV.24.) of the General Meeting (hereinafter referred to as the "Resolution") to pay a dividend of HUF 6 733 439 250 to the shareholders of the Company.

According to the **Resolution**, the payment of dividend will commence on **17 June 2024** (starting day of the dividend payment).

The Board of Directors of the **Company** - as required by point 7.4 of the Articles of Association - will carry out a shareholder identification prior to the payment of the dividend, based on the data of **6 June 2024** (Record Date). The last day of trading on the Budapest Stock Exchange for shares entitled to the dividend for the financial year 2023 will be **4 June 2024** in case of T+2 days settlement (ex-coupon day: **5 June 2024**). Shareholders (natural persons and legal entities) will be entitled to receive the dividend if they own OPUS GLOBAL Plc. shares at the Record Date, and their account keeper has requested that the shareholder be recorded in the Company Share Register.

Shareholders must collect the dividend within 60 (sixty) days from the starting day of the dividend payment. Shareholders will remain entitled to receive the dividend within a limited five-year period (set by the statute of limitation) beginning at the starting day of the dividend payment. The Company is not obliged to pay any interest on dividends paid after 17 June 2024.

As provided in point 17.4 of the Articles of Association, the Company does not take into account the dividend payable on the Company's own shares when determining the dividend to which shareholders are entitled. The amount of the gross dividend payable to a shareholder is calculated by multiplying the number of shares held by the shareholder by the gross Dividend Per Share. The gross Dividend Per Share will be announced in a separate announcement by the Company until 3 June 2024.

KELER Ltd. (70-72 Rákóczi Road, Budapest, HU-1074) acts as the agent of the Company for the payment of dividend according to the details provided by the investment service provider managing the account of the shareholder.

## 1. Process of dividend payment:

In respect of shareholders holding their shares in a security account with a Hungarian account keeper, the dividend will be transferred to the bank account attached to the security account held at the account keeper or to the personal bank account of the shareholder from 17 June 2024, if the above mentioned account keeper has transferred all adequate data suitable for identification of the shareholder in the requested form to KELER Ltd.

If the account keeper inadequately identifies the owner of the respective shares by the given Record Date, the account keeper may finish the identification process later, according to KELER Ltd.'s General Business Rules. Having obtained the missing or supplementary information, KELER Ltd. determines the net dividend payable and transfers it to the account of the shareholder at its account keeper. Please note that in such cases KELER Ltd. executes supplementary transfers only once a month which shall not be considered as late payment. The Company therefore kindly asks all shareholders to request their respective account keepers to perform the said shareholders identification appropriately and in a timely manner, and in case of doubt they should check whether the account keeper has all data required for the data to be supplied to KELER Ltd. The Company and KELER Ltd. do not undertake any liability for late dividend payments arising from the late, incomplete, unsuitable or missing information from the shareholder or its account keeper.

On behalf of the Company KELER Ltd. will issue and send to the shareholders by post a tax certificate on the dividends paid on the shares for the year 2024 and the amount of tax deducted. The dividends paid and tax advances deducted must be included in the individual's personal income tax return in the light of the certificate received. Under the Section 5 (3) of the Act LII of 2018 on the Social Contribution Tax, the dividend income paid is not subject to social contribution tax because it is "the yield of a security listed on a stock exchange operating in any Member State of the European Economic Area and qualifying as a recognised (regulated) market under the Act on Capital Markets, which is classified as a dividend (dividend advance) under the law of that Member State".

## 2. We kindly call the attention of the shareholders to the following:

For private individual shareholders having Hungarian domicile the dividend is payable only if they provide their surname and first name, surname and first name at birth, Tax ID number, date of birth and address, via their account keeper. If there is any lack of the above mentioned personal data, the dividend cannot be paid under the legal provisions. When the above mentioned data has been provided, the dividend will be paid out after the deduction of 15% personal income tax, in compliance with the provisions of Sections 66 and 8 of Act CXVII of 1995 on Personal Income Tax ("Act on Personal Income Tax").

For legal entity shareholders having Hungarian domicile the dividend is payable only if its name, registered seat and tax number or registration number (in particular for investment funds) are provided via the account keeper. In this case the dividend is paid without any tax deduction.

