DOCUMENT CONTAINING THE INFORMATION SET OUT IN ANNEX IX TO THE PROSPECTUS REGULATION, PURSUANT TO ARTICLE 1(5), POINT BA) OF REGULATION (EU) 2017/1129 (PROSPECTUS REGULATION) OF AKKO INVEST PUBLIC LIMITED COMPANY

relating to the admission to trading on the regulated market of the Budapest Stock Exchange of 29,839,512 new "C" series ordinary shares resulting from the conversion of "D" series shares into "C" series ordinary shares

Dated: 25 November, 2026.

This document (the "**Document**") has been prepared pursuant to Article 1(5), point ba), point (iii) of the Prospectus Regulation and Annex IX thereto by **AKKO Invest Public Limited Company** (company registration number: 01-10-140179; registered office: 1117 Budapest, Szerémi út 4; the "**Issuer**"), in connection with the admission to trading on the regulated market operated by Budapest Stock Exchange (the "**BSE**") of 29,839,512 new "C" series ordinary shares, each with a nominal value of HUF 25 (the "**New Shares**"), to be created through the conversion (the "**Conversion**") of 7,459,878 "D" series shares issued by the Issuer, each with a nominal value of HUF 100, which have not been admitted to trading on any stock exchange.

Following the Conversion and their admission to trading on the BSE, the New Shares will belong to the same series as the "C" series ordinary shares already in circulation, will be fungible with them, and will carry the same rights as the C-series ordinary shares already in circulation. The Conversion does not constitute a public offer of securities and does not involve the provision of any new cash or non-cash contribution. As a result of the Conversion, the Issuer's subscribed capital remains unchanged and the number of votes does not change; only the composition of the share capital by share series is modified.

The Issuer declares that the conditions set out in Article 1(5), point (ba) of the Prospectus Regulation are met: (i) the Issuer's "C" series ordinary shares have been continuously admitted to trading on the regulated market of the BSE for at least 18 months prior to the admission of the New Shares; (ii) the New Shares are not created in connection with a takeover by way of an exchange offer, or in connection with a merger or division; and (iii) the Issuer is not subject to restructuring or insolvency proceedings. The Issuer has filed the Document in electronic form with the Hungarian National Bank ("**MNB**") and, at the same time, has made it available to the public in the manner set out in Article 21(2) of the Prospectus Regulation.

The Document does not constitute a prospectus within the meaning of the Prospectus Regulation; accordingly, it was not reviewed or approved by the competent authority prior to its publication. Furthermore, the Document does not contain a comprehensive description of the Issuer or of the shares. Any investment decision should be based on the totality of the information published by the Issuer from time to time or on an ongoing basis or disclosed in accordance with applicable laws and regulations.

The Issuer is not subject to an obligation to supplement the Document pursuant to Article 23 of the Prospectus Regulation.

The Document has been prepared in Hungarian and English. The Hungarian version is the official version. In the event of any discrepancy between the English and the Hungarian versions, the Hungarian text shall prevail.

I. INFORMATION ON THE ISSUER

The Issuer is AKKO Invest Public Limited Company, a public company limited by shares incorporated and registered in Hungary. The Issuer's LEI code is 529900ZJTFAIEDHW9U42. The Issuer's website is: https://akkoinvest.hu/

II. RESPONSIBILITY STATEMENT

The Board of Directors of the Issuer is responsible for the preparation of the Document. The members of the Board of Directors declare that they accept responsibility for the Document and for the information contained therein, and that, to the best of their knowledge, the information contained in the Document is in accordance with the facts and the Document makes no omission likely to affect its import.

III. COMPETENT AUTHORITY

Pursuant to Article 20 of the Prospectus Regulation, the competent authority in Hungary is the Hungarian National Bank (hereinafter: "**MNB**"; website: www.mnb.hu).

The Issuer declares that, within the meaning of the Prospectus Regulation, the Document does not constitute a prospectus. The Issuer declares that the MNB, as the competent authority of the Member State in which the Issuer has its registered office, has neither reviewed nor approved the Document.

