MOL GROUP INTEGRATED ANNUAL REPORT

2024

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MOL GROUP APPROACH TO INTEGRATED AND SUSTAINABILITY REPORTING

MOL Group is committed to transparency towards capital markets and other interested stakeholders. Since 2008, MOL Group has been reporting its financial and non-financial performance in one integrated report. The integrated approach to reporting is the most efficient method of communicating previous year's performance. MOL Group's 17th Integrated Annual Report provides an account of the Group's financial and non-financial value creation, processes, risks and results encompassing the financial year from 1st of January to 31st of December 2024.

The main target audience of the Annual Sustainability Report are capital markets participants. However, the structure of MOL Group's sustainability reporting is also designed to meet the diverse information needs and priorities of the Group's wider stakeholder group.

MOL Group follows globally recognized reporting frameworks and standards to ensure that the Group's Integrated Annual Report meets the highest standards. MOL Group's integrated reporting process, as well as the contents of this report, is guided by the principles and requirements of the Value Reporting Foundation (which includes the resources of the Integrated Reporting <IR> Framework and the Sustainability Accounting Standards Board standards), whilst complying with the International Financial Reporting Standards (IFRS) as adopted by EU when reporting on financial results. The present report is also in compliance with the Directive 2014/95/EU on disclosure of non-financial and diversity information by large companies, and serves as a report on progress against the ten principles of the United Nations Global Compact (UNGC).

The Group's sustainability report (page 138) has been prepared in accordance with the European Sustainability Reporting Standards (ESRS). The report also contains references to the Global Reporting Initiative (GRI), including the GRI Sector Standard for Oil & Gas. The content of the report was determined based on the Double Materiality Assessment approach required by ESRS and in line with EFRAG'S Value Chain Implementation Guidance. Further information on external reporting standards and guidelines are included throughout the report.

This integrated annual report has been prepared both in English and Hungarian. In the event of any discrepancies, the English version should take precedence. This integrated annual report's consolidated financial statements are subject to external assurance by Deloitte. Copy of Deloitte's independent assurance statement can be obtained from MOL Group's website. The Sustainability Information Chapter – including the EU Taxonomy Report and the sustainability developments per divisions in this integrated annual report was subject to external assurance by Deloitte. Deloitte's independent assurance statement can be found as separate documents.

The content of this integrated annual report is also available online at www.molgroup.info

LETTER FROM THE CHAIRMAN-CEO AND GROUP-CEO

2024 was not an easy year for MOL Group. The Ukrainian-Russian war still imposed challenges which we had to tackle in order to guarantee the security of supply in our countries. Also, regulations, government takes were still shaping the landscape of our business. On top of this, the uncertainties around the whole oil industry's future have been still in the air. All of these put their marks on our profitability. Despite all this we managed to maintain a stable operation – of which I am very proud. Although last year the external environment limited our growth potential, we continued to selectively expand our portfolio, made progress with our strategic investments and took important steps to further strengthen the security of supply in the region.

In addition to continuing our crude diversification project, we inaugurated the region's largest green hydrogen plant and the EUR 1.3 billion polyol complex in Tiszaújváros, and we have also paved the way for the expansion of our own green electricity production. We continue to build solar power capabilities in Hungary and we further strengthened the international network of our Upstream business through cooperation agreements. I am especially proud of the new discovery and record production in Vecsés. The outstanding performance of our Consumer Services just underlines that we put a right bet on transforming ourselves into a more retail oriented company.

For this year we expect that the uncertainties might change but will not disappear. The forced agenda of the transition of the oil industry creates a serious competition issue for Europe which we must tackle. Also, security of supply is still a priority for all players of the industry and without diverse energy procurement, affordable energy and strong industry, Europe might find itself in an increasingly difficult situation. The homework for us is clear: focus on our efficiency by keeping costs under control, continue the value generation in our core businesses and do start new things that make business sense and more profit.

MANAGEMENT DISCUSSION AND ANALYSIS OF 2024 BUSINESS OPERATIONS

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1. OVERVIEW OF THE MACROECONOMIC AND INDUSTRY ENVIRONMENT

Macroeconomic environment

Global output growth remained steady compared to 2023, despite central banks in advanced countries cautiously easing monetary policy as inflation faded. The 3.2% growth rate was below the historical average of 3.8%[1]. Geopolitical tensions rose, especially after Hamas' terrorist attacks on Israel in October 2023, leading to an Israeli invasion of Gaza and conflicts with Lebanon, Iran, and Houthi rebels. The Russian-Ukrainian war stalemate, U.S. presidential elections, and political crises in South Korea, France, and Germany added to uncertainty. Most major regions slowed, except for the United States, which grew by 2.8% due to stable consumption and a strong defence industry. China achieved a 5% GDP growth[2] in line with the government target but one of the slowest rates in decades, driven by low consumption, property market issues, and insufficient policy stimulus.

Growth continued to be subdued in the euro area (0.7% year-on-year; 0.8% in the EU)[3], driven primarily by a stagnating Germany. Ailing exports, strong import competition, high labour, energy and carbon costs, and other deficiencies in competitiveness – as identified by the Draghi report[4] – weighed down on manufacturing (especially in energy-intensive industries), and IT and communication services. Major euro area economies struggle with limitations to fiscal stimulus: the collapse of the government and a lack of willingness to abandon the debt break ('Schuldenbremse') in Germany; political instability and ballooning debt in France (at 114% of GDP); and the second highest debt-to-GDP ratio behind Greece in Italy (at 136% of GDP).[5] On the upside, the Spanish economy grew above 3% on the back of record tourism, strong domestic consumption and productivity growth; Greece performed unexpectedly well concerning its recent track record of weakness; and Ireland seemed to finally get out of the recession by the end of the year.

Central and Eastern Europe (CEE) showed decent but unspectacular recovery. While countries like Poland and Croatia experienced solid growth, weak external demand, especially the struggling German economy weighed on the performance of the others. Although real incomes recovered from the inflation shock, consumption remained lacklustre because of household savings rates staying well above pre-pandemic levels, a still bleak economic outlook, and geopolitical uncertainties. Wage growth and services inflation remained persistent in most countries, halting the monetary easing process that started in the first half of the year.

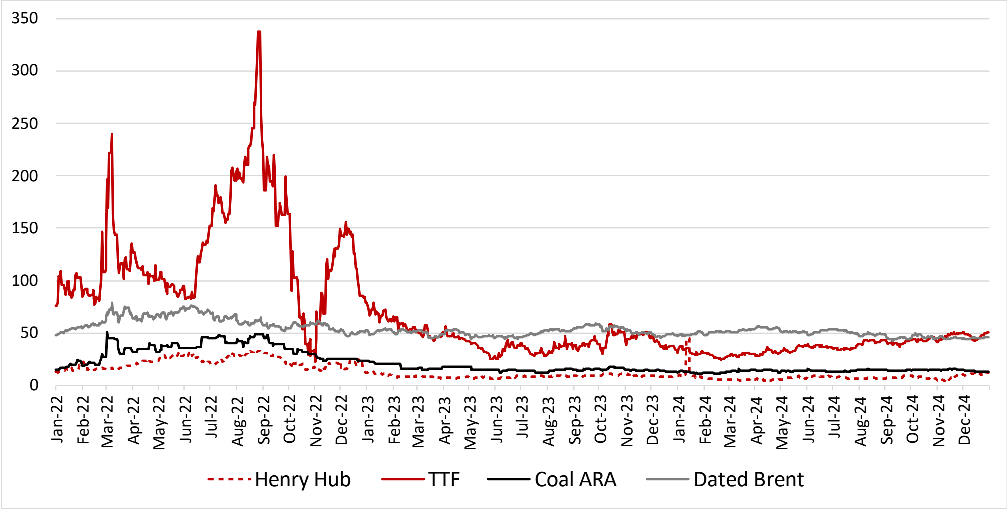
Hungary underperformed within the CEE region because the positive effects of net exports in 2023 faded by mid-2024, while domestic demand recovery was sluggish as well. Real GDP has fallen in Q2 and Q3 with average yearly growth coming in at 0.6%. Industry, agriculture and construction all contracted, with a slight positive growth in services. Still, monetary conditions were eased only gradually because of stubbornly sticky core inflation and the depreciation of the forint. Fiscal policy missed its 4.5% deficit target despite keeping a tight control of the expenditure side.

Oil and natural gas market developments

Benchmark Dated Brent crude prices averaged 80.8 USD/bbl in 2024[6], 2.2% lower than in 2023 with monthly crude prices staying within the 70-90 USD/bbl range. The spot price of Brent reached a 2024 peak of 93 USD/bbl on April 12, 2024, amid concerns that the tensions between Iran and Israel could escalate into a wider conflict and disrupt global oil supplies. Sluggish demand and robust non-OPEC+ supply kept crude prices in the relatively narrow trading range despite geopolitical tensions in the Middle East and shipping disruptions in the Red Sea. Several extensions of OPEC+ production cuts also helped keep prices from falling below this range. On the demand side, weakening economic growth and lower-than-expected fuel demand in China because of substitution toward liquefied natural gas for trucking goods and expanding electric vehicle ownership contributed to the downward pressure on the price. At the same time, production growth from non-OPEC+ members continued to increase, offsetting OPEC+ production cuts. U.S. production of crude oil reached a monthly record in October 2024 of 13.4 Mmbpd[7], and production in Guyana and Canada also increased on an annual basis in 2024. Although the disruptions to shipping in the Red Sea continued through 2024, oil exporters were able to find alternative routes, and supplies were mostly unaffected. Also, the conflict between Iran and Israel has not, of yet, created supply disruptions.

[1] IMF World Economic Outlook (January 2025).
[2] National Bureau of Statistics of China (17 january 2025)
[3] Eurostat Flash Estimate (January 2025).
[4] EU competitiveness: Looking ahead (September 2024).
[5] Government debt in the euro area (Eurostat, Q3 2024).
[6] S&P Global Marketplace - Connect Solution.
[7] U.S. Energy Information Administration.

Figure 1 Selected crude, natural gas and coal prices dtd (USD/MWh, 2022-2024, Bloomberg data)



European natural gas prices continued the correction from the 2022 record high levels in 2024. The average price of TTF (Title Transfer Facility), Europe's largest gas trading hub, dropped from an average of 41.3 EUR/MWh in 2023 to 34.6 EUR/MWh in 2024 (-16%).[6] However, the downward trend turned around with the start of winter. While in the first half of the year prices were supported mainly by the recovery in Asian demand, the year-end price rally was more of a European story. A colder winter start in the continent and softer wind conditions creating higher-than-usual gas demand in the European power sector led to a faster depletion of storage inventories than last year despite the still underperforming European industrial sector. Markets monitor storage depletion closely because current European storage mandates effectively mean that the greater the inventory depletion this winter, the more injection demand will be required to meet mandate volumes next Summer. In November, the threat of further 15 bcm Russian supply cut via Ukraine by 1 January 2025 – affecting primarily Austria, Czechia, Slovakia and to a lesser extent Hungary – quickly drove TTF prices close to 50 EUR/MWh again as alternative pipeline supply has already been largely maximised, leaving most of the balancing on Western European re-exports and storage withdrawals.

Downstream

Refinery margins in all major regions halved in 2024 and returned to their pre-pandemic 'normal' range. Besides rising costs, the narrowing of crack spreads was the main driver behind the decline due to the combination of weak demand for petroleum products and an increase in the global refining capacity. Economic slowdown in China and Europe in particular hurt consumption. The ongoing adoption of alternative powertrains and fuels has also limited demand growth for conventional fuels. On the supply side, U.S. refineries were running at record-high operating rates, and huge new facilities were ramping up in Kuwait, Saudi Arabia, Oman, Mexico, and Nigeria.

European petrochemicals continued to face stagnating demand, stalled investments, shrinking production, high energy costs and an increasingly ambitious environmental regulation in 2024. Coupled with limited global demand growth and high capital spending in other regions, the global chemical market has become increasingly competitive. Global excess capacity for ethylene and propylene, particularly in China, continued to depress polymer spreads as the structurally higher costs of energy and decarbonization in Europe met low-cost import competition. EU27 capacity utilisation remained well below historical averages despite Europe maintaining a positive trade balance in chemicals. In fact, exports are not growing at the same pace as the global market, and there is an ongoing shift of manufacturing to regions in Asia, with China outpacing all others. To avoid further deindustrialization, the European Commission decided to support the region's industry in reducing carbon emissions and transitioning to more sustainable products, but actual policies have yet to materialize.

Macro figures (average)	FY 2024	FY 2023	Ch %
Brent dated (USD/bbl)	80.8	82.6	(2)
Urals-Brent spread (USD/bbl, DAP India Urals quotation)(5)	(3.6)	(10.0)	(63)
TTF gas price (EUR/MWh)	34.6	41.3	(16)
Premium unleaded gasoline 10 ppm (USD/t)(11)	789.0	856.4	(8)
Gas oil – ULSD 10 ppm (USD/t)(11)	748.4	828.9	(10)
Naphtha (USD/t)(12)	622.3	602.9	3
Fuel oil 3.5 (USD/t)(12)	444.1	427.4	4
Crack spread – premium unleaded (USD/t)(11)	178.1	231.2	(23)
Crack spread – gas oil (USD/t)(11)	137.5	203.7	(32)
Crack spread – naphtha (USD/t)(11)	11.3	(22.3)	n.a.
Crack spread – fuel oil 3.5 (USD/t)(11)	(166.8)	(197.7)	(16)
Crack spread – premium unleaded (USD/bbl)(11)	14.0	20.2	(31)
Crack spread – gas oil (USD/bbl)(11)	19.7	28.6	(31)
Crack spread – naphtha (USD/bbl)(12)	(10.8)	(14.9)	(28)
Crack spread – fuel oil 3.5 (USD/bbl)(12)	(10.6)	(15.1)	(30)
Brent-based MOL Group refinery margin (USD/bbl)(10)	6.1	9.0	(32)
Brent-based Complex refinery margin (MOL + Slovnaft) (USD/bbl)(10)	6.4	9.3	(31)
Ethylene (EUR/t)	1,216.7	1,205.8	1
Butadiene-naphtha spread (EUR/t)	383.8	291.8	32
MOL Group variable petrochemicals margin (EUR/t)(9)	206	144	44
HUF/USD average	365.2	353.3	3
HUF/EUR average	395.2	382.0	3
O/N USD SOFR (%)	5.1	5.0	2
3m EURIBOR (%)	3.6	3.4	6
3m BUBOR (%)	7.3	14.3	(49)

Macro figures (closing)	FY 2024	FY 2023	Ch %
Brent dated closing (USD/bbl)	74.6	77.6	(4)
HUF/USD closing	393.6	346.4	14
HUF/EUR closing	410.1	382.8	7
MOL share price closing (HUF)	2,730	2,826	(3)

Notes and special items are listed in Appendix I and II.
Historical macro figures are available in the annual Data Library on the company's website.

2. INTEGRATED CORPORATE RISK MANAGEMENT

As an operator in a high-risk industry MOL Group is committed to manage and maintain its risks within acceptable limits.

The aim of MOL Group Risk Management is to keep the risks of the business within acceptable levels and safeguard the resilience of its operations as well as the sustainable management of the company. For this purpose, as an integral part of our corporate governance structure, MOL Group has developed a comprehensive Enterprise Risk Management (ERM) system which focuses on the organisation's value creation process, meaning factors critical to the success and threats related to the achievement of objectives but also occurrence of risk events causing potential impact to people, assets, environment or reputation. Within the ERM framework all significant risks throughout the whole Group are identified, assessed, evaluated, treated and monitored, covering all business and functional units, geographies as well as projects, taking into consideration multiple time horizons.

Regular risk reporting to top management bodies, including the Board of Directors with its committees provides oversight on overall the risk profile and the largest risks as well as assurance that updated responses, controls, and appropriate mitigation actions are set and followed.

The Group faces financial, operational and strategic risks, including but not limited to the below.

Risks/processes	Risk description	Risk mitigation methods
Market and financial risks		
Commodity price risk	The Group is exposed to commodity price risk on both the purchasing side and the sales side. The main commodity risks stem from its long positions in crude oil, refinery margin and petrochemical margin.	• Integrated business model • Continuous monitoring • When necessary, commodity hedging instruments to mitigate other than 'business as usual' risks or general market price volatility
Foreign exchange (FX) risk	The Group has FX exposure due to mismatch of currency composition of cash inflows and outflows, investments, debts.	• Monitoring FX risk and balancing the FX exposures of the operating & investment cash flow with the financing cash flow exposures when necessary and optimal
Interest rate (IR) risk	MOL Group has a mixture of floating and fixed interest rate debts. Floating rate debt are subject to interest rate changes.	• Continuous monitoring • Adequate mix of funding portfolio • When necessary, interest rate swap hedging instruments to mitigate risks
Credit risk	MOL Group provides products and services with deferred payment terms to eligible customers which exposes it to credit risk.	• Diversified customer portfolio • Customer evaluation model, continuous monitoring • Group-wide credit insurance program
Financing/Refinancing risk	MOL Group has significant debt outstanding. Inability to refinance those or inability to draw down funds could cause liquidity problems.	• Diversified funding sources/instruments • Diversified, balanced, and decently long maturity profile • Investment grade rating (BBB-) supports smooth capital markets access
Operational Risks		
Physical asset and process safety and equipment breakdown risk	Process Safety Event (Major Industrial accident) due to loss of mechanical integrity, technical, technological or operational issues, process maintenance difficulties, lack of competent human resources.	• Comprehensive HSE activities, a group-wide Process Safety Management system including asset related operational risk management process • Lifetime Extension program continued in petchem and rolled out to refineries • Preventive & Predictive maintenance (Uptime program) with thorough equipment criticality assessment behind • Group-wide insurance management program
Crude oil and gas supply risk	Crude supply disruption (insufficient quantity or quality) can disrupt refineries and petchem sites continuous operation.	• Crude oil-supply diversification strategy implemented; • Emergency reserves available

Critical material, equipment or service supply risk	Disruption in critical (raw) materials and/or equipment and/or services may cause delays in operation and/or increase costs	• Stock management • Supplier management • Sourcing and supply chain diversification
Exploration & Production reserve replacement	Higher than expected decline and failure to replace reserves.	• Production optimization programs and organic reserve replacement activities are both focus areas of Exploration & Production operations
Cyber risk	Global trends showing steadily growing frequency and intensity of Cyber-attacks / incidents. AI is a new global threat which is widely used by attackers as well as more specified Cyber Crime Groups targeting Industrial Control System's weaknesses, which may have increasing economic impact and relevance on MOL Group. Ukraine War significantly reduce Russian and Ukraine hacker group activities as they focus on war, significant investment on attacking methods by all stakeholders, furthermore these grown capabilities could lead to huge impact on the future.	• Continuous improvement of cyber security capabilities • Continuous supervision of cyber security risks (Group and opco level) ensuring the protection of the confidentiality, integrity and availability of data • Cyber security is built into all the MOL Group products and services • Continuous education of employees and partners.
Fraud Risk	Fraudulent activities (external & internal fraud) may cause significant financial and reputational losses	• Control functions on local and group level • Anti-Fraud Awareness (Newsletter, Mandatory trainings) • Anti-Fraud & Investigation procedures, dedicated Team
Pandemic Risk	Pandemics may significantly adversely affect the Group's business environment, including price and demand on the Group's products and services, availability of contractors, subcontractors as well as raw materials, creditworthiness of credit customers, availability of the Group's key personnel.	• Crisis Management plans in place • Our Group Pandemic Preparedness Framework methodology instruction was issued in January 2023, reapproved in January, 2025, summarizing not only the WHO general approach but entire MOL Group internal experiences of last 3-4 years, ensuring a life-proof and working framework to manage any possible further endemic/ pandemic situations. • Continued and sustainable practices defined, adjusted to country local measures and company internal circumstances
Strategic risks		
Regulatory and sanctions risk	MOL has significant exposure to a wide range of laws, regulations and policies on the global, the European and the individual country level, that may change significantly over time and may even require the Group to adjust its core business operation.	• Continuous monitoring of new regulations and sanctions • Strengthened compliance process • Participation in legislative processes, consultations • Adopting MOL strategy in response to changes
Country risk	The international presence of MOL Group contributes to diversification but also exposure to country specific risk at the same time. Government actions may be affected by the elevated risk of economic and, in some regions, (geo)political crisis, increasing their impact on MOL's operations.	• Continuous monitoring of the (geo)political risk, compliance with local regulations and international sanctions • Investment opportunities are valuated with quantifying of country risk in discount rate
Reputation risk	MOL, as a major market player and employer in the region with a sizeable operational footprint, operates under special attention from a considerable number of external stakeholders.	• Stakeholder governance processes introduced to monitor and adjust to any reputational risks
Climate change risk	Transition and physical risks associated with climate change have the potential to negatively impact MOL's current and future revenue streams, expenditures, assets and financing.	• MOL Group's transformational strategy • Several operational steps taken to mitigate physical risks emanating from climate change (more information in the Sustainability Report)
Capex Project Execution Risk	Projects are delayed or less profitable than expected or unsuccessful for numerous reasons, including cost overruns, higher raw material or energy prices, longer lead time in equipment deliveries, limited availability of contractors and execution difficulties.	• Disciplined stage gate process across Capex project pipeline • Dedicated team to identify risks at earlier stages, plan for mitigation or avoidance by linking potential risks with schedule and budget to build realistic estimates and following it up through the project lifecycle • Supplier selection criteria, audits

Human Capital Risk	The Group's ability to implement its Shape Tomorrow Strategy is dependent on the capabilities and performance of its people, management, experts and technical personnel. Unavailability of skilled workforce may lead to disruptions in the operation.	• HR framework to attract, develop and engage employees • Capability development for all employee levels to ensure future-proof skillset • Intergenerational collaboration to enhance internal knowledge transfer • Focus on digital transformation, and employee experience • Developing diverse & collaborative culture • Working environment and conditions framework in order to attract and retain diverse talents

ESG risks are covered and considered as part of the following topics (including but not limited to): Climate Change, Human Capital, Physical asset and process safety and equipment breakdown risk, Cyber Risk, Fraud Risk, Pandemic Risk, Regulatory and sanctions risk.