For private individual shareholders having foreign domicile the dividend is payable only if their name, address, date of birth, place of birth, nationality, tax identification number issued by the Hungarian tax authority or the identification number established in the state of residence, and (if not having a registered residence in Hungary in accordance with Act CXXII of 2019) proof of non-resident status are provided by their account keeper. When the above-mentioned data has been provided, the dividend will be paid out after the deduction of 15% personal income tax, in compliance with the provisions of Sections 66 and 8 of Act on Personal Income Tax. If a foreign domiciled individual shareholder intends to receive its dividend through application of a preferred tax rate in accordance with inter-state treaties on avoidance of double taxation, such shareholder is obliged to submit to the Issuer Department of KELER Ltd. (address: 70-72 Rákóczi Road, Budapest, HU-1074, Office building R-70) until 6 June 2024 all the documents specified in Annex 7 to the Act on Personal Income Tax. We kindly remind the shareholders and the account keepers that the certificates of residency issued by foreign tax authorities regarding the tax year 2024 will be acceptable in English, in Hungarian professional translation or a copy of one of them. If a certificate of beneficial ownership is also required by the treaty on avoidance of double taxation, this certificate shall also be translated into Hungarian by a professional translator. The certificate of beneficial ownership can also be issued in Hungarian. If the shareholder would like to receive the dividend with preferred taxation, but fails to submit the required documents within the deadline, until 6 June 2024 the shareholder may request in writing to withhold the dividend until the arrival of the documents.

If a foreign domiciled individual shareholder has the documents specified in Annex 7 to the Act on Personal Income Tax and there is an inter-state treaty on avoidance of double taxation based on which a preferential tax rate can be used, but the shareholder fails to submit the documents to KELER Ltd. (or to request to withhold the dividend until the arrival of the documents) by 6 June 2024 and therefore receives dividend after deduction 15% income tax, they may apply to the Significant Taxpayers' Office (in Hungarian: "Kiemelt Adózók Igazgatósága") of the National Tax and Customs Administration ("NAV") of Hungary and claim back the difference between the 15% and the preferential tax rate. The tax authority shall remit the amount of such tax difference to the payment account specified by the foreign domiciled individual shareholder (Section 4 of Annex 7 to the Act on Personal Income Tax).

For legal entity shareholders having foreign domicile the dividend is payable only if its name and registered seat are provided via the account keeper and it can be unequivocally established that the shareholder is a legal entity having foreign domicile. In this case the dividend will be paid without any tax deduction.

For entities represented by a Nominee, as a general rule 15% tax will be deducted from the dividend. If the account keeper of the nominee specifies in the course of the recording process (shareholder identification process) the number of shares held by private individual shareholders and the number of shares held by legal entities (not private individuals) from the total number of shares represented by the nominee, then the dividends will be paid after applying the relevant tax rate. In case of legal entity shareholders, no tax will be deducted from

the payable dividends. In case of private individual shareholders, personal income tax of 15% will be deducted from the payable dividends.

The Nominee is obliged to make a statement and provide detailed data from private individuals having foreign domicile (pursuant to Section 8 of Annex 7 to the Act on Personal Income Tax) to KELER Ltd. acting as agent on behalf of the Company until the deadline specified in the Act. If the shares represented by the nominee are owned by foreign domiciled individual shareholders who intend to receive their dividends through the application of a preferred tax rate, then those shareholders should be recorded separately in the course of the recording process and the provisions detailed above in the paragraph starting with "For private individual shareholders having foreign domicile" shall apply for them.

# In case of shares being held on long term investment account (in Hungarian: 'Tartós Befektetési Számla')

In case of shares held by domestic and foreign private individuals on long term investment account, no tax will be deducted from the dividends (pursuant to Section 67/B (6) c) to the Act on Personal Income Tax) if the dividend is transferred to the cash account linked to long term investment account. Simultaneously with claiming the dividend, account keepers are required to indicate to KELER Ltd. acting as agent in the dividend payment on behalf of the Company, that shares are held on long term investment account, and the dividend to be paid will be registered in deposit, otherwise the dividends will be paid after deducting a personal income tax of 15%.

### 3. Certificate of the paying agent (tax certificate)

On behalf of the Company KELER Ltd. will issue and distribute a certificate the to shareholders receiving dividends, in the case of private individuals by 31 January 2025 at the latest. In the case of a deferred payment (i.e. after the year 2024), the tax certificate will be issued by KELER Ltd. on behalf of the Company no later than 31 January of the year following the year of the payment.

#### 4. Others

For further information on dividend payments, please contact

- the Investor Relations Officer of the Company (<a href="mailto:hegyvari.david@opusglobal.hu">hegyvari.david@opusglobal.hu</a>; +36 1 433 0701) or
- KELER Ltd. (70-72 Rákóczi Road, Budapest, HU-1074; kelertesem@keler.hu)

23<sup>rd</sup> of May 2024, Budapest

OPUS GLOBAL
Public Limited Company