IV. COMPLIANCE WITH REPORTING AND DISCLOSURE OBLIGATIONS

The Issuer declares that, throughout the entire period during which its "C" series ordinary shares have been admitted to trading on the regulated market, it has continuously complied with its reporting and disclosure obligations, including those set out in Directive 2004/109/EC ("**Transparency Directive**") and Regulation (EU) No 596/2014 ("**MAR**"). In carrying out the Conversion and the admission to trading on the BSE, the Issuer has not appointed an investment service provider; accordingly, the provisions of Delegated Regulation (EU) 2017/565 are not applicable.

V. NOTICE ON REGULATED INFORMATION

Regulated information published by the Issuer pursuant to its ongoing disclosure obligations is available at the following locations:

Issuer's website	https://akkoinvest.hu/kozzetetelek/
BSE website	https://bet.hu/
Disclosure system operated by the MNB	https://kozzetetelek.mnb.hu/nyilvanos_ertekpapir_kibocsato

The Issuer's most recent prospectus approved by the competent authority is the consolidated prospectus dated 16 July 2019, approved by MNB decision No. H-KE-III-470/2019 of 19 July 2019. That prospectus is no longer valid and is available at the following locations:

Issuer's website	https://akkoinvest.hu/wp-content/uploads/2020/02/2019.07.21-Osszevont-tajekoztato-final.pdf
BSE website	https://bet.hu/site/newkib/hu/2019.07./AKKO_Invest_-_Hirdetmeny_es_Kibocsatasi_Tajekoztato_128267180
Disclosure system operated by the MNB	https://kozzetetelek.mnb.hu/downloadkozzetetel?id=554398&did=K194685/2019

VI. STATEMENT REGARDING INSIDE INFORMATION

Section VI of Annex IX to the Prospectus Regulation applies only in the case of a public offer of securities. The Document relates solely to the admission to trading on the BSE regulated market of the New Shares resulting from the Conversion; no public offer of the New Shares within the meaning of the Prospectus Regulation takes place.

VII. REASON FOR THE ISSUANCE AND USE OF PROCEEDS

Pursuant to Section 6.3 of the Issuer's Articles of Association, the holder of "D" series shares, which are not admitted to trading on a regulated market, is entitled, by way of a declaration addressed to the Board of Directors, to request in exchange for the "D" series shares it holds "C" series ordinary shares, which are admitted to trading on a regulated market, at a ratio of 1 "D" series share to 4 "C" series ordinary shares. The Board of Directors decides on the Conversion within 15 days of receiving the shareholder's declaration.

On 13 November 2026, the holder of the "D" series shares, MEVINVEST Vagyonkezelő Kft. (MEVINVEST Asset Management Ltd.), submitted a declaration to the Issuer's Board of Directors pursuant to Section 6.3 of the Articles of Association, requesting the conversion of all of the 7,459,878 "D" series shares it holds into "C" series ordinary shares. The Board of Directors approved the Conversion by its resolution No. 1/2026 (XI.25.).

Under the Conversion, 29,839,512 "C" series ordinary shares, each with a nominal value of HUF 25, will be created in place of 7,459,878 "D" series shares, each with a nominal value of HUF 100. Upon full completion of the Conversion, the number of "D" series shares will be reduced to zero, and the New Shares will belong to the same series as the "C" series ordinary shares already in circulation.

The purpose of the Conversion is the exercise by the holder of the "D" series shares of the conversion right granted under the Articles of Association, and the admission to trading of the resulting New Shares on the BSE regulated market. The Conversion does not involve an increase in the Issuer's subscribed capital, and no consideration is paid to the Issuer; accordingly, no issue proceeds arise in connection with the Conversion.