Risk Review Process in 2024

Risk owners in the Group identified, analysed and evaluated their major risks during 2024 – both on medium-term and long-term time horizon – and defined and/or updated the relevant mitigation plans. Risk reports have been discussed by the Finance and Risk Management Committee of the Board of Directors and the Audit Committee.

The Group has faced challenges due to continued geopolitical tension, thus considers related risks, such as sanctions, regulatory as well as supply-related risks elevated and implements mitigation measures. Furthermore, Cyber Risk has been in the Group's focus due to external trends (geopolitical developments and AI).

Supply-related risks: The Group has elaborated the crude diversification strategy; alternative crude slate was defined, relevant capex projects defined and started. Supply chain difficulties have been addressed, mitigated by stock, supply chain and supplier management actions. In order to ensure continuous supply of crude oil via Druzhba pipeline MOL Group has concluded agreements with crude oil suppliers and pipeline operators.

Regulatory and sanctions risks: MOL Group has been continuously and closely monitoring the sanctions, countersanctions and strengthened the compliance processes. In several countries where the Group operates, various forms of government interventions in energy markets took place (margin caps, new taxes, government takes) in recent years, which had material financial impact on the Group. In addition, national implementation of EU initiatives (in particular Fit for 55 related targets) poses significant compliance risks.

Main risk management tools

As described above, as a general risk management framework, we operate an Enterprise Risk Management system.

Hedging Policy: To ensure the profitability and the financial stability of the Group, financial risk management is in place to handle short-term, market related risks. Commodity price risk exposure is assessed regularly and are managed – if and when necessary – with hedging measures. Liquidity risk related to derivative instruments are measured regularly by using a complex model based on advanced statistical methods.

Insurance Policy: transferring the financial consequences of our operational risks is done by insurance management, which represents an important risk mitigation tool to cover the most relevant exposures and liabilities arising out of our operations. Insurance is managed through a joint program for the whole Group to exploit considerable synergy effects.

Crisis and Business Continuity Management: following best industry practice and focusing on low probability high potential risks that could disrupt our operations, value chain and cash generation, MOL Group has implemented and is currently working to integrate a crisis management and business continuity program in order to reduce recovery times within tolerable limits for processes critical to our business.

For TCFD disclosure, please refer to the Sustainability Report.

3. FINANCIAL AND OPERATIONAL OVERVIEW OF 2024

	HUF billion			USD million		
Summary of results	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Net sales	9,178.7	8,908.5	3	25,127	25,217	0
EBITDA	1,091.3	1,149.3	(5)	2,992	3,235	(8)
EBITDA excl. special items[1]	**1,091.3**	**1,123.7**	**(3)**	**2,992**	**3,162**	**(5)**
Clean CCS-based EBITDA [1] [2]	**1,121.7**	**1,098.4**	**2**	**3,073**	**3,093**	**(1)**
Profit from operation	584.9	677.6	(14)	1,615	1,898	(15)
Profit from operation excl. special items[1]	**603.8**	**722.8**	**(16)**	**1,663**	**2,026**	**(18)**
Clean CCS-based operating profit [1] [2]	**634.2**	**697.5**	**(9)**	**1,744**	**1,957**	**(11)**
Net financial gain / (expenses)	(66.9)	12.5	n.a.	(181)	36	n.a.
Net profit attributable to equity holders of the parent	**368.2**	**530.4**	**(31)**	**1,023**	**1,484**	**(31)**
Operating cash flow before change in working capital	914.6	667.3	37	2,488	1,842	35
Operating cash flow	820.5	754.0	9	2,218	2,138	4
EARNINGS PER SHARE						
Basic EPS, HUF	496.2	715.4	(31)	1.38	2.00	(31)
INDEBTEDNESS						
Simplified Net debt/EBITDA	0.74	0.59	n.a.			
Net gearing[4]	14.9%	14.0%	n.a.			

KEY FINANCIAL DATA BY BUSINESS SEGMENTS

	HUF billion			USD million		
Net Sales Revenues [3] [6]	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	685.4	723.9	(5)	1,871	2,043	(8)
Downstream	7,155.1	7,210.7	(1)	19,578	20,410	(4)
Gas Midstream	127.3	141.5	(10)	348	400	(13)
Consumer Services [13]	3,741.2	3,634.8	3	10,240	10,295	(1)
Circular Economy Services	428.6	192.1	123	1,182	543	118
Corporate and other	436.4	316.8	38	1,187	898	32
Total Net Sales Revenues	**12,573.9**	**12,219.8**	**3**	**34,406**	**34,589**	**(1)**
Intersegment transfers[7]	(3,395.2)	(3,311.3)	3	(9,279)	(9,372)	(1)
Total external net sales revenues from cont.op.	9,178.7	8,908.5	3	25,127	25,217	0
Total external net sales revenues from discont.op.	0.0	0.0	n.a.	0	0	n.a.
Total External Net Sales Revenues [6]	**9,178.7**	**8,908.5**	**3**	**25,127**	**25,217**	**0**

EBITDA	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	402.1	365.5	10	1,099	1,026	7
Downstream	427.4	490.2	(13)	1,171	1,375	(15)
Gas Midstream	89.0	93.8	(5)	244	265	(8)
Consumer Services [13]	271.0	244.8	11	743	695	7
Circular Economy Services	(20.3)	13.2	n.a.	(52)	37	n.a.
Corporate and other	(68.0)	(73.2)	(7)	(185)	(209)	(11)
Intersegment transfers[7]	(9.9)	15.0	n.a.	(29)	46	n.a.
Total EBITDA from cont.op.	**1,091.3**	**1,149.3**	**(5)**	**2,992**	**3,235**	**(8)**
Total EBITDA from discont.op.	(40.7)	(2.5)	n.a.	(111)	(8)	n.a.
Total EBITDA	**1,050.6**	**1,146.8**	**(8)**	**2,881**	**3,227**	**(11)**

	HUF billion			USD million		
Depreciation	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	170.3	126.8	34	462	358	29
Downstream	180.3	161.1	12	491	457	7
Gas Midstream	16.6	17.4	(4)	46	49	(8)
Consumer Services [13]	77.3	122.8	(37)	210	349	(40)
Circular Economy Services	13.1	1.5	776	36	4	755
Corporate and other	50.2	43.0	17	137	122	13
Intersegment transfers[7]	(1.4)	(1.0)	46	(5)	(2)	182
Total Depreciation from cont.op.	**506.4**	**471.7**	**7**	**1,377**	**1,337**	**3**
Total Depreciation from discont.op.	0.0	0.0	n.a.	0	0	n.a.
Total Depreciation	**506.4**	**471.7**	**7**	**1,377**	**1,337**	**3**

Operating Profit	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	231.8	238.7	(3)	638	667	(4)
Downstream	247.0	329.1	(25)	681	919	(26)
Gas Midstream	72.4	76.4	(5)	199	216	(8)
Consumer Services [13]	193.8	122.0	59	532	346	54
Circular Economy Services	(33.4)	11.7	n.a.	(88)	33	n.a.
Corporate and other	(118.3)	(116.2)	2	(323)	(331)	(3)
Intersegment transfers[7]	(8.5)	15.9	n.a.	(24)	49	n.a.
Total operating profit cont.op.	**584.9**	**677.6**	**(14)**	**1,615**	**1,898**	**(15)**
Total operating profit discont.op.	(40.7)	(2.5)	n.a.	(111)	(8)	n.a.
Total Operating Profit	**544.2**	**675.1**	**(19)**	**1,504**	**1,891**	**(20)**

EBITDA Excluding Special Items [1]	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	402.1	339.9	18	1,099	953	15
Downstream	427.4	490.2	(13)	1,171	1,375	(15)
Downstream - clean CCS-based[2]	463.4	472.4	(2)	1,267	1,328	(5)
Gas Midstream	89.0	93.8	(5)	244	265	(8)
Consumer Services	271.0	244.8	11	743	695	7
Circular Economy Services	(20.3)	13.2	n.a.	(52)	37	n.a.
Corporate and other	(68.0)	(73.2)	(7)	(185)	(209)	(11)
Intersegment transfers[9]	(9.9)	15.0	n.a.	(29)	46	n.a.
Total Clean CCS-based EBITDA [2]	**1,121.7**	**1,098.4**	**2**	**3,073**	**3,093**	**(1)**
Total EBITDA excluding special items cont.op.	**1,091.3**	**1,123.7**	**(3)**	**2,992**	**3,162**	**(5)**
TOTAL EBITDA excluding special items discont.op.	(40.7)	(2.5)	n.a.	(111)	(8)	n.a.
Total EBITDA excluding special Items	**1,050.6**	**1,121.2**	**(6)**	**2,881**	**3,154**	**(9)**

	HUF billion			USD million		
Operating Profit Excluding Special Items[1]	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	250.8	216.8	16	686	605	13
Downstream	247.0	329.1	(25)	681	919	(26)
Gas Midstream	72.4	76.4	(5)	199	216	(8)
Consumer Services [13]	193.8	183.3	6	532	521	2
Circular Economy Services	(33.4)	11.7	n.a.	(88)	33	n.a.
Corporate and other	(118.3)	(110.4)	7	(323)	(315)	3
Intersegment transfers[7]	(8.5)	15.9	n.a.	(24)	48	n.a.
Total operating profit excluding special items cont.op.	**603.8**	**722.8**	**(16)**	**1,663**	**2,026**	**(18)**
Total operating profit excluding special items discont.op.	(40.7)	(2.5)	n.a.	(111)	(8)	n.a.
Total Operating Profit Excluding Special Items	**563.1**	**720.3**	**(22)**	**1,552**	**2,018**	**(23)**

Capital Expenditures	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Upstream	115.8	129.6	(11)	316	367	(14)
Downstream	316.0	223.0	42	860	634	36
Gas Midstream	17.8	12.4	44	47	35	34
Consumer Services [13]	62.8	181.3	(65)	169	525	(68)
Circular Economy Services	34.1	22.1	54	93	63	48
Corporate and other	85.9	53.4	61	227	152	50
Intersegment transfers[7]	(2.4)	(3.0)	(20)	(7)	(9)	(22)
Total Capital Expenditures	**630.0**	**618.7**	**2**	**1,705**	**1,767**	**(3)**

Notes and special items are listed in Appendix I and II.

3.1 KEY ACHIEVEMENTS AND SUMMARY OF 2024 RESULTS

In 2024, MOL reached Clean CCS EBITDA of HUF 1,121.7 bn (USD 3,073 mn), 2% higher in HUF terms than in the previous year and exceeding the capital market guidance of around USD 3 bn. Operating cash flow was burdened by income tax payments amounting to HUF 195.6bn (USD 540mn) and by working capital build of HUF 94.1 bn (USD 270mn); accordingly, operating cash flow generation after working capital arrived at HUF 820.5bn (USD 2,218mn) in 2024.

Key Financial Highlights

- Upstream segment's EBITDA, excluding special items, reached HUF 402.1 bn (USD 1,099 mn) in 2024, representing a 18% increase compared to 2023 in HUF terms as production volumes increased and the Hungarian mining royalty payments decreased as minimum production levels were met.
- In 2024, Downstream achieved a Clean CCS EBITDA of HUF 463.4 bn (USD 1,267 mn), which is 2% lower than the previous year's performance. The macro environment had a negative impact on Refining and Marketing (R&M) results with the significantly weakened refining margin in 2024, partly offset by a higher sales results. Due to the continuing downward trend in the industry, the Petchem segment contributed negatively to Clean CCS EBITDA.
- Consumer Services EBITDA increased by 11% in 2024, reaching HUF 271.0 bn (USD 743 mn) as a combination of organic growth driven by non-fuel sales and the Slovenia acquisition which was closed in mid-2023.
- Gas Midstream reached HUF 89.0 bn (USD 244 mn) EBITDA in 2024, representing a decrease of 5% compared to 2023, driven by rising transmission demand and changes in regulated tariffs.
- Circular Economy Services was reported as a separate segment starting in 2024 and reported a negative EBITDA of HUF 20.3 bn (USD -52 mn) for the full year due to the startup phase of the companies within the segment and the ramp-up in the Deposit Refund System (DRS) leading to extra expenses.

- Total CAPEX spending reached HUF 630.0 bn (USD 1,705mn), indicating an increase of 2% year-on-year, despite mainly less acquisitions completed in 2024 than in 2023. Looking at organic CAPEX, the 2024 figure came in 21% higher than in 2023 at HUF 603.5 bn (USD 1,636 mn), mainly due to the heavy turnarounds leading to higher sustain-type CAPEX during the year.
- Indebtedness on a Net Debt/EBITDA basis rose slightly to 0.74x by end-2024 from 0.59x a year earlier but remained comfortably below the management guidance threshold of 1.0x.

Key Operational Highlights

- Annual oil and gas production reached 93.8 mboepd in 2024, well overachieving the annual guidance of ~90 mboepd, (modified to 92-94 mboepd in November 2024). Production increased significantly in Hungary and first gas was announced in December 2023 in Kazakhstan, adding to the Group's production significantly in 2024.
- The Consumer Services network decreased to 2,330 stations by the end of 2024, down 4% yer-on-year. The expansion of the non-fuel concept also continued, with 36.8% of the total margin generated by non-fuel in 2024, up by 2.5 percentage points.
- In Downstream, organic investments increased significantly as many lifetime extension projects were completed during the year and the polyol complex was also inaugurated in the spring of 2024.
- MOL proceeds with green transition:
    - 66 MWp photovoltaic plant acquired in Central Hungary to contribute to an increasing share of renewables in MOL's energy mix
    - Production in 10 MW electrolyser unit started in September in Százhalombatta with 1,600 tpa green hydrogen expected to be used in Danube Refinery
    - Design phase started for 40 ktpa chemical recycling unit in Hungary.
- Key group financial and operational figures and historical financial statements are available in the annual Data Library on the company's website.

3.2 CORPORATE STRATEGY

MOL Group was one of the first players in the industry to come to terms with the changing environment and communicate its plan on the best path forward to the public. The 2030 strategy published in 2016 focused on a balanced transition towards meeting the demands of a low-carbon economy while at the same time addressed how the tradition fossil-based economy can adapt and what role MOL Group can play in this change. This direction was reaffirmed already twice, first in 2021 and latest in March 2024 in the "Shape Tomorrow" strategy.

Shape Tomorrow strategy

Drawing lessons from the COVID-19 pandemic and geopolitical crises since, the company has outlined a clearer transition pathway through 2030, with the ultimate ambition of achieving net climate neutrality by 2050. This transition is underpinned by the relatively strong expansion of Central and Eastern European (CEE) economies and MOL's ambition to sustain or expand its presence in its core wholesale and retail markets, allowing enough financial and time horizon to commence with its ambitious transition programme.

On the transition front, MOL's updated strategy sets ambitious goals, aiming for a 25% absolute reduction in Scope 1 & 2 emissions by 2030 compared to 2019. On Scope 3 emissions, MOL recognises that most of the evolution is based on regional fossil fuel demand trends and is thereby less under the company's control than emissions under the first two Scopes. Still, a Scope 3 target of 5% absolute reduction by 2030 has been set out.

MOL also recognises that the path of transition will be capital-intensive and not only does MOL have to go beyond the oil&gas standard areas of expertise, the financial allocation will also have to be re-established. Therefore, between 2025-2030, ca. 30-40% of MOL's CAPEX budget will be allocated to low-carbon initiatives. However, it is important to note that MOL remains conservative with regards to hurdle rates and generally with its CAPEX budget and expects that organic investments will amount to USD 1.9 bn on average in 2025-2030 in real terms, a notch higher than the USD 1.8 bn average in 2018-2023. This allows MOL to maintain a healthy balance sheet and allocate sufficient funds for possible inorganic investments and competitive shareholder remuneration.

Segments contribution to the strategy

With the most transition-related challenges lying within MOL's **Downstream** segment, the most complex and far-reaching projects have been underway for over a decade. Beyond the shift towards petchem, new focus areas include circularity, biofuels, green hydrogen, and biogas. Moreover, electrification and a shift towards renewable energy solutions is also an important pillar of the strategy. While continuing to engage in such deep transformation, however, MOL by default will keep being committed to diversifying its crude mix and to strengthen energy security.

MOL set up its **Circular Economy Services** framework in 2023 when started operating the waste management concession in Hungary. A major step was the introduction of the Deposit Refund System, which successfully ramped up along 2024 and now manages over 6 million plastic or glass packaging returned per day. By 2030, MOL's waste management division aims to supply 1.5 million tons of waste-based feedstock to Hungarian industries, including its own Downstream operations.

MOL's **Consumer Services** segment continues its evolution into a digitally-driven retailer and integrated mobility provider. The focus is on developing multi-purpose service stations, enhancing customer-centric operations, and becoming a regional leader in mobility solutions. Having nearly achieved its USD 700 million EBITDA target for 2025 as early as 2023, the segment has set a new ambition: reaching USD 1 billion in EBITDA by 2030.

The **Upstream** segment remains a crucial cash generator for MOL Group, with expected average daily production exceeding 90,000 barrels of oil equivalent (boe) and direct production costs of USD 6-8/boe between 2025 and 2030. In the CEE region, efforts will focus on optimizing production, enhancing infrastructure, and improving hydrocarbon recovery to maintain output and support regional energy security. At the same time, MOL is prioritizing low-carbon technologies, including geothermal energy, lithium extraction, methane emission reduction, and carbon capture, utilization, and storage (CCUS). In its international portfolio, MOL will continue active portfolio management, with decisions driven by return metrics and time-to-market considerations. Through these strategic initiatives, MOL Group is reinforcing its position as a leader in the energy transition while ensuring financial resilience and long-term growth.

3.2.1 SCENARIO ANALYSIS

The "Shape Tomorrow" strategy update, published in March 2024, is based on a detailed analysis of the external environment, exploring the main trends and directions of general macroeconomic conditions, the oil and gas industry, and ancillary markets that have – or potentially have – a large impact on MOL's operation. Based on the analyses of these markets, MOL prepares numeric forecasts of the key macroeconomic and industry-specific parameters. The forecasts are prepared for three scenarios: Slow Transition, Steady Transition & Net Zero Emission. The green energy transition is happening in all three scenarios, the biggest difference between them is the pace of the transition. The Shape Tomorrow Strategy is predominantly based on the Steady Transition scenario. If one of the other two scenarios would materialise, it would mostly affect the timing of the investments envisaged in the Shape Tomorrow Strategy and not the strategic directions themselves.

MOL operates a "Premises Committee" made up from representatives of the main business divisions and functional areas. The committee is tasked with monitoring the main indicators and assumptions used in the different scenarios and carrying out updates following changes to the external environment. This system can provide early notice that the external environment is moving to a different stage along the chosen scenario path, or potentially moving towards a different scenario altogether, providing senior management the opportunity to reassess and adjust its plans accordingly. Changes to the premises – partially or fully - automatically triggers a notification to the Executive Management and the Board of Directors, and as a result it may cause a modification of the strategy. Any changes to the strategy would need approval from the Board of Directors.

3.3 UPSTREAM

Segment IFRS results (HUF bn)	FY 2024	FY 2023	Ch %
EBITDA	402.1	365.5	10
EBITDA excl. spec. items[(1)]	**402.1**	**339.9**	**18**
Operating profit/(loss)	231.8	238.7	(3)
Operating profit/(loss) excl. spec. items[(1)]	**250.8**	**216.8**	**16**
CAPEX and investments (organic)	**113.2**	**129.2**	**(12)**
o/w exploration CAPEX	17.0	11.5	48

Hydrocarbon Production (mboepd)	FY 2024	FY 2023	Ch %
Crude oil production	**39.8**	**38.1**	**4**
Hungary	11.5	10.0	15
Croatia	9.3	9.7	(4)
Kurdistan Region of Iraq	4.0	2.2	82
Pakistan	0.5	0.5	0
Azerbaijan	12.7	13.9	(9)
Other International	1.7	1.9	(11)
Natural gas production	**37.0**	**37.7**	**(2)**
Hungary	21.6	21.3	1
Croatia	11.3	11.9	(5)
o/w. Croatia offshore	*2.8*	*3.4*	*(18)*
Pakistan	3.9	4.5	(13)
Other International	0.2	0.1	100
Condensate[(5)]	**4.2**	**4.5**	**(7)**
Hungary	2.7	2.7	0
Croatia	0.7	0.8	(13)
Pakistan	0.8	1.0	(20)
Average hydrocarbon production of fully consolidated companies	**81.0**	**80.4**	**1**
Russia (Baitex)	3.5	3.8	(8)
Kazakhstan	2.7	0.0	n.a.
Hungary	0.4	0.0	n.a.
Kurdistan Region of Iraq (Pearl Petroleum)	6.3	6.2	2
Average hydrocarbon production of joint ventures and associated companies	**12.9**	**10.0**	**29**
Group level average hydrocarbon production	**93.8**	**90.4**	**4**

Main external macro factors	FY 2024	FY 2023	Ch %
Brent dated (USD/bbl)	80.8	82.6	(2)
TTF 1 month ahead (USD/MWh)	63.7	75.6	(16)

Average realised hydrocarbon price	FY 2024	FY 2023	Ch %
Crude oil and condensate price (USD/bbl)	71.6	76.8	(7)
Average realised gas price (USD/boe)	51.4	61.2	(16)
Total hydrocarbon price (USD/boe)	**63.2**	**70.1**	**(10)**

Production cost (USD/boe)	FY 2024	FY 2023	Ch %
Average unit OPEX of fully consolidated companies	**6.7**	**6.6**	**2**
Average unit OPEX of joint ventures and associated companies	3.5	2.3	52
Group level average unit OPEX	6.2	6.0	3

Capital Expenditures

FY 2024 HUF bn	Hungary	Croatia	Kurdistan Region of Iraq	Pakistan	Azerbaijan	Other	Total - FY 2024	Total - FY 2023
Exploration	9.2	5.2	0.0	0.7	1.9	0.0	**17.0**	**11.5**
Development	14.2	14.2	0.0	1.4	42.0	3.9	**75.6**	**94.8**
Other	6.3	11.1	1.6	0.3	1.4	0.0	**20.6**	**22.9**
Acquisitions	0.0	2.5	0.0	0.0	0.0	0.0	**2.5**	**0.4**
Total - FY 2024	**29.6**	**33.0**	**1.5**	**2.3**	**45.3**	**3.9**	**115.8**	
Total - FY 2023	**34.5**	**32.9**	**6.4**	**(0.5)**	**50.6**	**5.7**		**129.6**

Notes and special items are listed in Appendix I and II.
Tables regarding Hydrocarbon production (mboepd); Production cost (USD/boe); Average realised hydrocarbon price; Gross reserves (according to SPE rules): 1P – Proved reserve; 2P – Proved and Probable reserve; Costs incurred (HUF mn); Earnings (HUF mn); Exploration and development wells are available in the annual Data Library on the company's website.

3.3.1 FINANCIAL OVERVIEW OF 2024

Upstream EBITDA, excluding special items, increased by 18% year-on-year in 2024 and amounted to HUF 402.1bn, driven by royalty liability decrease, and by higher hydrocarbon production.

Total group production (including JVs and associates) increased by 4% compared to the previous year, resulting in an average 93.8 mboepd for the year. Higher production volume was mainly driven by MOL Hungary and Kazakhstan with newly drilled exploration and development wells that were put into the production in 2024, and Kurdistan impacted by the higher domestic demand, which was slightly counterbalanced by the lower production in Croatia due natural decline, and decreased production in Pakistan as a result of system constraint at transmission system operator side.

Group-level average unit direct production cost, excluding DD&A but including JVs and associates, increased by 3% and reached 6.2 USD/boe in 2024, reflecting inflationary pressure and higher realized energy prices.

Upstream organic CAPEX without equity assets amounted to HUF 113.2bn in 2024, decreasing by 12% year-on-year. The lower amount is mainly driven by lower spending on Azerbaijan's ACE project, the suspension of development projects in Kurdistan after the export pipeline closure in 2023, and less development activities in Hungary. More than 90% of organic CAPEX was spent in the CEE region and Azerbaijan, mostly for development projects.

In 2024, Upstream continued to be a key cash flow contributor of the MOL Group, with HUF 288.9bn (USD 792mn) simplified free cash flow generated.

Changes in the Upstream regulatory environment

CEE: In 2024, the EU Net Zero Industry Act entered into force. By 2030, the act aims to create a Union market for CO2 storage services. It sets a Union-level goal and mandates an annual CO2 storage capacity of at least 50 million tonnes, whereby the obligation to create such storage capacity will be imposed on oil and gas companies that are active in the exploration and production segment within the EU. The Net Zero Industry Act is an EU Regulation, thus, directly applicable in Hungary and Croatia, and applicable to MOL Group.

As of August 2024, Regulation 2024/1787 EU on reduction of methane emissions entered into force. The regulation's scope covers planned steps to monitor, detect and repair possible leakages of methane gasses and reduce methane emissions and flaring in EU.

In Hungary in 2024, the regulatory regime, established in 2023, remains in place. Effective from 1 April 2023, the royalty rate of the gas sold at market price was decreased from 88% to 42% in Hungary, however an additional new revenue-based tax was also introduced for 2023, calculated at 2.8% of 2022 net revenue of MOL Plc. This was extended to 2024 with a reduced rate of 1%. The income tax of energy suppliers was raised from 31% to 41% for 2023 and was also extended to 2024. Effective from 1 September 2023, an option was introduced for mining contractors to reduce royalty payment with the commitment to exceed the production level of 2022. As MOL signed the contract with the government, the royalty liability decreased significantly from September as the production commitments were delivered.

OPERATIONAL OVERVIEW OF 2024

Exploration

Total of 13 exploration and appraisal wells were drilled in 3 countries. Besides drilling, seismic acquisition campaigns and interpretation works progressed in Croatia, Hungary and Pakistan.

In Hungary, the Shallow Gas exploration program continued with the successful drilling and testing of three wells, of which two were put in production in 2024. Following the discovery in 2022, the Vecsés appraisal program began, with the drilling of the Vecsés-1 and -3 wells, which proved to be discoveries and are already in production, however exploration well Uszi-1 was found dry and plugged and abandoned. Pécel and Pölöske 3D seismic acquisition has been completed. New exploration bid round (8 licenses) was announced in September 2024, and 2 geothermal licenses were awarded (Százhalombatta and Kálócfa).

In Croatia, drilling campaign continued on Drava-03 block: Obradovci-5 well was drilled in September, and well test in December confirmed significant gas discovery. New 3D seismic Virovitica 3D (186 sqkm) was successfully acquired, covering area nearby Veliki Rastovac-1 discovery and ensuring portfolio upgrade for drilling in 2nd exploration phase. In March 2024, upon successful farm in process, Upstream added one non-operated exploration block Sava-07 in portfolio, with partner Vermilion as an operator. This partnership resulted in several successful drillings in 2024. Out of total four wells drilled, three wells Zbjegovača-1 East, Međurić-1 East and Gojlo-1 South wells resulted in commercial discoveries, while well test on Piljenice-1 well is still in progress. On Drava-02 and partially Sjeverozapadna Hrvatska-01 (excluding Severovci and Jankovac discoveries areas) exploration blocks, relinquishment was requested and approved by the Government. On geothermal exploration blocks Leščan and Međimurje-5, 3D seismic was recorded, covering apx. 150 sqkm. Preparation activities for the drilling of Leščan geothermal well were performed, spud in is expected in early 2025.

In Romania, 3D seismic was acquired on the EX-1 block, while permitting for acquisition on the block EX-5 is in progress.

In the Middle East, Asia and Africa region, exploration activities advanced in Pakistan and Egypt. In Pakistan, in operated TAL block drilling of Razgir-1 exploration well was completed with successful gas discovery. 3D Seismic Data Reprocessing is ongoing for Bilitang, Sarozai, Tolanj West, and Kot South areas. One-year extension of Margala's exploration licence was granted, request for TAL licence extensions have been submitted, and DG Khan Block has been relinquished. In Egypt, East Bir El Nus (block WD-08) exploration concession comprehensive operations of 200 sqkm 3D and 180 km 2D seismic acquisition were conducted and processing of the same is in progress. NAG project in Azerbaijan – drilling of West Chirag J34 initial producer is in progress, 1st stage completion is scheduled for March 2025 and the final stage completion in December 2025.

Field Development and Production

In 2024, Production optimization programs continued in Hungary, Croatia and Russia, which resulted in an annualized production uplift of 2.7 mboepd with a total of 128 well workovers performed.

In Hungary, field development activities continued with Forráskút-13 drilling and tying in, and Endrőd-É-21, Vízvár-S-2, Álm-É-4, and Görgeteg-Babócsa F8 wells tying in. All wells are in production. Bike Phase 2 gas injection (into Körösújfalu field) scope was approved and detailed designs received, and the Vecsés gathering station project is ongoing. The production optimization program continued, resulting in a total of 40 well interventions completed, consequently adding to production approx. 1.5 mboepd increment on an annualized basis. Contractual production commitments towards state have been delivered for 2024. MOL signed a sale and purchase agreement for O&GD's gas plant and related wells and mining plots in Eastern Hungary.

In Croatia, implementation of the Production Optimization project continued, and within its scope, a total of 64 well workovers were completed in 2024, contributing 0.5 mboepd additional production on an annualized basis. This includes production system optimization offshore, where campaign of acid treatments was performed, unfortunately with partial results and insignificant contribution. Extensive 3D seismic campaign was carried out during 2024, throughout 4 polygons on onshore, covering apx. 250 sqkm, with expected finish in Q1 2025. For INA-MOL cross-border project Zalata-Dravica Reserves Elaborate and Production contract were issued by relevant Croatian Ministry, and solving of property relations is ongoing. The Enhanced Oil Recovery (EOR) program continued with carbon dioxide injection on Ivanić and Žutica fields. In 2024 several energy efficiency projects were carried out; new steam turbine was installed on Molve plant to decrease purchase of electrical energy and reduction of CO2 emissions (start-up in January 2025).

In the CIS region, drilling program in Russia has been suspended in 2024 based on Partners' decision, however, well workover program continued, with 24 well interventions completed with achieved average initial incremental production of 30 boepd/well. In Kazakhstan, four additional wells from Rozhkovskoye field (U-10, U-12, U-23, U-26) were put in production during 2024. In Azerbaijan, a total of 19 wells were delivered within the 2024 drilling program, of which 14 are producers, 3 water injectors, 1 gas injector and 1 cuttings re-injection well. Three Azeri Central East (ACE) wells were drilled and put in production, and fourth well drilling (gas injector) is in ongoing, completion expected in February 2025.

In Pakistan, Development and production licence extension of Makori Deep (till 2032) & Mamikhel South fields (till 2027) have been successfully secured, and application for Tolanj has been submitted to the Regulator. Razgir-1 WHSF & FL (Wellhead surface facilities and flow line) project is ongoing. Makori East Secondary Compression detailed engineering is nearing completion, and compressor packages has been delivered to the site. By completing 9 production optimization jobs, production testing showed an incremental production of 0.5 mboepd (due to curtailment, not realized).

In the Kurdistan Region of Iraq, on Shaikan field, production/sales sold only to domestic markets while the ITP (Iraq Turkey Pipeline) remains shut in, and imposed export restrictions are still in force. On Pearl, drone attack in January and April resulted in production shut down and delay of the Khor Mor gas plant expansion project. Enerflex' EPC contract was terminated by the Operator and Pearl Petroleum has assumed direct control of construction.

In Egypt, field development activities continued. On North Bahariya concession 4, and on Ras Quattara concession 1 development well have been drilled and put in production. The well that was drilled in 2023 on Ras Quattara concession has been tested, completed and started with production in 2024. Additionally, 9 well workovers on Ras Quattara concession and 9 on West Abu Gharadig concession were performed in order to maintain basic production.

3.4 DOWNSTREAM

Segment IFRS results (HUF bn)	FY 2024	FY 2023	Ch %
EBITDA	427.4	490.2	(13)
EBITDA excl. spec. items[1]	**427.4**	**490.2**	**(13)**
Clean CCS-based EBITDA[1] [2]	**463.4**	**472.4**	**(2)**
o/w Petrochemicals[1] [2]	(32.9)	(55.2)	(40)
Operating profit/(loss) reported	**247.0**	**329.1**	**(25)**
Operating profit/(loss) excl. spec. items[1]	**247.0**	**329.1**	**(25)**
Clean CCS-based operating profit/(loss)[1] [2]	**283.1**	**311.3**	**(9)**
CAPEX (organic)	**316.0**	**218.3**	**45**
o/w transformational	56.5	68.7	(18)

MOL Group without INA	FY 2024	FY 2023	Ch %
EBITDA excl. spec. items[1]	440.6	493.5	(11)
Clean CCS-based EBITDA[1] [2]	**451.5**	**477.3**	**(5)**
o/w Petrochemicals clean CCS-based EBITDA[1] [2]	(32.9)	(55.2)	(40)
Operating profit/(loss) excl. spec. items[1]	287.8	356.3	(19)
Clean CCS-based operating profit/(loss)[1] [2]	**298.7**	**340.1**	**(12)**

INA Group	FY 2024	FY 2023	Ch %
EBITDA excl. spec. items[1]	(13.3)	(3.2)	316
Clean CCS-based EBITDA[1] [2]	2.2	(4.9)	n.a.
Operating profit/(loss) excl. spec. items[1]	(40.7)	(27.1)	50
Clean CCS-based operating profit/(loss)[1] [2]	**(25.3)**	**(28.8)**	**(12)**

Refinery and petrochemicals margin	FY 2024	FY 2023	Ch %
Brent-based MOL Group refinery margin (USD/bbl)	6.1	9.0	(32)
Brent-based Complex refinery margin (MOL+Slovnaft) (USD/bbl)	6.4	9.4	(32)
MOL Group Variable petrochemicals margin (EUR/t)[9]	206	144	44

External refined product and petrochemical sales by country (kt)	FY 2024	FY 2023	Ch %
Hungary	4,811	4,975	(3)
Slovakia	1,939	2,149	(10)
Croatia	2,558	2,454	4
Italy	1,510	1,384	9
Other markets	8,888	7,996	11
Total	**19,705**	**18,959**	**4**

External refined and petrochemical product sales by product (kt)	FY 2024	FY 2023	Ch %
Total refined products	**18,602**	**17,759**	**5**
o/w Motor gasoline	3,802	3,495	9
o/w Diesel	11,181	10,677	5
o/w Fuel oil	237	289	(18)
o/w Bitumen	569	566	1
Total petrochemicals products	**1,102**	**1,200**	**(8)**
o/w Olefin products	178	157	13
o/w Polymer products	848	978	(13)
o/w Butadiene products	76	65	17
Total refined and petrochemicals products	**19,705**	**18,959**	**4**

Organic CAPEX (in HUF bn)	FY 2024	FY 2023	YoY Ch %	Main projects FY 2024
R&M CAPEX and investments	196.5	130.3	51	INA: Rijeka Refinery Upgrade Project, Metathesis Project (Olefin conversion); SN: Periodical maintenance
Petrochemicals CAPEX	119.6	85.0	41	MPC: Metathesis Project (Olefin Conversion), Polyol Project; SPC: PP3 unit revamp (growth part)
Power and other	0.0	3.1	n.a.	
Total	**316.0**	**218.3**	**45**	

Change in regional motor fuel demand	Market			MOL Group sales		
FY 2024 vs. FY 2023 in %	Gasoline	Diesel	Motor fuels	Gasoline	Diesel	Motor fuels
Hungary	1	(2)	(1)	(2)	(7)	(6)
Slovakia	5	2	3	(1)	(5)	(4)
Croatia	5	1	2	8	4	5
Other	3	0	1	26	15	17
CEE 10 countries	**3**	**0**	**1**	**8**	**3**	**5**

Notes and special items are listed in Appendix I and II. Tables regarding processing and production of the refineries of MOL Group (Duna, Bratislava, INA in kt); External Refined Product Sales (kt); Crude oil product sales (kt); Petrochemical production (kt); Petrochemical sales (kt); Petrochemical transfer to Refining and Marketing (kt) are available in the annual Data Library on the company's website.

3.4.1 FINANCIAL OVERVIEW OF 2024

In 2024, Downstream achieved a Clean CCS EBITDA of HUF 463.4 bn (USD 1,267 bn), which is 2% lower than the previous year's performance. The macro environment had a negative impact on Refining and Marketing (R&M) results with the significantly weakened refining margin in 2024, partly offset by a higher sales results. The macro environment had a negative impact on the Refining and Marketing (R&M) results with a significantly weaker refining margin in 2024, partially offset by a higher sales results. The Petrochemicals segment made a negative contribution to Clean CCS EBITDA due to the continuing downward trend in the industry.