VIII. RISK FACTORS SPECIFIC TO THE ISSUER

In accordance with Annex IX to the Prospectus Regulation, the risk factors below include only those risks which the Issuer considers material and specific to its business. The Issuer may be continuously affected by a wide range of internal and external factors, events or developments that may have a significant impact on the achievement of its financial and non-financial objectives. The risk factors below are based on information and estimates available at the date of this Document. When making investment decisions, investors should consider all risk factors together. The risk factors are presented in descending order of materiality as estimated by the Issuer (taking into account the probability of occurrence and the expected magnitude of the negative impact).

Macroeconomic risks

The results of the Issuer and its subsidiaries (the "**AKKO Group**") depend significantly on the Hungarian and international macroeconomic environment. Almost all revenues of the AKKO Group arise in Hungary; accordingly, its performance is affected in particular by domestic economic growth, the exchange rate of the forint, domestic inflation and interest rate levels, and the development of domestic investment activity. A slowdown in economic growth, recessionary processes, a high inflationary environment, rising interest rates, rising energy prices or geopolitical conflicts may adversely affect the investment propensity of economic actors, the profitability of businesses, and demand for real estate and construction services.

A deterioration of the macroeconomic environment may reduce the investment and leasing activity of the AKKO Group's clients, increase non-payment risks, and indirectly have a negative impact on the value of the properties it owns and on its financing options.

General real estate market risks

A significant part of the revenues of the AKKO Group derives from activities directly or indirectly related to the real estate market. Changes in real estate demand and supply, trends in the office and commercial real estate markets, the development of rental price levels, and changes in vacancy rates may materially affect the results of the AKKO Group.

A decline in economic activity or a fall in market participants' space requirements may reduce the lettability and market value of properties. Negative processes arising from real estate market cycles may adversely affect the return on real estate development projects, the valuation of investment properties, and development activity. If these risks materialise, they may have an adverse effect on the Issuer's financial position, operating results and future growth prospects.

Risks of facility management (FM) activities

The Issuer's principal subsidiary, NEO Property Services Zrt., carries out general contracting, facility management (FM), property management (PM) and other integrated real estate services.

The profitability of FM activities depends heavily on the availability of labour and on the performance of suppliers and subcontractors. Labour shortages, rising wage costs, rising energy prices or unfavourable renegotiation of service contracts may reduce the profitability of these business lines. In addition, the loss of major clients, or contract terminations resulting from a deterioration in service quality, may have a negative impact on revenues and on earnings capacity. Strong competition in the facility management market may also exert pressure on prices, which may adversely affect future profitability.

Risks of high-rise construction activities

The implementation of high-rise construction projects entails a number of risks which may lie outside the direct control of the Issuer or of the companies participating in the project. These include in particular significant fluctuations in construction material prices, supply chain disruptions, shortages of skilled labour, prolonged official permitting procedures, and inadequate performance by subcontractors.

Increases in construction costs or delays in project schedules may result in a reduction of contractual margins and, in certain cases, in loss-making project performance. In addition, warranty claims, technical defects or other construction problems may cause further costs. If these risks materialise, they may adversely affect the profitability, liquidity and market reputation of the AKKO Group.

Risks of the investment property market

The value of the AKKO Group's property investments depends on real estate market yield levels, the interest rate environment and investor demand. Rising market yields may reduce the value of properties, while an unfavourable investor sentiment may restrict sale or refinancing options.

A decline in the book value and market value of properties may have a negative effect on the Issuer's balance sheet, equity and financing ratios. An unfavourable development of the investment property market may delay the realisation of certain investments or result in returns falling short of planned levels, which may impair the Issuer's future financial performance and its ability to create shareholder value.

Labour market and operational risks

In particular, certain business lines of NEO Property Services Zrt., namely facility management and general contracting, require substantial labour input. Securing, retaining and replacing adequately qualified and experienced staff is therefore an essential factor for operations and profitability. Labour shortages, rising wage costs, high staff turnover and the loss of key employees may increase operating costs, reduce delivery capacity, and make it difficult to provide services at an adequate standard. Difficulties in recruiting staff may lead to delays, additional costs and a decline in project profitability.