Although mitigated, taxes continue to be a significant drag on downstream performance in 2024. The sales tax, which was introduced in 2023 based on net sales in 2022, was extended to 2024 but at a lower rate (1%) and applied in January. In addition, the CO2 tax at the rate of 36 EUR/tCO2 was levied on MOL Plc. and MPC for the second consecutive year. The narrowing trend of the Ural-Brent spread continued, but the deductible floor of the tax was changed from USD 7.5/bbl to USD 5/bbl with effect from 1 August 2024.

The refining margin averaged around 6.1 USD/bbl in 2024 with 32% decrease in comparison to the base period, influenced by the lower fuel crack spread and the narrower Urals-Brent spread. This was offset by the higher processed volumes and increased sales. In Hungary both sales and demand decreased in 2024. Similarly in Slovakia, the sales decreased compared to the base year despite the higher demand. In 2024, Croatia and other countries experienced higher demand and a significant increase in sales. Despite the volatile external environment and unplanned events, MOL Group ensured stable and sufficient market supply in domestic markets throughout the year.

The MOL Group's integrated petrochemical margin averaged 206 EUR/t, representing a 44% increase year-on-year, mainly due to the widening polymer-monomer spread and lower energy prices in the first half of the year. Nevertheless, the Petchem segment had a negative impact on the overall performance of Downstream, due to the low demand and increased turnarounds. Total investments in the Downstream business unit reached HUF 316 billion, representing a 45% increase compared to 2023. About 60% of this amount was spent on Refining and Marketing projects. Strong efforts were also made to comply with EU sanctions and regulations, with the crude diversification program a key factor in investment decisions.

In terms of ongoing transformational projects, the hot-commissioning phase of the Polyol project was successfully completed on schedule in 2024. The Rijeka Refinery upgrade project (RRUP) reached 92.2% completion despite unfavourable external factors, such as labour shortages and increased construction materials prices.

3.4.2 OPERATIONAL OVERVIEW OF 2024

To effectively adapt to the changes in the external environment, including the Russia-Ukraine war, the more ambitious climate targets, new EU regulatory frameworks and the changing customer preferences, MOL Group has updated its long-term Shape Tomorrow Strategy. The strategic initiative aims to make the MOL Group more efficient, sustainable, chemical-focused and competitive while striving to achieve net-zero carbon emissions by 2050. Under the new strategy, crude diversification, CO2 emission reduction, sustainable chemical transformation, circular economy, renewable fuels and green H2 will be the focus of the Downstream business. In 2024, one of our primary focus was to guarantee stable and sufficient market supply within the core region and to comply with the EU sanctions during our operations. The crude diversification program started in 2022 and continued in 2024 and is on schedule at the Danube Refinery, Slovnaft and Logistics. Full Compliance has been achieved in 2024, and alternative crude oil processing has been increased at the Bratislava and the Danube refineries.

In 2024, Mol and Slovnaft successfully processed 7 additional new types of crude oils and their various blends in the volume of 1140 kt as part of the crude oil diversification program.

Total crude processing reached 13.4 million tons in Refining, 0.4 million tons below the 2023 level. **Production** closed the year with moderate overall availability in Refining (91.6%) and Petrochemicals (85.2%), both slightly below target levels. The Life Time Assessment/ Life Time Extension (LTA/LTE) projects will continue to enhance operational availability in the Petrochemical section and will be extended to Refining. Since 2020, energy consumption has been reduced by an exceptional 0.5-0.6% per year, and we will continue to focus on this area moving forward. In 2024, cooperation with the University of Pannonia in Veszprém has been strengthened, leading to joint efforts in the processing of waste-based polymers, various chemical recycling methods, and the analysis of bio- and synthetic fuels. In 2024, **Downstream Research & Development** continued its activities and projects across three main product fields: Polyols, Polyolefins, and Refining. Polyol R&D successfully completed the development of product recipes and grades for the upcoming production start-up . We extended the polyurethane application development know-how to ensure the necessary support for MOL Group's future customers for polyols. Our Polyol R&D team is actively engaged with potential customers to prepare the ground for the market entry. In the Polyol area, the team is also examining recycling opportunities in the spirit of sustainability. In the Polyolefin area, the focus was to continue the portfolio transformation into a more sustainable one. The active portfolio management allowed us to extend the co-operation framework through the whole Petchem product line, including waste-management activities. Next to the main focus we started to work on the development of specialized, low-volume materials with strict quality requirements, often referred to as "high-performance" polymers, which are serve specific, niche applications. To meet the future demand of low-carbon fuels, diversify the feedstock portfolio, and accelerate the conversion to a circular economy, several small-scale co-processing lab reactor tests were successfully completed. Following the successful laboratory tests, we transitioned to unit scale test run. The focus was put on waste-based fraction and new waste-based/advanced feedstocks to produce a higher proportion of non-crude-based middle distillates. We also continued the co-operation with international partners in the field of rubber bitumen production and successfully completed our project converting heavy fuel oil to non-fuel products.

In **Logistics**, the primary focus was on customers' satisfaction by providing competitive services, adapting to the everchanging environment, and transforming into a sustainable operation driven by engaged employees. Although 2024 was a challenging year, Logistics still managed to achieve success in many fields. As part of the Distribution Network Optimization, we reopened the new truck loading station in Stožok. We also continued on our digitalization path, with launching Bottomline software, which unifies the secondary road transportation involving MOL, Slovnaft and INA. The first milestone was the Hungarian implementation and preparations for the Slovnaft and INA roll-out also started. After Bratislava and Kľačany we have expanded remote controlled operation for truck loading stations in Horný Hričov and Stožok.

In terms of investments, we got green light for the Diesel and Naphta Interconnector pipeline development, which will connect the refineries in Százhalombatta and Bratislava bringing major efficiency in the future. Pipeline transportation got also in spotlight when we introduced the premium gasoline transport via pipe between Bratislava and Kľačany that brings cost savings.

Sustainability is also a key driver in Logistics, with the renewed INA fleet and decreasing fuel consumption we have also been able to achieve savings in GHG emissions.

Value Chain Management (VCM) provides the operational framework and sets the long term development path of MOL Group Downstream. Key focus areas include setting the DS strategy and optimization framework for short and long term, while providing management support, as well as feedstock sourcing and trading, risk management, scheduling and customer service operations. In 2024, VCM focused on supply security in a changing external environment. In line with EU sanctions, MOL Group aims to increase its seaborne crude processing in both of its landlocked refineries. VCM contributes to this goal by securing the needed seaborne supply to meet the embargo and optimization goals. New Chapter organization changes were adapted in INA as well, resulting in the establishment of INA VCM, with smooth transition from C&O. Further progress was made by the launch of New Cycle of Growing Professional Skills (GPS) Development Program, which involves the largest white collar population area in Downstream. More emphasis was put on customer service processes and digitalization.

Group Fuels business unit oversees the fuel value chain of MOL Group in 12 countries with the help of more than 700 people, including market supply, sales optimization, and sales activities across all downstream markets. Collaborating with Group Downstream Value Chain Management, it focuses on maximizing fuel margins and coordinates the management of fuels, fuel cards, biofuel compliance, and other refined products at the subsidiary level. The product portfolio includes motor gasolines, diesel and other gas oils, fuel oil, bunker fuel, sulphur, JET fuel, coke, biofuels, and fuel card management with digital solutions. In 2024, the business unit achieved record margins and record volume in wholesale, and an all-time high margin revenue on fuel cards. In response to geopolitical uncertainties, we prioritized supply security to ensure stable operations. Group Fuels maintained its position within the region and significantly strengthened its foothold in the Polish and Slovenian markets by integrating the acquired companies, further enhancing operational efficiency and market presence.

Group Chemicals oversees the sale of over 2 million tons of chemicals products in more than 200 different product grades. We serve 2,500 customers in six segments (from automotives to packaging) in 55 countries on 4 continents. For many of the products we sell, we are in the top 10 market players in Europe.

Polymer sales volumes reached 846 kt in 2024, which represents a decrease of 13% (-130 kt) compared to 2023. The primary reason of the sales decline was an intense maintenance period focused on lifetime extension and capacity increase. Additionally, polymer market was impacted by reduced plastic producer consumption. This downturn was largely attributed to high energy costs and sluggish end product demand in key sectors in Europe. Despite these challenges, we remained committed to our customers and prioritizing their needs.

Base chemicals sales volume was 707 kt in 2024, slightly above 2023. We managed to maintain our market presence and gain extra 6 mn USD margin (overall 312 mn USD) compared to 2023 by contract renegotiations, customer portfolio optimization and margin driven decision making, despite challenging external environment (weak European demand in some segments and still high energy prices, strong European and Asian import competition) and due to some internal difficulties (unplanned S/Ds, lower cracker operating rates).

Polyol Complex

Polyol complex inauguration ceremony took place in May 2024, marking an important milestone for the project. Hot commissioning was successfully completed for all units and the project has entered the start-up phase.

The hydrogen peroxide plant has been successfully started up and reached on-spec product output. Although the propylene oxide unit will be operational in Q1 2025, imported propylene oxide has already been utilized for propylene glycol and polyol production trials. The first trial run on one of the four polyol production lines was completed in December 2024.

RRUP Project

The objective of the RRUP project is to upgrade the Rijeka Refinery and to invest in the construction of a Delayed Coker Unit, along with the necessary additional refinery assets, to achieve the highest level of profitability for the refinery via enabling processing of heavy residues, minimizing black product yield and maximizing the production capability of the valuable white products. Despite the challenging business environment created by the geopolitical crisis, which has affected the availability and costs of materials, energy and workforce, the Rijeka Refinery Upgrade Project, continues to make progress. The project is currently 92.2% complete overall, with construction at 88.8% completion, procurement above 99.9% completion, and the engineering phase finalized.

3.4.3 DOWNSTREAM FUTURE PRODUCT PORTFOLIO

MOL Group Downstream is in a continuous process of developing its future product portfolio, launching new products and services that not only mitigate low-carbon transition risk, but capitalize on opportunities created by a carbon constrained, circular economy.

Biofuels in MOL Group

MOL Group's biofuel purchase with regards to both supply points (9 countries) and concluded amount (>600 kilotons) remained stable in 2024 as the national transport compliance mandates did not or hardly changed in its core countries compared to 2023.

The group of bio components used is similar to that used in the previous year: food- & waste based bioethanol and fatty acid methyl esters are still serving as basis for decarbonization of our fuels. In addition, bio components made of advanced feedstocks are further increasing in our portfolio: MOL Group successfully processed such materials in its co-processing units in Százhalombatta and Bratislava, illustrating the continuous development of MOL Group’s co-processing program as well.

In addition to blending and co-processing operations, MOL Group also sold 100% renewable diesel (called Hydrotreated Vegetable Oil or HVO) in growing volumes at selected wholesale and retail outlets.

Regarding aviation, all necessary preparations were carried out to ensure the seamless start of supplying industrial quantities of Sustainable Aviation Fuel from January 2025 to over 5 airports, on both road and rail.

Following the **Biogas** roadmap and leveraging our gained experience in the field with the 2023 acquisition of Szarvas biogas plant, MOL Group continued to scale up its activities in the biogas value chain. We started the preparation to upgrade Szarvas plant to produce biomethane and enable its injection into the local natural gas distribution system operator network. Additionally, final investment decision was made and construction has commenced on a new greenfield biomethane plant in Sisak, Croatia, with production expected to begin by the end of 2026. We are also investigating new organic and inorganic project opportunities to further facilitate value chain growth in all three core countries, Slovakia, Croatia and Hungary.

As **Hydrogen** has become a key tool for decarbonization in the European Union, MOL Group has continued to develop its competencies in this value chain. In April 2024, the company inaugurated its first electrolyzer at the Danube Refinery. This new 10 MW green hydrogen facility can produce 1,600 tons of clean hydrogen annually, decreasing GHG footprint of the refinery by 25 kilotons annually, making it the largest operating renewable hydrogen production facility in the CEE region. Additionally, similar 10 MW pilot projects have started in Rijeka, targeting RRF grants to build further operational knowledge and support market development across the region. An industrial scale-up green hydrogen production project is in preparatory phase to further decarbonize our refinery operation and comply with expected REDIII rules beyond 2030.

MOL **Recycling and Compounding** initiatives were heavily impacted by external factors such as high energy prices, economic downturn, and the petrochemical cycle. These trends also affected MOL Group's LDPE plastic recycling company, ReMat Zrt., leading to a significant decline in sales revenue. Consequently, improving ReMat’s financial and operational performance became the main focus. To combat these externalities and envision our future development targets, we have updated our recycling strategy. Regarding compounding, the German-based Aurora Kunststoffe GmbH was also affected by the decline in overall polymer demand caused by slowdowns in the automotive, construction, and other sectors during the downcycle.

3.5 INNOVATIVE BUSINESSES AND SERVICES (14)

3.5.1 Consumer Services

Consumer Services Segment IFRS results (HUF bn)	FY 2024	FY 2023	Ch %
EBITDA	271.0	244.8	11
EBITDA excl. spec. items[1]	**271.0**	**244.8**	**11**
Operating profit/(loss) reported	193.8	122.0	59
Operating profit/(loss) excl. spec. items[1]	**193.8**	**183.3**	**6**
CAPEX	**62.8**	**181.3**	**(65)**
o/w organic	62.8	66.0	(5)

Consumer Services Total retail sales of refined products (kt)	FY 2024	FY 2023	Ch %
Hungary	1,395	1,493	(7)
Slovakia	830	816	2
Poland	671	717	(6)
Croatia	1,497	1,423	5
Romania	806	787	2
Czech Republic	503	501	0
Other[8]	849	714	19
Total retail sales	**6,551**	**6,451**	**2**

Non-fuel indicators	FY 2024	FY 2023
Non-fuel margin share of total margin	36.8%	34.2%
Number of Fresh corner sites	1,329	1,253

Notes and special items are listed in Appendix I and II.
Tables regarding the number of MOL Group service stations, retail sales of refined products (kt) and gasoline and diesel sales by countries (kt) are available in the annual Data Library on the company's website.

3.5.1.1 FINANCIAL OVERVIEW OF 2024

In 2024, Consumer Services EBITDA increased by 11% compared to 2023 result, reaching HUF 271 bn. Consumer Services achieved this organic growth despite the size of the network decreasing by 4%, showing the loyalty of our customers and the strength of our non-fuel product offering. By the end of 2024, the total number of service stations are 2,330, out of that Fresh Corner sites increased by 6%, reaching 1,329 service stations. Consumer Services' simplified free cash flow contribution to the Group's has increased by 14 percent to USD 569 million in 2024.

Fuel sales also contributed to results positively, but only added USD 2 million to the year-on-year growth. Volumes decreased by 1% year-over-year, while throughput per site improved by 3%. This is in line with the 4% decrease in the size of the network. Non-fuel turnover grew by 4% while margin rose by 11% year-on-year. The non-fuel share of margin also increased year-on-year, to 36.8%.

This means that Consumer Services managed well the decrease in the size of the network and the strength of the MOL brand has kept attrition low and sold volumes across the network roughly flat

3.5.1.2 OPERATIONAL OVERVIEW OF 2024

The segment consists of two main business lines: "Retail" includes both fuel and non-fuel retailing, while "Mobility" is comprised of all other services provided for people "on-the-go".

Retail

During the years of 2022 and 2023 MOL Group has significantly expanded its network due to inorganic growth: In December 2022, MOL has entered the 10th country in Europe, Poland, by acquiring 417 service stations with the brand, LOTOS Paliwa based on a sets of agreement with PKN Orlen and Grupa LOTOS SA.; on 30th June, 2023, MOL completed the purchase of the company OMV Slovenija d. o. o., which was renamed to MOL & INA d. o. o. The change of ownership meant taking over the company's entire operations, including the entire network of OMV service stations in Slovenia. The transaction included 120 service stations across Slovenia and MOL stepped up to become the second largest market player in the Slovenian market.

In 2024, MOL maintained a leading position in the Hungarian, Croatian and Slovakian markets, achieved second place in Slovenia, Serbia, while being the third largest market player in the Czech Republic, Montenegro, Romania and in Poland as well.

We opened 15 new service stations in 2024, out of which 3 are located on highways. Major reconstruction works were completed on more than 140 stations, including forecourt, car- and jet-wash reconstructions and the rollout of the Fresh Corner concept; by the end of 2024 the total number of Fresh Corner sites rose to 1,329. Besides these bigger constructions, more than 500 gastro acceleration projects were completed during 2024 to further enhance the non-fuel transactions.

Besides, the Fresh Corner concept is constantly being developed through the continuous expansion of the gastro and grocery categories. The offering was also expanded by a wider range of convenience services (e.g. self-service and innovative payment solutions), and own branded products across the Group. French-type hot dog and quality coffee remained the core products together with other options (sandwich, bakery etc.).

Retail Customer

Consumer Services systematically collects retail customer insights and tracks overall customer satisfaction through a number of channels. As a result, MOL Group does not operate with (and therefore does not report) a single score for Retail, as several customer satisfaction scores are applied depending on the insight channel.

We maintain ongoing monitoring of our customers' behaviours on a monthly basis through a comprehensive customer insight system known as Brand Tracking. This system is operational across eight countries (as we've integrated Poland in 2024), encompassing a total of 3,000 customers per country, resulting in a cumulative 24,000 participants within MOL Group. Monthly data collection, amounting to 250 customers per month per country, is a fundamental aspect of this process. Brand Tracking provides invaluable data pertaining to brand awareness, usage patterns, overall brand performance, and 25 distinct key performance indicators (KPIs) related to fuel, gastronomy, store hygiene, loyalty programs, and staff behaviour. These insights inform the development of country-specific action plans while an important part of this tracking evaluates the effectiveness of our primary campaigns enabling continuous enhancement of their efficiency.

Emphasizing our commitment to quality, we continued product quality enhancement initiatives, facilitated by a series of product tests. For instance, our fuel quality assessments involve collaboration with DTC Austria, while blind taste tests conducted by third-party agencies evaluate key food offerings such as coffee, hot dogs and own brand products.

Furthermore, we have continued to refine our product range and offerings based on insights gained from one-off ad-hoc research such as the repetition of our Fresh Corner Usage & Attitude (U&A), which is MOL Group's most extensive research endeavour conducted in 2020 and 2024. These latest Fresh Corner U&A engaged more than 3000 customers across six countries through qualitative and quantitative methods as well, enabling us to better understand the latest customer expectations and shopping habits. Beside that we had several thematic researches on our loyalty Customers base in order to get to know in details their preferences regarding gastro products, own brands or our MOVE loyalty program. Insights derived from these research endeavours drive a more customer-centric decision-making process, thereby supporting the retail transformation of the Group. Notable developments resulting from these insights include the further development of our gastronomical range (such as in-out hot dog flavours, pizza wrap introduction), own brand product developments, optimized loyalty activities.

To gain deeper insights into the evolving needs of our loyal customers and respond promptly to their changing habits, we have implemented an internal research system to obtain rapid feedback from members of our loyalty programs. The continuous refinement of our offerings and loyalty functionalities are informed by these insights.

MOL's customer loyalty program constitutes a key element in the digital transformation of Consumer Services. MOL MOVE, the digital, gamified, tier-based rewards program has been introduced in 8 markets (Croatia, Slovenia, Hungary, Czech Republic, Slovakia, Poland, Romania and Serbia). The platform enables MOL Group to provide personalized and highly automated communication with an omnichannel approach. With the help of the new program, the number of mobile application downloads increased to almost 5 million representing a 7-times growth from 2021. During the last period, we significantly evolved our internal capabilities in gamification, integration of 3rd party propositions and personalization. We have successfully tested the use of artificial intelligence, and we are in the process of scaling this capability to provide a hyper-personalized experience and offering to our customers. Furthermore, we have also made it possible for our customers to use MOVE when they use the MOL network abroad – by cross-border point collection and offers – creating a real regional experience across 8 countries. We are proud that MOL MOVE was awarded the best loyalty program in CEE incl. Turkey for the second time in a row at the prestigious International Loyalty Awards.

MOL consciously uses mystery shoppers (selected through tender) when measuring customer satisfaction across different channels to avoid internal biased systems. Digitization is also increasingly present in our internal operation via the extensive use of Artificial Intelligence and Machine learning-based tools and also support the execution via our online, gamified learning tool, eSMILE.

E-smile

As a consumer facing business, employee engagement plays a major role in the transformation of Consumer Services and enhancing customer experience. In 2017 MOL Group introduced a face-to-face training program called 'Smile' for service station staff, covering both hosts and station managers, with the aim to improve customer service. In 2020 MOL Group expanded employee training and development through a digital microlearning training platform called eSMILE, which is available on their smart phones. The mobile training platform expands the Group's training portfolio on product, process, sales, compliance and HSE relevant topics and reinforces previously shared knowledge. Furthermore, the platform connects the Group directly to each member of staff working at the Group's service stations. It allows real-time communication from head office about the latest sales promotions, company updates and it was especially important during the pandemic, when we were able to share the latest operational changes, ensuring a safe working environment and safe consumer experience. Since 2021 the platform also supports new-hires in their onboarding experience, helping them hit the sales floor with higher confidence and shorter preparation.

In 2023, the Customer Service Protocol was introduced, a 5-step method designed to make life easier for our hosts by guiding them on which products to focus on and how to become proactive in selling. With MOL Group expanding to Poland last year, eSMILE now has more than 19,000 service station employees.

The platform is based on gamification elements which boosts employee engagement and wellbeing at the workplace. This results in a stable-high usage of the platform, with 96% of frontline staff using eSMILE every day when at work, resulting in an average 17% increase in knowledge from the training topics. These programs not only support the transformation of the Group's service station network from fuel retail into FMCG retail but also the continuous increase of non-fuel revenues.

In 2024, a Customer Service Protocol was fully implemented in every sales and marketing campaign to ensure a standardized approach to serving customers, with the primary goal of increasing gastro product sales. The results showed improvement through the introduction of monthly focus items, which effectively boosted customer engagement and sales performance.

Mobility

In 2018, MOL Group launched MOL Plugee, a new EV charging brand under the Consumer Services division. By year end 2024, 278 MOL Plugee EV chargers were installed throughout the Group's service station network across the CEE region. In 2024 MOL Group installed 5 ultra-fast and 5 DC charger solutions on 6 existing and on 2 new locations in Hungary. MOL Group launched its application-based service in Hungary in 2020 and in Slovenia, Slovakia, Czech Republic, Croatia and Romania in 2021. At the end of 2024 it enabled our more than 55,000 registered Plugee users and other customers to have a seamless charging experience in 6 countries thanks to the late summer introduced European roaming activity. Next to the European roaming, this year MOL Plugee launch the virtual fuel card for B2B partners which highly supports the electrification of the business sector. Energy consumption for all EV chargers in 2024 reached 2,200 MWh, saving a total of above 660 tonnes of CO2-eq.

In 2018, MOL Group launched a car sharing service in Budapest (Hungary) called MOL LIMO. By the end of 2024, a fleet of 600 shared cars from 13 different models (2 electric, 5 hybrid, 6 ICE) were in operation, number of electric and hybrid vehicles were 260. In 2024, MOL LIMO introduced three new models to its fleet, the Toyota Yaris Cross Hybrid, Toyota Corolla Cross Hybrid and Opel Movano. The client base is continuously growing, until the year-end total number of registered users reached approximately 150 thousand. Energy consumption of all LIMO EVs reached 40,500 kWh in 2024, saving an equivalent of around 12 tonnes of CO2-eq. per year.

KEY MOL LIMO SUSTAINABILITY FIGURES	UNIT OF MEASURE	FY 2024	FY 2023
Average fleet size	number of vehicles	563	478
o/w electric	percentage	3	5
Average vehicle age at year end	in months	36.6	35.6
Vehicles rated by Euro NCAP programs with an overall 5-star safety rating	percentage of fleet	60	36
Vehicles recalled during period	number	0	0

As part of MOL Group's mobility strategy, a fleet management service called MOL Fleet Solution was launched in 2018. The main target is to finance and manage vehicles owned and used by MOL Group and external clients, as well as the fleets of small-, medium-sized or large businesses in Hungary. At the end of 2024 MOL Fleet Solution was merged with one of the biggest Hungarian fleet management company, Mercarius. By this merger, MOL Mercarius was born, with the number of financed and managed cars reaching almost 20,000.

KEY MOL FLEET SUSTAINABLITY FIGURES	UNIT OF MEASURE	FY 2024	FY 2023
Average fleet size	number of vehicles	6,911	5,841
o/w electric and hybrid	percentage	8.08%	8.0%
Average vehicle age at year end	in months	31.93	37.0
Vehicles recalled during period	number	0	365

Neither MOL Limo nor MOL Fleet Solutions registered any incidents concerning a) non-compliance concerning product and service information and labelling, and/or b) non-compliance with marketing communication during 2024. Finally, no incidents or complaints concerning breaches of customer privacy and/or losses of customer data as a result of data breaches were registered at neither MOL Limo nor MOL Fleet Solutions during 2024.

3.5.2 GROUP INDUSTRIAL AND CORPORATE SERVICES

The organization oversees Group Maintenance Services Management, Group Renewables & Energy Efficiency, ITK Group, as well as Group Procurement and Asset & Services Management

In 2024 high complexity turnarounds have been delivered in Danube Refinery, Slovnaft and Rijeka Refinery with high cross-country maintenance execution. In Rijeka Refinery Maintenance services are arranged for continuous maintenance. The Maintenance Single Service Companies focused on scope delivery within the planned budget and timeline while focusing on keeping the lowest possible Health & Safety incidents. Group Maintenance successfully implemented organizational standardization and enhanced scheduling transparency.

Group Renewables successfully expanded their portfolio with Ballószög solar farm acquisition. In 2024 EBITDA generation was above the plan thanks to high cost control despite of a less favourable environment. Renewables team made progress with solar developments in Algyő and Tiszaújváros (MPK). In Hungary Group Energy Efficiency delivered ISO50001 compliance and met the EKR obligation with high percentage of internal efficiency projects.

ITK Group successfully revised their current core businesses and paused manufacturing. From the end of the year the core public transportation services bring positive results.

Group Procurement dedicated significant effort to maintain the quality of existing procedures and adapt them to meet new external and internal demands, with a strong focus on sustainability. EBITDA contribution with cost saving was 117% of the yearly target.

3.5.3 GROUP OILFIELD DEVELOPMENT & SOLUTIONS

Due to the ongoing geopolitical situation and economic uncertainties, securing oil and gas supply remained a priority, therefore the business need for Oil Field Service (OFS) companies was equally important as last year. OFS companies generated significant 3rd party engagements in 2024 from geothermal works, Offshore engagement in Croatia and well services. Location, staff, maintenance and operation management optimization was continued among OFS companies, cross-border utilization of the assets was managed. Service flexibility was still the key to serve the changed, uncertain business requirements and the increased workload. Several actions were taken to optimize CAPEX and OPEX in a business environment burdened in crisis of war, high energy prices and price inflation.

Oilfield Chemicals and Technologies successfully restructured and delivered new contracts by the end of the year related to enhanced oil recovery (EOR).

3.5.4 CIRCULAR ECONOMY SERVICES

Segment IFRS results (HUF bn)	FY 2024	FY 2023	Ch %
EBITDA	(20.3)	13.2	n.a.
EBITDA excl. spec. items(1)	**(20.3)**	**13.2**	**n.a.**
Operating profit/(loss) reported	(33.4)	11.7	n.a.
Operating profit/(loss) reported excl. spec. items(1)	**(33.4)**	**11.7**	**n.a.**
CAPEX and investments	**34.1**	**22.1**	**54**

Notes and special items are listed in Appendix I and II.
Circular Economy Services was not a standalone segment in 2023 and operation in the first half of 2023 was mostly limited to expenses related to setting up the business.

Full year 2024 results

Circular Economy Services delivered a loss on EBITDA level in 2024, amounting to HUF -20.3 bn (USD -51.9 mn). Since the segment's first company, MOHU Zrt. was only established with the launch of the concession, and thus started operating on 1 July 2023, there is no equivalent basis for comparison versus 2023. The change, as compared to 2023 results, and the final result is mainly attributable to extra operating costs materializing along with the start and then the ramp-up of the Deposit Refund System (DRS) in the third and fourth quarters of the year, and an impairment on trade receivables related mainly to the public services and EPR subsystems. Additionally, the full year results of 2024 include an accounting one-off of HUF 9.7 bn (USD 30 mn), related to lower-than-expected EPR revenue realization of 2023.

In 2024, the segment was extended by a series of inorganic activities. MOHU Budapest, the joint venture owned by BKM Budapesti Közművek and MOL in a 50-50% ownership structure, started its operation as of 1 April 2024, proceeding with its operation, waste management activities in Budapest and Pest County with approximately 1,900 employees and 500 vehicles. During the second half of the year, three further transactions were carried out, aimed at establishing a stronger foothold for circular economy activities; Greenpet Recycle Kft. and Vivienvíz Kft. to build up food-grade PET recycling capacities, and RE-POL Innovációs Kft. to enter the tire recycling market.

CES business development

In 2024, Circular Economy Services segment's organic capital expenditure amounted to HUF 30.7 bn (USD 83.1 mn). The spending was mostly directed to the initiation or advancement of numerous projects aimed at the intensification of selective waste collection within the scope of MOHU's activities, many of which already started in 2023. The implementation of the DRS system, which initially started its operation on 1 January, continued, reaching full speed after the grace period ended with 1 July. By the end of the year, approximately 3,200 reverse vending machines (RVMs) were installed, amounting for 3,700 deposit stations by the end of the period, and handling 6 million bottles and cans per day in the last quarter. A further 1,500 manual takeback points have been contracted to increase national coverage of the system. Bio kitchen waste collection has been introduced from 1 January as a pilot project in all 6 waste management regions, at 14 different settlements, with all of the planned 200 thousand collection containers delivered. A nation-wide rollout of the textile waste collection extension project meant that out of the 1,500 containers ordered, 1,100 have already been installed. While the first own waste yard investment in Esztergom had been completed and started its operation, the succeeding projects are under preparation. Purchase of 100 waste collection vehicles were contracted, of which 41 have already been delivered.

3.6 GAS MIDSTREAM

Segment IFRS results (HUF bn)	FY 2024	FY 2023	Ch %
EBITDA	89.0	93.8	(5)
EBITDA excl. spec. items[1]	**89.0**	**93.8**	**(5)**
Operating profit/(loss) reported	72.4	76.4	(5)
Operating profit/(loss) reported excl. spec. items[1]	**72.4**	**76.4**	**(5)**
CAPEX and investments	**17.8**	**12.4**	**44**
o/w organic	17.8	12.4	44

Key Gas Midstream ESG Indicators	Unit of measure	FY 2024	FY 2023
Total Direct GHG emissions (scope 1)	mn tonnes CO_2 eq	0.1	0.1
Volume of Spills (> 1m³)	m³	0	0
Lost Time Injury Frequency (own staff)	per 1 mn worked hours	0	0.87

Tables regarding transmission volumes (million cmc) are available in the annual Data Library on the company's website.

3.6.1 FINANCIAL OVERVIEW OF 2024

FGSZ Földgázszállító Ltd. (hereinafter referred to as: FGSZ) reached HUF 89.0bn EBITDA in 2024 following a 5% decrease from 2023. The financial result was mainly determined by mainly macroeconomic drivers (ie. fluctuating energy prices, inflation pressure), robust demand for transmission activities and nevertheless changes in regulated tariffs.

Transmission volumes totalled on a similar level to prior year (higher by 1% in 2024):, while aggregated domestic transmission decreased, export transmission to neighbouring countries almost doubled in 2024 on YoY basis. The decrease in total domestic volumes (by nearly 18%) was mainly due to the lower transmission to gas storage facilities (cca. 1.6 bcm), in relation with the milder heating season in early 2024 resulting in higher average stock level, while domestic consumption was similar to prior year level. Regional gas supply routes have changed, and the Southern gas supply route became more important in the gas supply of Slovakia and Ukraine, which resulted in the significant increase in cross-border flows, as the export transmission demand towards neighbouring countries (e.g. Croatia, Romania, Slovakia, Serbia and Ukraine) almost doubled in 2024 compared to prior year.

Regulated revenues decreased by ~7% YoY mainly due to the calming market conditions and changes in capacity demands of system users. Average regulated tariffs were lower than in the prior year, mainly reflecting the challenges of the external economic environment. Despite of the increased cross-border flows, additional demand for cross-border transmission decreased from an outstandingly high level as the ratio of long term – annual and quarterly – capacity bookings increased within the capacity portfolio of system users. Operating expenses were lower by 11% YoY in line with lower gas consumption costs of the transmission system, while other OPEX elements (e.g. costs of maintenance activities) were affected by persistently elevated inflation rate. Strict cost control smoothened the overall impact of the operational expenditures.

The total value of CAPEX and investments increased by 44% YoY. In 2024 CAPEX spending covered mainly sustain-type projects (e.g. pipeline rehabilitation, reconstruction of compressor units) and the completion of Kardoskút-Városföld pipeline reconstruction project, at the same time to support the green transition FGSZ also completed projects in relation to renewable gases and energy efficiency.

3.6.2 OPERATIONAL OVERVIEW OF 2024

FGSZ is the sole operator of the nearly 6,000 km long high-pressure natural gas transmission system in Hungary, and as a natural monopoly it operates on a regulated basis governed by EU and national law. The Company's main activity is the construction, operation, and allocation of natural gas transmission capacity, of which it offers yearly, quarterly, monthly, daily, and within day firm and interruptible capacities through online auctions. FGSZ delivers domestic gas production and imported supplies to gas distribution companies, power plants and large industrial consumers, and it also carries out cross-border gas transportation activities besides domestic gas transmission. It operates bidirectional interconnection points with Slovakia, Ukraine, Romania, Serbia, and Croatia and unidirectional entry point from Austria.

The security of supply of Hungary is inseparable from the energy security of the broader CEE region and the whole of Europe. Therefore, FGSZ aims to ensure the smooth interoperability of the natural gas transmission networks of the region, and it also aims to increase transmission flows through Hungary The developments of the transmission grid and trade infrastructure implemented by FGSZ in the recent years helped Hungary and the broader region as well in reaching a more competitive gas market while increasing security of supply and making natural gas even more accessible as a lower carbon alternative in – among others – electricity generation.

To further enhance regional gas market integration, FGSZ completed several important agreements and developments on its network in 2024. The technical capacity of the Hungarian-Slovak interconnection point was increased twice during 2024 towards Slovakia (from 200 tcm/h to 300 tcm/h, then as a pilot to 400 tcm/h until April 2025) to meet the intensifying market demand. Also from June 2024 the technical capacity of the Hungarian-Ukrainian interconnection point was increased (from 327 tcm/h to 400 tcm/h) within the pilot period.

As of 17 December 2024, FGSZ became a strategic investor of the Hungarian gas exchange, Central Eastern European Gas Exchange Ltd. (CEEGEX), getting involved in its further development, growth and stability. FGSZ also works on internal system development, new entry points also support the further increase of domestic gas production.

FGSZ places a strong emphasis on sustainability and tasks related to the green transition. In 2024, exploring the adaptation of the existing transmission system to changing needs and to the transport of renewable gases continued to be of crucial importance. To make the current operations more sustainable, FGSZ has incorporated methane leakage detection and repair activities into daily operations to reduce greenhouse gas emissions. In addition, technological processes are in constant development, which resulted flaring is preferred to blowing off, as most of the methane emissions will be converted to CO_2 which reduces climate impact.

The Regional Booking Platform (RBP) of FGSZ is an online platform application developed in accordance with the EU network code governing the capacity allocation mechanisms used in natural gas transmission networks and with other relevant EU and national legislation. The capacity allocation application enables capacity allocation procedures and secondary capacity trading among other services. Today – beyond FGSZ – sixteen further transmission system operators or storage operators use it partially or entirely on their system capacities throughout the EU and the Energy Community: Eustream (Slovakia), Transgaz (Romania), Plinacro (Croatia), Bulgartransgaz (transmission and storage, Bulgaria), DESFA (Greece), Gas Connect Austria (Austria), Gascade (Germany), Ontras (Germany), Gaz-System (Poland), Gas TSO of Ukraine (Ukraine), Gastrans (Serbia), NEL Gastransport (Germany), ICGB (Bulgaria), Hexum (storage, Hungary), Vestmoldtransgaz (Republic of Moldova) and Moldavtransgaz (Republic of Moldova).

4. APPENDICES

APPENDIX I - IMPACT OF SPECIAL ITEMS ON OPERATING PROFIT AND EBITDA

Special items are one-off items that are single, significant (more than USD 10 million P&L effect), non-recurring economic events which are not considered as part of the core operation of the segment therefore they do not reflect the actual performance of the given period.

	HUF million			USD million		
Special items - operating profit	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
Operating profit excl.spec.items from continuing operation	**603,824**	**722,801**	**(16)**	**1,663**	**2,026**	**(18)**
Upstream	**(18,952)**	**21,898**	**n.a.**	**(48)**	**63**	**n.a.**
Impairment on Upstream assets in the Group	(18,952)	(3,654)	**n.a.**	(48)	(10)	**n.a.**
MOL Plc Decommissioning liability revision estimate		16,904	n.a.		48	**n.a.**
INA Decommissioning liability revision estimate		8,648	n.a.		25	**n.a.**
Corporate and other		(5,867)	**n.a.**		**(16)**	**n.a.**
ITK goodwill impairment		(5,867)	**n.a.**		(16)	**n.a.**
Consumer Services		**(61,257)**	**n.a.**		**(175)**	**n.a.**
Impairment of Retail assets		(61,257)	**n.a.**		(175)	**n.a.**
Total impact of special items on operating profit from continuing operation	**(18,952)**	(45,226)	**n.a.**	**(48)**	**(129)**	**n.a.**
Operating profit from continuing operation	**584,872**	**677,575**	**(14)**	**1,615**	**1,898**	**(15)**

Special items - EBITDA	**FY 2024**	**FY 2023**	**Ch %**	**FY 2024**	**FY 2023**	**Ch %**
EBITDA excl.spec.items from continuing operation	**1,091,314**	**1,123,707**	**(3)**	**2,992**	**3,162**	**(5)**
Upstream		**25,552**	**n.a.**		**73**	**n.a.**
MOL Plc Decommissioning liability revision estimate		16,904	n.a.		48	n.a.
INA Decommissioning liability revision estimate		8,648	n.a.		25	n.a.
Total impact of special items on EBITDA from continuing operation		**25,552**	**n.a.**		**73**	**n.a.**
EBITDA from continuing operation	**1,091,314**	**1,149,259**	**(5)**	**2,992**	**3,235**	**(8)**

APPENDIX II – NOTES

Number of footnotes	
(1)	Special items that affected operating profit and EBITDA are detailed in Appendix I.
(2)	MOL Clean CCS methodology eliminates from EBITDA/operating profit inventory holding gain / loss (i.e.: reflecting actual cost of supply of crude oil and other major raw materials); impairment on inventories; FX gains / losses on debtors and creditors; furthermore, adjusts EBITDA/operating profit by accurate CO2 cost recognition and capturing the results of underlying commodity derivative transactions.
(3)	Figures have been calculated by converting the results of each month in the period on its actual monthly average HUF/USD rate.
(4)	Net gearing: net debt divided by net debt plus shareholders' equity including non-controlling interests.
(5)	The previously reported Brent-Ural differential based on European Ural quotations are discontinued due to the illiquidity of European markets for the Ural blend. Although DAP India quotations reflect a more liquid market for the Ural blend, logistics costs are significantly different from European deliveries.
(6)	Net external sales revenues and operating profit includes the profit arising both from sales to third parties and transfers to the other business segments.
(7)	Intersegment transfers indicate the effect on operating profit of the change in the amount of unrealized profit deferred in respect of transfers between segments. Unrealized profits arise where the item transferred is held in inventory by the receiving segment and a third-party sale takes place only in a subsequent quarter. For segmental reporting purposes the transferor segment records a profit immediately at the point of transfer. However, at the company level profit is only reported when the related third-party sale has taken place. Unrealized profits arise principally in respect of transfers from Upstream to Downstream and Gas Midstream.
(8)	From 2016 Austrian retail operations were reclassified into wholesale.
(9)	Variable MOL Group Petrochemicals margin contains an energy cost component and is the only petrochemicals margin MOL reports starting in Q1 2024.
(10)	The methodology includes purchased energy (enhanced fit to natural gas) and CO2 costs.
(11)	FOB Rotterdam parity
(12)	FOB Med parity
(13)	Figures and analysis of Consumer Services performance are presented in chapter 3.5. ("Innovative businesses and services").
(14)	Internal corporate governance and external reporting structure of Innovative Businesses and Services are different, thus the financial result of the Industrial Services and new Ventures unit of the Innovative Businesses and Services segment is reported within „Corporate and other" segment.
(15)	Clean CCS-based EBITDA figures for 2023 with regards to the split of Downstream segment results between "MOL without INA" and "INA" were misstated in the 2023 Annual Report and was adjusted in this Report.