Due to the concentration of customers on the client side of the AKKO Group, particularly in relation to the high-rise construction activity started by NEO Property Services Zrt. a few years ago, changes in the creditworthiness and business activity of certain business partners may have a significant impact on the profitability of the group. A deterioration in the solvency of business partners may also increase the risk of receivables and bad debt losses.

Legal and regulatory risks

Numerous statutory requirements, requirements imposed by public authorities, licensing conditions and contractual obligations apply to the activities of the AKKO Group. Changes in the regulatory environment, the introduction of new compliance obligations, differences in how the authorities interpret existing provisions may increase operating costs and administrative burdens. Ensuring compliance with legal requirements, and the tightening of environmental, energy efficiency and sustainability requirements and ESG regulation, may require additional resources and process development, and may entail further investments, upgrades and higher operating costs in relation to the property portfolio owned by the AKKO Group.

Financing risks, in particular regarding the NHP loan

The Issuer and its subsidiaries hold loan portfolios in the course of financing their operations and investments; a material element thereof is financing linked to the Magyar Nemzeti Bank's Growth Credit Programme (Növekedési Hitelprogram, "NHP"). The availability of adequate bank guarantee facilities is also of key importance for the profitable operation of NEO Property Services Zrt.

Financing risks include refinancing risk, possible breaches of financial covenants set out in loan agreements, the narrowing of sources of credit, and the increased cost of future financing. Loan agreements typically contain security obligations, undertakings relating to financial ratios, and a requirement for lender consent upon material changes to the Issuer's structure, ownership or activities, which may restrict the Issuer's strategic freedom of action. If the Issuer or any of its subsidiaries were unable to meet its obligations under loan agreements, this may result in lenders exercising their contractual rights, including, where applicable, demanding immediate repayment.

Although NHP financing provides more favourable conditions than market financing, the existence of the loan portfolio may in itself entail liquidity and financing risks. The fixed interest rate of the NHP loan provides protection during its term against rising interest rates; however, should refinancing be required after maturity, it would presumably take place at a higher financing cost, based on the market conditions prevailing at that time. The materialisation of these risks may adversely affect the Issuer's liquidity position, financial flexibility and the implementation of its growth strategy.

Information technology and cybersecurity risks

The operations of the Group, in particular its building operations, building automation/control, and energy services, rely significantly on information technology and building automation systems. Failures of IT systems, cyberattacks or data loss may cause service interruptions, claims for contractual penalties and damages, data protection breaches and reputational damage. NEO Property Services Zrt. is subject to the domestic cybersecurity regulation implementing the NIS2 Directive; compliance therewith, including mandatory cybersecurity audits, requires additional expenditure, and non-compliance may lead to regulatory sanctions.

IX. CHARACTERISTICS OF THE SECURITIES (INCLUDING ISIN CODES)

Issuer:	AKKO Invest Public Limited Company
Security to be converted:	"D" series registered, dematerialised share not admitted to trading on any stock exchange
Conversion ratio:	1 "D" series share is replaced by 4 "C" series ordinary shares
Number of "D" series shares to be converted:	7,459,878
ISIN of "D" series:	HU0000223573
Nominal value of "D" series:	HUF 100 per share
ISIN of "C" series:	HU0000170824
Nominal value of "C" series:	HUF 25 per share
New Shares:	29,839,512 registered, dematerialised "C" series ordinary shares

The "C" series and "D" series shares entitle their holders, under the Issuer's Articles of Association, to the same shareholder rights, with the voting right is proportionate to the nominal value of each share: each "C" series ordinary share with a nominal value of HUF 25 carries 1 vote, and each "D" series share with a nominal value of HUF 100 carries 4 votes. Accordingly, the exchange of 1 "D" series share for 4 "C" series ordinary shares does not in itself change the number of votes represented by the relevant shareholding.