CORPORATE GOVERNANCE

1. INTRODUCTION WITH LINKS TO THE CORPORATE GOVERNANCE DECLARATION

MOL's corporate governance practice meets the requirements of the regulations of the Budapest Stock Exchange ("BSE") and the relevant capital market regulations. MOL Group published its Corporate Governance Report (Declaration) in accordance with Budapest Stock Exchange Corporate Governance Recommendations. The Corporate Governance Declaration can be obtained from the Group's website. This includes description, operations and work of the Board of Directors, the Supervisory Board, Chief Executives Committee and the Management Committee, as well as a range of other topics, including a description of the system of internal controls, an evaluation of the activities performed in the given period, auditor work, publication and insider trading policies, exercising shareholder rights as well as the rules for the conduct of the general meeting.

2. THE OPERATION OF THE BOARD OF DIRECTORS

2.1. BRIEF PRESENTATION OF THE OPERATION OF THE BOARD OF DIRECTORS

MOL's Board of Directors acts as the highest managing body of the Company and as such has collective responsibility for all corporate operations. The Board's key activities are focused on achieving increasing shareholder value with also considering other stakeholders' interest; improving efficiency and profitability and ensuring transparency in corporate activities and sustainable operation. It also aims to ensure appropriate risk management, environmental protection and conditions for safety at work. All decisions related to corporate governance which do not fall within the exclusive competence of the General Meeting or other corporate bodies by law or the Articles of Association belong to the competence of the Board of Directors. Given that MOL and its subsidiaries effectively operate as a single economic unit, the Board is also responsible for enforcing its aims and policies and for promoting the MOL culture throughout the entire Group.

2.2. THE DISTRIBUTION OF RESPONSIBILITIES AND TASKS BETWEEN THE BOARD OF DIRECTORS AND THE MANAGEMENT

2.2.1. OPERATION OF THE BOARD OF DIRECTORS

The Board acts and adopts resolutions as a collective body. The Board adopted a set of rules (Charter) to govern its own activities in 1991, when the Company was founded; these rules were updated in February 2022 to ensure continued adherence to best practice standards.

The Charter covers:

- scope of the authority and responsibilities of the Board,
- scope of the committees operated by the Board,
- the scope of the information required by the Board and the frequency of reports,
- main responsibilities of the Chairman and the Deputy Chairman,
- order and preparation of Board meetings and the permanent items of the agenda, and
- decision-making mechanism and the manner in which the implementation of resolutions is monitored,
- rules on conflict of interest.

Members of the Board of Directors shall sign an Annual Declaration on Conflict of Interest in accordance with the form approved by the Board of Directors simultaneously with accepting their membership, and in every calendar year 30 days prior to the date of the annual general meeting. If any conflict of interest specified in the Charter of the Board of Directors occurs with respect to the member of the Board of Directors, such member shall report in Ad hoc Declaration on Conflict of Interest to the Corporate Governance and Remuneration Committee.

The Board of Directors reviewed the publications and the publication processes of MOL Plc. and concluded that the company has robust and efficient processes in place to ensure full compliance with the BSE Corporate Governance Recommendations.

2.2.2. RELATIONSHIP WITH THE BOARD OF DIRECTORS AND MOL GROUP ORGANISATIONS

The governance of the Company is carried out in line with standardized corporate governance principles and practice, and within its framework, starting from 1 February, 2019 authorities and tasks related to the operation of the Company, furthermore certain responsibilities and tasks of strategic importance from the view of Company operations are divided between two top management committees, the Chief Executives' Committee ("CEC") and the Management Committee ("MC").

A consistent document prescribes the distribution of decision-making authorities between the Board of Directors and the Company's organizations, defining the key control points required for the efficient development and operation of MOL Group's processes.

Control and management of MOL Group is implemented through business and functional organizations. To enhance corporate governance MC provides a direct link between the CEC and the Company's work organization, vast majority of the topics discussed by the MC are related to the core operation of the Company. The President of the MC is the Group Chief Executive Officer, its members are the Group Chief Financial Officer, the Group Exploration & Production Executive Vice President, the Group Downstream Executive Vice President, the Group Consumer Services Executive Vice President, the Chief Executive Officer of Slovnaft a.s., the President of the Management Board of INA d.d., the MOL Hungary Managing Director, the Group HR Senior Vice President, the Group Strategic Operations and Corporate Development Executive Vice President and the Group Industrial & Corporate Services Vice President.

The CEC, being the regular forum of the three level 1 leaders of the Company, is established with the aim of adopting strategic decisions which do not belong in the competency of the Board of Directors or the general meeting. The CEC examines and supervises matters to be submitted the Board of Directors, furthermore, renders preliminary opinion on certain proposals submitted to the Board of Directors. The Chairman of the Chief Executives' Committee is the Chairman-CEO, its members are the Group Chief Executive Officer and the Deputy Chief Executive Officer.

Additionally, the CEC and the MC operates as a decision-making body in all questions delegated to their competence by internal regulations and which do not belong in the capacities of the Board of Directors or the general meeting in accordance with the laws and the Articles of Association. Each member of the MC and the CEC shall have one vote, decisions of the forums are passed with a simple majority of the votes.

3. INTRODUCTION OF THE BOARD OF DIRECTORS AND ITS COMMITTEES

3.1. BOARD OF DIRECTORS

The majority of the members of the Board of Directors are non-executive directors (6 out of 10 members), thus ensuring the independence of the Board from the work organization. In the course of 2024, 6 members of the Board of Directors were independent in accordance with their related declaration (based on NYSE and EU recommendations):

			BOARD AND COMMITTEE MEMBERSHIP			
Name	Status	Election Year	BOD	CGRC	FRC	SDC
Zsolt Hernádi	non-independent	24 February, 1999	CH	M		
Dr. Sándor Csányi	independent	20 October, 2000	DEP.CH	CH		
Zsigmond Járai	independent	29 April, 2010	M		CH	
Dr. János Martonyi*	independent	1 July, 2014	M	M		M
József Molnár	non-independent	12 October, 2007	M		M	
Dr. László Parragh	independent	29 April, 2010	M		M	CH
Dr. Anthony Radev	independent	30 April, 2014	M	M	M	
Dr. Martin Roman	independent	29 April, 2010	M	M		
Talal Al-Awfi	independent	30 April, 2019	M		M	M
JUDr. Oszkár Világi	non-independent	1 May, 2011	M			
Dr. György Bacsa	non-independent	23 December, 2021	M			M
	64%			80%	80%	67%

CH: Chairman / DEP.CH: Deputy Chairman / M: Member
*The mandate of Dr. János Martonyi expired on 29 April 2024.

3.1.1. PRESENTATION OF THE BOD COMITTEES' STRUCTURES

The Board operates its committees to increase the efficiency of the Board's operations and to provide the appropriate professional background for decision-making.

The committees are preparatory, advisory, opinion-forming and proposal-preparing bodies of the Board of Directors and have prior opinion-forming rights, as set out by MOL Group's List of Decision-making Authorities, in certain questions belonging to the competency of the Board of Directors and in those which are delegated to the competency of respective executive members of the Board of Directors, as the executive management of the Company.

The responsibilities and the rules of procedure of the committees are determined by the Board of Directors based on the proposal of the chairmen of the committees.

The Chairman of the Board of Directors may also request the committees to perform certain tasks.

The members and chairmen of the committees are elected by the Board of Directors. The majority of committee members are non-executive and independent.

The Board operates the following committees (date of appointment and membership below) and allocates a number of responsibilities to these committees:

Name	CGRC	FRC	SDC
Dr. Sándor Csányi	17 November, 2000		
Zsolt Hernádi	8 September, 2000		
Dr. Martin Roman	4 June, 2010		
Dr. Anthony Radev	30 May, 2014	30 May, 2014	
Dr. János Martonyi	1 July, 2014*		1 July, 2014*
Zsigmond Járai		4 June, 2010	
Dr. László Parragh		20 February, 2014	30 May, 2014
Talal Al-Awfi,		30 May, 2019	31 May, 2024
József Molnár		8 September, 2022	
Dr. György Bacsa			8 September, 2022

*The mandate of Dr. János Martonyi expired on 29 April 2024.

CORPORATE GOVERNANCE AND REMUNERATION COMMITTEE

Responsibilities include analysis and evaluation of the activities of the Board of Directors, issues related to Board/Supervisory Board membership, promoting the contact between shareholders and the Board, procedural, ethical and regulatory issues, reviewing corporate processes, procedures, and organizational solutions and compensation and incentive systems and making recommendations on the implementation of best practices.

FINANCE AND RISK MANAGEMENT COMMITTEE

The Chairman of the Board of Directors, the Chairman of the Supervisory Board and the Chairman of the Audit Committee are permanent invitees to the meetings of the Finance and Risk Management Committee. **Responsibilities** include review of financial and related reports, monitoring the efficiency of the internal audit system, review of the scope and results of the planning and audit, monitoring of the risk management system, monitoring the liquidity position of the Company, the financial and operational risks and the management thereof, review of the operation of Enterprise Risk Management (ERM) system, and monitoring the independence and objectivity of the external auditor.

SUSTAINABLE DEVELOPMENT COMMITTEE

The Chairman of the Board of Directors, the Chairman and Deputy Chairman of the Supervisory Board are permanent invitees to the meetings of the Sustainable Development Committee. **Responsibilities** to review, evaluate and comment for the Board of Directors on all proposals related to sustainable development (SD), to monitor the development and implementation of all SD related policies (e.g. HSE, Code of Ethics, etc.) and discuss ethical issues, to supervise the progress on the strategic focus areas of SD in MOL Group, to request and discuss reports from business divisions and subsidiaries about their SD performance, and to review sustainability related data and information of external reports.

4. OPERATIONS OF THE BOARD AND NUMBER OF MEETINGS FOR THE BOARD AND EACH COMMITTEE

In 2024, the Board of Directors held 6 meetings with an average attendance rate of 95%. Attendance to the Board of Directors meetings during 2024 is set out in the table below:

	BoD		CGRC		FRC		SDC	
Name	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio
Zsolt Hernádi (Chairman)	5	83%	4	80%				
Dr. Sándor Csányi (Deputy Chairman)	5	83%	5	100%				
Zsigmond Járai	6	100%			5	100%		
Dr. János Martonyi*	2	100%	2	100%			2	100%
József Molnár	6	100%			5	100%		
Dr. László Parragh	5	83%			5	100%	4	100%
Dr. Anthony Radev	6	100%	5	100%	5	100%		
Dr. Martin Roman	6	100%	5	100%				
Talal Al-Awfi**	5	83%			5	100%	2	100%
JUDr. Oszkár Világi	6	100%						
Dr. György Bacsa	6	100%					4	100%
	6	95%	5	96%	5	100%	4	100%

*The mandate of Dr. János Martonyi expired on 29 April 2024.

** Talal Al-Awfi is a member of the SDC committee since 31 May 2024.

Alongside regular agenda items, such as reports by the committees' chairmen on the activities pursued since the last Board meeting, the **Board of Directors** received updates on key strategic issues as well as an overview of capital market developments and individually evaluated the performance of each of the company's business units. The Board of Directors respectively paid attention to the follow-up of the industry macro trends, the treatment of the challenges driven by the external environment, the financial and operational challenges caused by the pandemic situation and the strategy update process.

In 2024, the **Corporate Governance and Remuneration Committee** held 5 meetings with a 96% average attendance rate. In addition to the issues of corporate governance, remuneration and the composition of the management, the Committee discussed a number of key strategic and results-related topics prior to their presentation to the Board of Directors for discussion.

In 2024, the **Finance and Risk Management Committee** held 5 meetings with an 100% average attendance rate. In addition to the regular items on the agenda, including the audit of all public financial reports, providing assistance to the auditor's work and the regular monitoring of the internal audit, the committee reviewed the major risk factors of the Company, considering the changed international financial situation and the status reports on risk management actions attached to these factors.

In 2024, the **Sustainable Development Committee** held 4 meetings with an 100% attendance rate. The Committee evaluated the accomplishment of the sustainability related actions taken in 2024. The Committee formed opinion on the annual Sustainable Development Report and on thematic reports submitted by selected business units. External evaluations made about MOL Group's sustainability performance were also reviewed.

5. INTRODUCTION OF THE SUPERVISORY BOARD AND THE AUDIT COMMITTEE

The Supervisory Board is responsible for monitoring and supervising the Board of Directors on behalf of the shareholders (general meeting). Members of the Supervisory Board shall be elected by the general meeting for a definite period, but for a maximum of five (5) years. The Supervisory Board currently consists of twelve members. In accordance with the Civil Code, 1/3 of the members shall be representatives of the employees, accordingly currently five members of the MOL Supervisory Board are employee representatives while the other seven external persons are appointed by the shareholders.

The members of the Supervisory Board and the Audit Committee and their independence status:

		SUPERVISORY BOARD		AUDIT COMMITTEE	
Name	Status	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio
Zoltán Áldott, Chairman	non-independent	5	100%		
Dr. Anett Pandurics, Deputy Chairperson	independent	5	100%	5	100%
Péter Bíró	independent	4	80%	4	80%
Dr. Lajos Dorkota	independent	4	80%		
Norbert Izer	independent	5	100%	5	100%
Dr. Péter Kaderják	independent	4	80%		
András Lánczi	independent	5	100%		
Ivan Mikloš	independent	5	100%	5	100%
Employee representatives:					
Bálint Péter Kis	non-independent	4	80%		
Dr. Sándor Puskás	non-independent	5	100%		
Kálmán Serfőző	non-independent	3	60%		
András Tóth	non-independent	5	100%		

The Chairman of the Supervisory Board is a permanent invitee to the meetings of the Board of Directors, Finance and Risk Management Committee and Sustainable Development Committee meetings.

Regular agenda points of the Supervisory Board include the quarterly report of the Board of Directors on the Company's operations and the reports of Internal Audit and Corporate Security, furthermore it is informed on other relevant topics. In addition, the Supervisory Board review the proposals for the Annual General Meeting. The Supervisory Board reviews its annual activity during the year.

In 2024 the **Supervisory Board** held 5 meetings with an 92% average attendance rate. Attendance to the Supervisory Board meetings during 2024 is set out in the table above. In 2024, the **Audit Committee** held 5 meetings with a 95% average attendance rate. Attendance to the Audit Committee meetings during 2024 is set out in the table above.

In addition to the regular items on the agenda, including the audit of all public financial reports, providing assistance to the auditor's work and the regular monitoring of Internal Audit, the Committee reviewed the major risk factors of the Company, considering the changed international financial situation and the status reports on risk management actions attached to these factors. The Audit Committee continuously monitored the Company's financial position. The Audit Committee reviewed the materials of the Annual General Meeting (i.e. financial reports, statements of the auditor). The Audit Committee participated in the procedure of selecting an auditor and made a recommendation to the Supervisory Board regarding the appointment of the auditor.

In 2006, the general meeting appointed the **Audit Committee** comprised of independent members of the Supervisory Board.

The Audit Committee strengthens the independent control over the financial and accounting policy of the Company.

The independent Audit Committee's responsibilities include the following activities among others:

- providing assistance to the Supervisory Board in supervising the financial report regime, in selecting an auditor and in working with the auditor, reviewing and monitoring the independence of the statutory auditor, monitoring the effectiveness of the Company's internal audit and risk management systems and make recommendations if necessary;
- carrying out the tasks of the audit committees of its subsidiaries which are consolidated by the Company, operate as public limited companies or issue securities admitted to trading on regulated market, if the relevant laws allow that and the subsidiary in question does not operate a separate audit committee.

6. MANAGEMENT MEMBERS OF CEC AND MC

Members of the CEC:

Zsolt Hernádi	Chairman-CEO (C-CEO)
József Molnár	Group Chief Executive Officer (GCEO)
JUDr. Oszkár Világi	Group Chief Innovation Officer; C-CEO, Slovnaft, a.s.

Members of the MC:

József Molnár	Group Chief Executive Officer (GCEO)
Lana Faust Križan	Group HR Senior Vice President
Zsuzsanna Ortutay	President of INA d.d. Management Board
Zsombor Marton	Group Exploration & Production Executive Vice President
Péter Ratatics	Group Consumer Services Executive Vice President
Marek Senkovič	CEO of Slovnaft
József Simola	Group Chief Financial Officer (GCFO)
Gabriel Szabó	Group Downstream Executive Vice President
Dr. György Bacsa	Group Strategic Operations and Corporate Development Executive Vice President,
Péter Labancz	Group Industrial & Corporate Services Senior Vice President

7. GOVERNANCE AROUND CLIMATE RELATED RISKS AND CHALLENGES

7.1. BOARD OVERSIGHT OF CLIMATE RELATED ISSUES RISKS AND CHALLENGES

The Board of Directors is responsible for defining the main business objectives of the Group as well as to review and approve the Group's business strategy, including the premises and assumptions upon which the strategy was created. MOL Group's long-term transformational strategy was created based on climate related risks and challenges, which means that the Board of Directors (and its committees) consider a wide range of Climate-related risks and challenges as an integral part of its roles and responsibilities, both when it reviews and approves strategy, also when it reviews risk management policies, and business plans as well as setting the organization's performance objectives. Furthermore, the Board and its committees are tasked with monitoring and overseeing progress against goals and targets, including climate related ones. The Board of Directors is informed and continually updated on climate related risks and challenges via regular reporting through various channels. This includes quarterly and yearly reports from senior management on a broad number of issues affected by climate change, including macro trends, legislation, environment, capital markets etc. The Board of Directors took part in the revision of compliance of MOL Group Shape Tomorrow Strategy (updated in 2024) in line with the overarching EU regulations. For more information on the strategy update of MOL Group and the role of climate change and sustainability, refer to section 5 of the Integrated Annual Report.

In addition, to the BoD, two committees have been assigned climate-related responsibilities: the Sustainable Development Committee (SDC), and the Finance and Risk Management Committee (FRC). Both committees directly deal with specific climate change related matters. To ensure integrated management of sustainability related issues across the Group, including but not limited to climate change, the SDC monitors and oversees progress against sustainability related goals and targets. At least four times a year, the Group Vice President of Health, Safety & Environment reports to the SDC on progress against sustainability related goals and on climate-related issues, while the Investor Relations & ESG coordination Manager informs this Committee on various emerging sustainability-related issues and trends. Furthermore, impact of climate change related risk and opportunities at Group, divisional, country and site level are reported to the Committee each quarter through a number of deep-dive presentations. The FRC on the other hand is tasked with monitoring, among other things, the financial and operational risks as well as the methodology and management of risks, furthermore the operation of Enterprise Risk Management (ERM) system. Both long-term strategic risk assessments and mid-term risk reports (covering also Climate Change Risk) are submitted to the FRC. Climate change is a strategic risk for MOL Group and is part of the Group's ERM system, and is reported and presented to members of the FRC accordingly. More information can be obtained from section 7.2.

7.2. MANAGEMENT'S ROLE IN ASSESSING AND MANAGING CLIMATE RISKS AND CHALLENGES

Part of the role and responsibilities of the executive management include assessing and managing climate-related risks and challenges, as well as executing the approved strategy. In terms of organizational structure, responsibility for climate change does not reside in a single department or person. Responsibilities for climate change related matters are dispersed through a wide number of roles across the Group. Several functions at Group level analyze climate change related risks and challenges. These include but are not limited to the Group Strategy & Sustainability (climate change implications on strategy), Chief Economist (sustainability and climate change macro trends), Public and EU Regulatory Affairs (global and regional climate change related legislation), HSE department (analysis and mitigation of environmental risks, tracking environmental performance), and Investor Relations & ESG Coordination (ESG developments in capital markets). Furthermore, all divisions monitor and assess climate-related risks and challenges as an integral part of their roles and responsibilities in executing and designing their strategies as well as in the ERM risk reviews. Executive management is informed and regularly updated on climate related risks and challenges via regular reporting through various channels, from both the before mentioned HQ based Group level functions as well as divisional management.

8. REMUNERATION POLICIES AND PRACTICES

The Board of Directors – with the aim of quality improvement – formally evaluates its own and its committees' performance from operation efficiency perspective on a yearly basis, furthermore, continuously reviews its own activity. The result of the evaluation is discussed by the Board of Directors.

The Supervisory Board annually evaluates its performance simultaneously with the approval of the work plan for next year.

8.1. PERFORMANCE EVALUATION OF THE CHIEF EXECUTIVES' COMMITTEE (CEC) AND THE MANAGEMENT COMMITTEE (MC)

The aim of MOL's remuneration system is to provide incentives for the top management to carry out the company's strategy and reward them for the achievement of strategic goals through a combination of short-term and long-term incentives. Remuneration plays an important role in supporting the achievement of the individual, divisional and corporate goals. Through the design of its incentive schemes, MOL aims to ensure that executive remuneration is in compliance with and supports the strategic goals of the company thus ensuring the alignment of the interests of the executives with those of our shareholders.

The remuneration of CEC and MC consists of three key pillars:

- Annual Base Salary (BS): fixed annual amount paid to the individuals
- Short-Term Incentive (STI): annual incentive, based on individual and company performance
- Long-Term Incentive (LTI): an incentive that promotes performance driven culture enhances the focus on strategy which is in compliance with the interests of shareholders

The incentive scheme of the top management comprised the following elements in 2024:

8.1.1. SHORT TERM INCENTIVE SYSTEM (STI)

Short term Incentive is calculated as % of the annual base salary which is defined in line with the complexity level of the position and it is further depending on Corporate, Divisional (valid for MC members), ESG and Individual performance for the relevant year. Final calculation is the multiplication of all defined factors and the amount of the Short term Incentive is based on the evaluation of both company's performance, as well as the performance of the given manager.

Based on the decision making system of MOL Group the annual performance of CEC is evaluated by the Corporate Governance and Remuneration Committee (CGRC) with the final approval of the members of Board of Directors. The performance of MC is evaluated by the CEC and CGRC.

Performance criteria of the annual short-term incentive
The short-term incentive framework was designed to include key focus areas in a mix of financial and non-financial KPIs in order to achieve the targets of MOL Group and MOL Plc. The choice of the performance measures reflects a desire from the Corporate Governance and Remuneration Committee to assess the participants based on a broad range of corporate and divisional measures that mirrors the corporate strategy and its related KPIs.

Financial KPIs:
Executive employees' focus is to deliver the MOL Group level EBITDA (which is also the MOL Group corporate target) and other relevant financial indicators defined annually by Group Financial Planning & Reporting. Other relevant financial targets may contain efficiency, investment and cost-related indicators. In 2024, the key focus of the Chief Executives' Committee members was to deliver the EBITDA and free cash-flow targets to achieve the strategic targets of MOL Group.

Non-financial KPIs:
Safety is a number one Group priority, which is why the Corporate Governance and Remuneration Committee consistently defines divisional SD&HSE (Sustainable Development and Health, Safety and Environment) related performance indicators. Hence in 2024, MOL Group set the fulfillment of Total Recordable Injury Rate (TRIR) as this shows the commitment for conducting safe, sustainable and compliant operations at all times.

For CEC members, the following individual targets were set for 2024:

- Continue the implementation of MOL Group 2030+ Strategy with priority goals for 2024 in the light of supply security challenges, drive 2050 strategic vision focusing on climate change effect
- Drive further enhancement of the operational model and further support efficiency improvements, reflecting changed market conditions triggered by Russian-Ukrainian war effects
- Efficient execution of supervisory activities by encouraging constant revision and simplification of governance structure and processes
- Focus on and support further increasing employee engagement based on the action plans built on the 2021 employee survey, to ensure making MOL Group the best choice of employees along with collaborative culture and employee experience, diversity and inclusion and driving talent management throughout the organisation
- Promote life-saving rules across MOL Group
- Further enhance sustainability aspects of MOL Group operations, further improves business efficiency and increase productivity in the respective areas

For MC members the individual targets set were aligned with the 2024 business plan and priorities for the given Divison / organizational area with high focus on the following topics:

- Delivery of set business plans and planned projects,
- Transformation of operating models (where applicable) and increase of the operating efficiency with focus on implementation of the cost optimizing projects, to realize respective division's business strategy (e.g.: strategic portfolio management, ESG projects, decarbonization projects, digitalization projects, etc.),
- People and leadership targets (e.g. developing leadership culture, increase of employee engagement in respective domains, efficient performance and talent management, etc.).

The applied performance indicators reflect the intention of the Corporate Governance and Remuneration Committee to assess the participants based on a broad range of corporate and divisional measures.

Measurement & validation of the performance metrics

Chief Executive Committee members' annual performance is evaluated by the Board of Directors with the prior approval of the Corporate Governance and Remuneration Committee. The performance of MC members is evaluated by Chief Executive Committee with the prior approval of the Corporate Governance and Remuneration Committee. Target achievement of financial KPI's is based on the evaluation proposal of the Financial Planning & Reporting organization and is also approved by the relevant Governance bodies.
Executive employees have no deferral period or any claw back provision regarding their short-term incentive.

8.1.2. SHORT TERM SHARE OWNERSHIP PROGRAM

CEC, MC members and top management can choose a share ownership scheme instead of their short-term incentive in each year, which is operated via a legal entity independent from MOL Plc., called MOL Plc. Employee Share Ownership Program Organization in compliance with the provisions of the so-called Employee Share Ownership Program (Munkavállalói Résztulajdonosi Program, 'MRP') legislation.

The primary aim of this voluntary short-term share ownership program is to incentivize the top management to achieve the strategic targets of MOL Group in line with the shareholders' interests.

Program characteristics:

- Joining the program is voluntary
- The basis of the entitlement is a certain number of shares equal to the short-term incentive entitlement converted to shares with the December average MOL Plc. share price before the target year
- Final payout is based on the overall performance evaluation, consisting of the Corporate, Divisional, ESG and Individual payout rates
- Condition for the payment in shares from MRP Organization is that the MOL Plc. share price shall be higher at the end of the performance period than it was at the beginning of the performance period
- The payment is due in MOL Plc. shares from MRP Organization if share price condition is met. If the share price condition is not met and the average share price at the end of the performance period is lower than share price at its beginning, the payout of the incentive is due in cash with normal taxation rules and in the currency defined in the agreement with the Executive Employee employed by MOL Plc.

8.1.3. LONG TERM INCENTIVE

The purpose of the long-term incentive system is to enhance individual performance to enable future growth of MOL Plc. and MOL Group financial performance and improvement of efficiency by taking into account shareholder interests.

The long-term incentive framework was reviewed in the last quarter of 2020. Starting from 1 January 2021, Restricted Share Plan is applied instead of the previously applicable Long term Incentive schemes which remained valid only from the aspect of payout of the gained entitlements for period until end of 2020.

The new long-term incentive was introduced to create even stronger link to the strategic targets of MOL Group, shareholders' interests and long-term incentivization and retention of top management. The long-term incentives are managed and paid out in accordance with personal scope and other conditions either through MRP program or in line with the provisions set in internal policies.

8.1.3.1. RESTRICTED SHARE PLAN

The program is a 3-year share-based incentive based on MOL corporate and individual performance with the following characteristics:

- A new program starts in each year on a rolling scheme with a 3-year performance period. Payments are due in 4th year
- Corporate performance – MOL Group EBITDA performance – is evaluated after the 3-year performance period
- Individual performance is evaluated after the 3-year performance period
- Final payout is corrected with dividend equivalent after year1 and year2 to represent a real shareholder position
- The above methodology ensures that both corporate and individual performance is reflected in the final incentive amount
- Condition for the payment in shares from MRP Organization is that the MOL Plc. share price shall be higher at the end of the performance period than it was at the beginning

- The payment is made in MOL Plc. shares if share price condition is met If not met, the payout of the incentive is due in cash in the currency requested by the Executive Employee employed by MOL Plc.

Overview:

Restricted Share Plan	Volume-weighted average of daily MOL share price of December 2020	Volume-weighted average of daily MOL share price of December 2023	Payout
2021	2 109 HUF	2 817 HUF	From MRP in shares in January 2024

Performance measures of the long-term incentive plans

Long-term incentive plan is linked to share price and dividend payment reflecting the Board's strategic priority on reaching continuous and sustainable value creation. Through its long-term incentives schemes, MOL prioritizes providing its shareholders with a return on their investment through both the appreciation of the share price as well as through the payment of dividends.

CORPORATE AND SHAREHOLDER INFORMATION

CORPORATE INFORMATION

Date of foundation of MOL Plc.: October 1, 1991. Registered by the Budapest Court of Justice acting as Court of Registration on 10 June 1992 with effect as of 1 October 1991, under file number 01-10-041683.

Legal predecessor: Országos Kőolaj- és Gázipari Tröszt (OKGT National Oil and Gas Trust) and its subsidiaries.

The effective Articles of Association can be downloaded from Company's website.

Registered share capital as of 31 December 2024: 819,424,824 registered series "A" ordinary shares with a par value of HUF 125 each, 1 registered series "B" preferred share with a par value of HUF 1,000 with special preferential rights attached and 578 registered series "C" ordinary shares with a par value of HUF 1,001 each.

OWNERSHIP STRUCTURE

	31.12.2024		31.12.2023	
	Par value of shares (HUF th)	**%**	**Par value of shares (HUF th)**	**%**
Foreign investors	29,817,181	29.11	31,570,811	30.82
Hungarian State	1	0.00	1	0.00
MOL New Europe Foundation	10,744,499	10.49	10,744,499	10.49
Maecenas Corvini Fundation	10,242,868	10.00	10,242,868	10.00
Mathias Corvinus Collegium Fundation	10,242,868	10.00	10,242,868	10.00
MOL Plc. SESOP Organization	8,142,472	7.95	8,142,472	7.95
OTP Bank Plc.	5,014,314	4.90	5,011,002	4.89
OTP Fund Management	406,268	0.40	313,593	0.31
ING Bank N.V.	3,875,000	3.78	3,865,884	3.77
UniCredit Bank AG	3,875,000	3.78	3,842,796	3.75
Commerzbank AG	834,502	0.81	0	0.00
Domestic institutional investors	9,722,956	9.49	9,071,133	8.86
Domestic private investors	6,956,835	6.79	5,653,495	5.52
MOL Plc (treasury shares)	2,553,918	2.49	3,727,262	3.64
Total	**102,428,683**	**100.00**	**102,428,683**	**100.00**

Please note, that data above do not fully reflect the ownership structure in the Share Registrar. It is based on the received request for registration of the shares and the published shareholder notifications. The registration is not mandatory. The shareholder may exercise its rights towards the company, if the shareholder is registered in the Share Registrar. According to the Articles of Association, no shareholder or shareholder group may exercise more than 10% of the voting rights.

SHARE INFORMATION

MOL share prices are published by the majority of Hungarian daily newspapers and are available on the BSE web site (www.bse.hu). Indicative bid and ask prices of MOL's DRs on IOB can be monitored using the RIC code MOLBq.L on Thomson Reuters or MOLD LI on Bloomberg. MOL shares and DRs are traded on one of the US OTC market, Pink Sheet.

MOL share prices on the Budapest Stock Exchange can be followed on Thomson Reuters using the RIC code MOLB.BU or on Bloomberg using code MOL HB.

The following table shows trading data on MOL shares each quarter of 2024.

Period	BSE volume (no. of shares)	BSE closing price (HUF/share)
1st quarter	27,789,410	2,960
2nd quarter	33,721,275	2,878
3rd quarter	33,694,938	2,668
4th quarter	30,768,271	2,730

TREASURY SHARES

During 2024 the following treasury share transactions happened:

Reasons for change	Number of "A" series Ordinary shares
Number of Treasury shares on 31 December 2023	29,813,466
MOL transferred Treasury shares to MOL Plc ESOP Organization (3 times)	(2,164,173)
MOL acquired MOL shares from ING Bank N.V. as a result of exercising option its rights	30.927.069
MOL acquired MOL shares from Unicredit Bank AG as a result of exercising its option rights	30.742.366
MOL concluded new share sale and derivative agreements with Unicredit Bank AG. and sold MOL shares to Unicredit Bank AG. under the sale agreement	(31,000,000)
MOL concluded new share sale and derivative agreements with ING Bank N.V. and sold MOL shares to ING Bank N.V. under the sale agreement	(31,000,000)
MOL concluded new share sale and derivative agreements with Commerzbank AG and sold MOL shares to Commerzbank AG under the sale agreement	(6,676,013)
Share distribution for the members of the Board of Directors and the management	(216,000)
Number of Treasury shares on 31 December 2024	20,426,715

In 2024 the number of “C” series shares owned by MOL remained unchanged at 578 pieces.

INFORMATION ON THE SERIES “B” SHARE

Series “B” share is a voting preference share with a par value of HUF 1,000 that entitles the holder thereof to preferential rights as specified in the Articles of Association. The series "B" share is owned by MNV Zrt., exercising ownership rights on behalf of the Hungarian State. The series “B” share entitles its holder to one vote in accordance with its nominal value. The supporting vote of the holder of series “B” share is required to adopt decisions in the following matters pursuant to Article 12.4. of the Articles of Association: decision on amending the articles regarding the series “B” share, the definition of voting rights and shareholder group, list of issues requiring supermajority at the general meeting as well as Article 12.4. itself; further, the “yes” vote of the holder of series “B” share is required to adopt decisions on any proposal not supported by the Board of Directors in the following matters: election and dismissal of the members of the Board of Directors, the Supervisory Board and the auditors, decision of distribution of profit after taxation and amending of certain provisions of the Articles of Association.

THE APPOINTMENT AND REMOVAL OF SENIOR OFFICERS; AMENDMENT OF THE ARTICLES OF ASSOCIATION

The general meeting elects members of the Board of Directors for a pre-defined term, the maximum of which is five (5) years. The General Meeting decides on Board Members by simple majority vote, but it shall decide the dismissal of any member of the Board of Directors by three-quarter majority of votes. The “yes” vote of the holder of “B” series of share is required for the election and dismissal of any member of the Board of Directors at the general meeting if not supported by the Board of Directors.

The appointment of a member of the Board of Directors, as provided for by the Articles of Association, can be terminated at any time or may be renewed after the expiry of the five-year term. In the event any shareholder initiates the termination of appointment of one or more members of the Board of Directors, the general meeting may only decide on dismissal of maximum one member of the Board of Directors validly, with the restrictions that during the three months period following the decision on dismissal of the one member of the Board of Directors, no further dismissal of a member of the Board of Directors may take place.

The General Meeting decides on the modification of Articles of Association by two-third majority of votes. The “yes” vote of the holder of “B” series of share is required for the amendment of certain provisions of the articles of association.

RIGHTS OF SENIOR OFFICERS RELATED TO SHARE ISSUANCE AND BUYBACK

Based on the authorization granted in the Articles of Association, the Board of Directors is entitled to increase the share capital until 24 April 2029 in one or more instalments, by not more than HUF 30,000,000,000 (i.e. Thirty billion forints), in any form and method provided by the Civil Code and resolve the amendment of the Articles of Association in connection thereof. The Annual General Meeting held on 25 April 2024 granted authorization valid for 18 months to the Board of Directors of the Company to acquire treasury shares.

CHANGES IN ORGANIZATION AND SENIOR MANAGEMENT

The 2024 Annual General Meeting made the following resolutions:

- elected Dr. Sándor Csányi as member of the Board of Directors from 30 April 2024 to 29 April 2029.
- elected Dr. Anthony Radev as member of the Board of Directors from 30 April 2024 to 29 April 2029.

- elected Mr. Talal Al Awfi as member of the Board of Directors from 30 April 2024 to 29 April 2029.
- elected Dr. Anett Pandurics as member of the Supervisory Board from 30 April 2024 to 29 April 2029.
- elected Dr. Anett Pandurics as member of the Audit Committee from 30 April 2024 to 29 April 2029.

MOL SECURITIES HELD BY DIRECTORS AND OFFICERS OF THE COMPANY AS OF 31 DECEMBER 2024:

Name	Current position	Number of MOL shares
Zsolt Hernádi*	Chairman of the Board of Directors,Chairman-CEO (C-CEO)	540,822
Dr. Sándor Csányi**	member of the Board of Directors, Vice-Chairman	24,000
József Molnár	member of the Board of Directors, Group Chief Executive Officer (GCEO)	385,191
Dr. Bacsa György	member of the Board of Directors, Executive Vice President, Group Strategic Operations and Business Development, MOL Hungary COO	96,821
Talal Al-Awfi	member of the Board of Directors	44,105
Zsigmond Járai	member of the Board of Directors	145,920
Dr. László Parragh	member of the Board of Directors	64,760
Dr. Anthony Radev	member of the Board of Directors	140,872
Dr. Martin Roman	member of the Board of Directors	48,000
JUDr. Oszkár Világi	member of the Board of Directors, Executive Vice President, Innovative Businesses and Services; Chairman of the Board of Directors and CEO of Slovnaft a.s.	308,528
Zoltán Áldott	Chairman of the Supervisory Board	250,000
Dr. Anett Pandurics	Deputy Chairman of the Supervisory Board	0
Mr. Péter Bíró	member of the Supervisory Board	0
Dr. Lajos Dorkota	member of the Supervisory Board	0
Péter Kaderják	member of the Supervisory Board	0
Ivan Mikloš	member of the Supervisory Board	0
Prof. Dr. András Lánczi	member of the Supervisory Board	0
Norbert Izer	member of the Supervisory Board	0
Bálint Kis	member of the Supervisory Board, representative of the employees	0
Dr. Sándor Puskás	member of the Supervisory Board, representative of the employees	0
Kálmán Serfőző	member of the Supervisory Board, representative of the employees	0
András Tóth	member of the Supervisory Board, representative of the employees	0
Lana Faust Krizan	HR Senior Vice President	0
Marek Senkovic	CEO & Head of Downstream of SLOVNAFT	0
Marton Zsombor	Executive Vice President, Upstream	8,903
Péter Ratatics	Executive Vice President, Consumer Services	40,000
József Simola	Group Chief Financial Officer (GCFO)	30,000
Gabriel Szabó	Executive Vice President, Downstream	34,183
Zsuzsanna Ortutay	President of the Management Board, INA d.d.	0

* Mr. Zsolt Hernádi owns 540,822 shares directly, 1,463,545 shares indirectly via Continuum Vagyonkezelő Alapítvány.
** Dr. Sándor Csányi indirectly owns 2,648,833 shares Unity Vagyonkezelő Alapítvány.