The composition of the Issuer's subscribed capital before the Conversion:

Share series	ISIN	Nominal value	Number issued	Number of votes	Aggregate nominal value
Series "C" ordinary share	HU0000170824	HUF 25	40,026,239	40,026,239	HUF 1,000,655,975
Series "D" share	HU0000223573	HUF 100	7,459,878	29,839,512	HUF 745,987,800
Total:			**47,486,117**	**69,865,751**	**HUF 1,746,643,775**

The composition of the Issuer's subscribed capital after the Conversion:

Share series	ISIN	Nominal value	Number issued	Number of votes	Aggregate nominal value
Series "C" ordinary share	HU0000170824	HUF 25	69,865,751	69,865,751	HUF 1,746,643,775
Total:			**69,865,751**	**69,865,751**	**HUF 1,746,643,775**

X. DILUTION AND SHAREHOLDING FOLLOWING THE ISSUANCE

The Conversion results in the complete elimination of the "D" series and the creation of 29,839,512 New Shares. This corresponds to 74.55% of the 40,026,239 "C" series ordinary shares currently admitted to trading on the BSE, and represents 42.71% of the 69,865,751 "C" series ordinary shares following the Conversion.

The Conversion does not, however, result in economic or voting dilution relative to the Issuer's total subscribed capital and total votes. The reason is that the 7,459,878 "D" series shares already represent a total of 29,839,512 votes before the Conversion, with an aggregate nominal value of HUF 745,987,800. The 29,839,512 "C" series ordinary shares that replace them represent the same aggregate nominal value and the same number of votes.

Shareholders holding more than 5% of the Issuer, and their voting rights, before the Conversion:

Shareholder	"C" series ordinary shares (admitted to trading)	"D" series shares (not admitted to trading)	Voting rights
MEVINVEST Vagyonkezelő Kft. and DAYTON-Invest Kft. combined*	**20,037,142** (MEVINVEST Vagyonkezelő Kft.: 17,711,807; DAYTON-Invest Kft.: 2,325,335)	**7,459,878** (all "D" series shares are held directly by MEVINVEST Vagyonkezelő Kft.)	**71.39%** (MEVINVEST Vagyonkezelő Kft.: 68.06%; DAYTON-Invest Kft.: 3.33%)
Free float	19,989,097	0	28.61%
Total	**40,026,239**	**7,459,878**	**100.00%**

*The votes of MEVINVEST Vagyonkezelő Kft. and DAYTON-Invest Kft. must be aggregated pursuant to Section 65/A(4) of the Hungarian Capital Markets Act (Tpt.).

Shareholders holding more than 5% of the Issuer, and their voting rights, after the Conversion:

Shareholder	"C" series ordinary shares (admitted to trading)	Voting rights
MEVINVEST Vagyonkezelő Kft. and DAYTON-Invest Kft. combined**	**49,876,654** (MEVINVEST Vagyonkezelő Kft.: 47,551,319; DAYTON-Invest Kft.: 2,325,335)	**71.39%** (MEVINVEST Vagyonkezelő Kft.: 68.06%; DAYTON-Invest Kft.: 3.33%)
Free float	19,989,097	28.61%
Total	**69,865,751**	**100.00%**

**The votes of MEVINVEST Vagyonkezelő Kft. and DAYTON-Invest Kft. must be aggregated pursuant to Section 65/A(4) of the Hungarian Capital Markets Act (Tpt.).

XI. TERMS AND CONDITIONS OF THE PUBLIC OFFER

Not applicable. No public offer of the New Shares takes place in connection with the Conversion. The New Shares arise solely as a result of the conversion of the already issued "D" series shares in accordance with the Articles of Association.

XII. PLACE OF TRADING

The Issuer's 40,026,239 "C" series ordinary shares (ISIN: HU0000170824) have previously been admitted to trading on the regulated market of the BSE, in the Premium category. The New Shares will also be admitted to trading on the regulated market of the BSE. The Issuer is applying for the admission to trading of the 29,839,512 New Shares on the regulated market of the BSE, under the same ISIN code as the "C" series ordinary shares (HU0000170824).