FURTHER INFORMATION ON CORPORATE GOVERNANCE

MOL Group publishes on its website each year the MOL Plc. Corporate Governance Report in accordance with Budapest Stock Exchange Corporate Governance Recommendations, which also discloses any potential divergence from these recommendations with the necessary reasoning.

CONTACT INFORMATION

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Phone: (+36-1) 483-6251, (+36-1) 483-6289

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Fax: (+36-1) 429-6899

E-mail: info@bse.hu

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MOL HUNGARIAN OIL AND GAS PLC.

CONSOLIDATED FINANCIAL STATEMENTS PREPARED IN ACCORDANCE WITH INTERNATIONAL FINANCIAL REPORTING STANDARDS AS ADOPTED BY THE EUROPEAN UNION (EU) TOGETHER WITH THE INDEPENDENT AUDITOR'S REPORT

31 December 2024

Budapest, 18 March 2025

CONSOLIDATED FINANCIAL STATEMENTS

Introduction

General information

MOL Hungarian Oil and Gas Public Limited Company (hereinafter referred to as MOL Plc., MOL or the parent company) was incorporated on 1 October 1991 in Hungary by the transformation of the predecessor National Oil and Gas Trust (OKGT). MOL Plc. and its subsidiaries (hereinafter referred to as the MOL Group or Group) is an integrated, international oil and gas, petrochemicals and consumer retail company, active in over 30 countries with a dynamic international workforce of 25,000 people and a track record of more than 100 years in the industry with its legal predecessor. MOL Group has over 80 years of experience in exploration and production and its diverse portfolio includes active oil and gas presence in 9 countries, with production activity in 8 countries. MOL Group's Downstream division operates three refineries and two petrochemicals plants in Hungary, Slovakia and Croatia, and is made up of different business activities that are part of an integrated value chain and MOL Group's retail network is composed of around 2,400 service stations in 10 countries.

The registered office address of the Company is 1117 – Budapest, Dombóvári út 28, Hungary.

The shares of the Company are listed on the Budapest and the Warsaw Stock Exchange. Depositary Receipts (DRs) are traded Over The Counter (OTC) market in the USA. There is no single ultimate controlling party of MOL Group.

Authorisation and Statement of Compliance

These consolidated financial statements have been approved and authorised for issue by the Board of Directors on 18 March 2025.

These consolidated financial statements have been prepared in accordance with International Financial Reporting Standards and all applicable IFRSs that have been adopted by the European Union (EU). IFRS comprise standards and interpretations approved by the International Accounting Standards Board (IASB) and the IFRS Interpretations Committee.

The Mol Group complies with the requirements of European Securities and Markets Authority (ESMA) and publishes its annual financial report in XHTML format from 1 January 2021 and provide the consolidated financial statements prepared in accordance with IFRS as adopted by the European Union (EU) with Inline XBRL to make the consolidated data machine-readable.

Contents

INDEPENDENT AUDITOR'S REPORT

The Mol Group complies with the requirements of European Securities and Markets Authority (ESMA) and publishes its annual financial report in XHTML format **from 1 January 2021** and provide the consolidated financial statements prepared in accordance with IFRS as adopted by the European Union (EU) with Inline XBRL to make the consolidated data machine-readable. The independent auditor's report is a separate document.

CONSOLIDATED STATEMENT OF PROFIT OR LOSS

	Notes	2024 HUF million	2023 HUF million
Net sales		9,178,677	8,908,499
Other operating income		69,837	57,537
Total operating income	3	**9,248,514**	**8,966,036**
Raw materials and consumables used		7,360,586	6,761,197
Employee benefits expense		444,386	384,356
Depreciation, depletion, amortisation and impairment		506,442	471,684
Other operating expenses		627,988	672,547
Change in inventory of finished goods and work in progress		(118,501)	101,601
Work performed by the enterprise and capitalised		(157,259)	(102,924)
Total operating expenses	4	**8,663,642**	**8,288,461**
Profit from operation		**584,872**	**677,575**
Finance income		88,800	195,177
Finance expense		155,716	182,651
Total finance expense, net	5	**(66,916)**	**12,526**
Share of after-tax results of associates and joint ventures	6	24,347	1,317
Profit/(Loss) before tax		**542,303**	**691,418**
Income tax expense	7	145,600	123,514
Profit/(Loss) for the year from continuing operations		**396,703**	**567,904**
Profit / (Loss) for the period from discontinued operations	**19**	**(40,893)**	**(449)**
PROFIT / (LOSS) FOR THE PERIOD		**355,810**	**567,455**
Attributable to:			
Owners of parent from continuing operations		368,158	530,367
Non-controlling interest from continuing operations		28,545	37,537
Owners of parent from discontinued operations		(40,893)	(449)
Non-controlling interest from discontinued operations		-	-
Owners of parent		327,265	529,918
Non-controlling interest		28,545	37,537
Basic earnings per share attributable to owners of the parent (HUF) cont.op.	27	496.19	715.42
Diluted earnings per share attributable to owners of the parent (HUF) cont.op.		496.19	715.42
Basic earnings per share attributable to owners of the parent (HUF) discont.op.		(55.11)	(0.61)
Diluted earnings per share attributable to owners of the parent (HUF) discont.op.		(55.11)	(0.61)
Basic earnings per share attributable to owners of the parent (HUF)		441.08	714.81
Diluted earnings per share attributable to owners of the parent (HUF)	27	441.08	714.81

CONSOLIDATED STATEMENT OF OTHER COMPREHENSIVE INCOME

	Notes	2024 HUF million	2023 HUF million
Profit/(Loss) for the year from continuing operations		**396,703**	**567,904**
Profit/(Loss) for the year from discontinued operations		**(40,893)**	**(449)**
Profit/(Loss) for the year		**355,810**	**567,455**
Other comprehensive income			
Other comprehensive income to be reclassified to profit or loss in subsequent periods:			
Exchange differences on translating foreign operations, net of tax	8	250,958	(145,942)
Exchange differences on translating discontinued operations, net of tax		-	-
Net investment hedge, net of tax	8	(19,557)	18,626
Changes in fair value of debt instruments at fair value through other comprehensive income, net of tax	8	(530)	4,118
Changes in fair value of cash flow hedges, net of tax	8	(681)	(787)
Share of other comprehensive income of associates and joint ventures	8	13,200	(13,125)
Other comprehensive income from continuing operation / (loss) for the year, net of tax		**243,390**	**(137,110)**
Net other comprehensive income to be reclassified to profit or loss in subsequent periods		**243,390**	**(137,110)**
Other comprehensive income not to be reclassified to profit or loss in subsequent periods:			
Changes in fair value of equity instruments at fair value through other comprehensive income, net of tax	8	12,028	17,340
Remeasurement of post-employment benefit obligations	8	97	(2,470)
Net other comprehensive income not to be reclassified to profit or loss in subsequent periods		**12,125**	**14,870**
Other comprehensive income from continuing operation / (loss) for the year, net of tax		**255,515**	**(122,240)**
Other comprehensive income for the period, net of tax		**255,515**	**(122,240)**
Total comprehensive income from continuing operation for the period		**652,218**	**445,664**
Total comprehensive income from discontinued operation for the period		**(40,893)**	**(449)**
Total comprehensive income for the period		**611,325**	**445,215**
Attributable to:			
Owners of parent from continuing operation		596,131	426,536
Non-controlling interest from continuing operation		56,087	19,128
Owners of parent from discontinued operation		(40,893)	(449)
Non-controlling interest from discontinued operation		-	-
Owners of parent		555,238	426,087
Non-controlling interest		56,087	19,128

CONSOLIDATED STATEMENT OF FINANCIAL POSITION

	Notes	31 Dec 2024 HUF million	31 Dec 2023 HUF million
NON-CURRENT ASSETS			
Property, plant and equipment	9	4,632,771	3,997,801
Investment property	9	18,612	15,959
Intangible assets	9	517,440	525,569
Investments in associates and joint ventures	6	244,754	204,187
Other non-current financial assets	21	289,653	312,084
Deferred tax assets	7	135,262	135,123
Other non-current assets	14	74,943	71,995
Total non-current assets		**5,913,435**	**5,262,718**
CURRENT ASSETS			
Inventories	11	880,527	830,573
Trade and other receivables	23	953,910	959,082
Securities	21	6,711	3,763
Other current financial assets	21	71,263	64,643
Income tax receivable		72,157	25,197
Cash and cash equivalents	24	433,610	412,977
Other current assets	15	140,864	134,400
Assets classified as held for sale	19	1,524	9,772
Total current assets		**2,560,566**	**2,440,407**
Total assets		**8,474,001**	**7,703,125**
EQUITY	20		
Share capital		79,443	79,192
Retained earnings and other reserves		3,836,873	3,227,876
(Loss) / Profit for the year attr. to owners of parent		327,265	529,918
Equity attributable to owners of parent		**4,243,581**	**3,836,986**
Non-controlling interest		**415,527**	**360,326**
Total equity		**4,659,108**	**4,197,312**
NON-CURRENT LIABILITIES			
Long-term debt	21	962,758	913,181
Other non-current financial liabilities	21	7,175	5,142
Non-current provisions	16	707,255	557,215
Deferred tax liabilities	7	177,556	147,067
Other non-current liabilities	17	46,571	40,290
Total non-current liabilities		**1,901,315**	**1,662,895**
CURRENT LIABILITIES			
Short-term debt	21	290,246	185,401
Trade and other payables	21	901,377	961,965
Other current financial liabilities	21	239,574	204,916
Current provisions	16	117,599	114,748
Income tax payable		35,210	60,832
Liabilities classified as held for sale	19	-	-
Other current liabilities	18	329,572	315,056
Total current liabilities		**1,913,578**	**1,842,918**
Total liabilities		**3,814,893**	**3,505,813**
Total equity and liabilities		**8,474,001**	**7,703,125**

CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

	Notes	Share capital	Share premium	Fair valuation reserve	Reserve of exchange differences on translation	Retained earnings with profit for the year attr. to owners of parent	Total reserves	Equity attr. to owners of parent	Non-controlling interests	Total equity
		HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
Opening balance 1 Jan 2023		**79,013**	**219,389**	**17,477**	**658,491**	**2,658,996**	**3,554,353**	**3,633,366**	**378,770**	**4,012,136**
Profit / (loss) for the year from continuing operation		-	-	-	-	530,367	**530,367**	**530,367**	37,537	**567,904**
Profit / (loss) for the year from discontinued operation		-	-	-	-	(449)	**(449)**	**(449)**	-	**(449)**
Other comprehensive income / (loss) for the year from continuing operation		-	-	18,170	(119,371)	(2,630)	**(103,831)**	**(103,831)**	(18,409)	**(122,240)**
Other comprehensive income / (loss) for the year from discontinued operation		-	-	-	-	-	-	-	-	-
Total comprehensive income / (loss) for the year		-	-	18,170	(119,371)	527,288	**426,087**	**426,087**	19,128	**445,215**
Dividends	20	-	-	-	-	(224,435)	**(224,435)**	**(224,435)**	-	**(224,435)**
Dividends to non-controlling interests	20	-	-	-	-	-	-	-	(38,387)	**(38,387)**
Equity recorded for share-based payments	4	179	-	-	-	3,652	**3,652**	**3,831**	-	**3,831**
Treasury share transactions	20	-	-	-	-	-	-	-	-	-
Acquisition / divestment of subsidiaries		-	-	-	-	(1,863)	**(1,863)**	**(1,863)**	815	**(1,048)**
Acquisition of non-controlling interests		-	-	-	-	-	-	-	-	-
Other		-	-	-	-	-	-	-	-	-
Closing balance 31 Dec 2023		**79,192**	**219,389**	**35,647**	**539,120**	**2,963,638**	**3,757,794**	**3,836,986**	**360,326**	**4,197,312**
Opening balance 1 Jan 2024		**79,192**	**219,389**	**35,647**	**539,120**	**2,963,638**	**3,757,794**	**3,836,986**	**360,326**	**4,197,312**
Profit / (loss) for the year from continuing operation		-	-	-	-	368,158	**368,158**	**368,158**	28,545	**396,703**
Profit / (loss) for the year from discontinued operation		-	-	-	-	(40,893)	**(40,893)**	**(40,893)**	-	**(40,893)**
Other comprehensive income / (loss) for the year from continuing operation		-	-	9,738	218,279	(44)	**227,973**	**227,973**	27,542	**255,515**
Other comprehensive income / (loss) for the year from discontinued operation		-	-	-	-	-	-	-	-	-
Total comprehensive income / (loss) for the year		-	-	**9,738**	**218,279**	**327,221**	**555,238**	**555,238**	56,087	**611,325**
Dividends	20	-	-	-	-	(158,874)	**(158,874)**	**(158,874)**	-	**(158,874)**
Dividends to non-controlling interests	20	-	-	-	-	-	-	-	(48,770)	**(48,770)**
Equity recorded for share-based payments	4	251	-	-	-	2,971	**2,971**	**3,222**	-	**3,222**
Treasury share transactions	20	-	-	-	-	7	**7**	**7**	-	**7**
Acquisition / divestment of subsidiaries		-	-	-	-	-	-	-	47,884	**47,884**
Acquisition of non-controlling interests		-	-	-	-	7,002	**7,002**	**7,002**	-	**7,002**
Other		-	-	-	-	-	-	-	-	-
Closing balance 31 Dec 2024		**79,443**	**219,389**	**45,385**	**757,399**	**3,141,965**	**4,164,138**	**4,243,581**	**415,527**	**4,659,108**

CONSOLIDATED STATEMENT OF CASH FLOWS

	Notes	2024 HUF million	2023 HUF million
Profit/(Loss) before tax from continuing operation		**542,303**	**691,418**
Profit/(Loss) before tax from discontinued operation		**(40,893)**	**(449)**
Profit/(Loss) before tax		**501,410**	**690,969**
Adjustments to reconcile profit before tax to net cash provided by operating activities			
Depreciation, depletion, amortisation and impairment	4	506,442	471,684
Increase/(decrease) in provisions	16	(1,846)	(22,331)
Net (gain)/loss on asset disposal and divestments		(28,674)	(9,135)
Net interest expense/(income)	5	34,440	(2,233)
Other finance expense/(income)	5	34,063	(12,315)
Share of after-tax results of associates and joint ventures	6	(24,347)	(1,317)
Other items	26	88,740	7,516
Income taxes paid	7	(195,639)	(455,505)
Cash flows from operations before changes in working capital		**914,589**	**667,333**
Change in working capital		*(94,089)*	*86,683*
(Increase)/decrease in inventories	11	(32,170)	160,853
(Increase)/decrease in trade and other receivables	23	34,862	(62,968)
Increase/(decrease) in trade and other payables	21	(158,688)	64,449
(Increase)/decrease in other assets and liabilities	15, 18	61,907	(75,651)
Cash flows from operations		**820,500**	**754,016**
Capital expenditures	2	(599,017)	(503,118)
Proceeds from disposal of fixed assets		42,600	35,975
Acquisition of businesses (net of cash)	10	(2,184)	(124,817)
Proceeds from disposal of businesses (net of cash)	13, 19	268	46,228
(Increase)/Decrease in other financial assets	21	(4,461)	19,230
Interest received and other finance income	5	27,232	36,347
Dividends received	5	23,136	6,212
Cash flows used in investing activities		**(512,426)**	**(483,943)**
Proceeds from issue of bonds, notes and debentures		-	-
Repayments of bonds, notes and debentures		-	(279,735)
Proceeds from borrowings		2,004,706	1,020,713
Repayments of borrowings		(2,061,963)	(805,764)
Interest paid and other finance expense	5	(29,915)	(61,371)
Dividends paid to owners of parent	20	(194,982)	(229,485)
Dividends paid to non-controlling interest	20	(48,173)	(38,894)
Transactions with non-controlling interest		18	-
Net issue / repurchase of treasury shares		-	-
Other changes in equity		-	-
Cash flows used in financing activities		**(330,309)**	**(394,536)**
Currency translation differences relating to cash and cash equivalents		40,051	(66,256)
Increase/(decrease) in cash and cash equivalents		**17,816**	**(190,719)**
Cash and cash equivalents at the beginning of the year		412,977	595,244
Cash and cash equivalents at the end of the year		433,610	412,977
Change in Cash and cash equivalents		**20,633**	**(182,267)**
Change in cash and cash equivalents classified as asset held for sale		-	-
Change in Overdraft		(2,817)	(8,452)
Increase/(decrease) in cash and cash equivalents		**17,816**	**(190,719)**

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS – MATERIAL ACCOUNTING POLICIES AND OTHER EXPLANATORY INFORMATION

This section describes the basis of preparation of the consolidated financial statements and the Group's applicable accounting policies. Accounting policies, critical accounting estimates and judgements that are specific to a given area are set out in detail in the relevant notes. This section also provides a brief summary of new accounting standards, amendments and interpretations that have already been adopted in the current financial year or will be adopted as those will be in force in the forthcoming years.

5. Material accounting policies and other explanatory information

Basis of preparation

These consolidated financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board and interpretations issued by IFRS Interpretations Committee as adopted by the EU and effective on 31 December 2024.

The consolidated financial statements are prepared on a going concern basis. For the purposes of the application of the historical cost convention, the consolidated financial statements treat the Company as having come into existence as of 1 October 1991, at the carrying values of assets and liabilities determined at that date, subject to the IFRS adjustments.

Due to the technical limitations inherent to the block-tagging of the consolidated financial statements according to the European single electronic format, the content of certain tags of the notes may not be rendered identically to the accompanying consolidated financial statements.

Principles of consolidation

The consolidated financial statements as ended 31 December 2024 comprise the accounts of the MOL Plc. and the subsidiaries that it controls together with the Group's attributable share of the results of associates and joint ventures. MOL Plc. and its subsidiaries are collectively referred to as the 'Group'.

Control is evidenced when the Group is exposed, or has rights, to variable returns from its involvement with a company, and has the ability to affect those returns through its power over the company. Power over an entity means having existing rights to direct its relevant activities. The relevant activities of a company are those activities which significantly affect its returns.

Where the Group has a long-term equity interest in an undertaking and over which it has the power to exercise significant influence, the Group applies the equity method.

An arrangement is under joint control when the decisions about its relevant activities require the unanimous consent of the parties sharing the control of the arrangements.

If the Company has rights to the assets and obligations for the liabilities relating to the arrangement, then the arrangement is qualified as a joint operation. The Company's interests in a joint operation are accounted for by recognising its relative share of assets, liabilities, income and expenses of the arrangement, combining with similar items in the consolidated financial statements on a line-by-line basis.

If the Company has rights to the net assets of the arrangement, then the arrangement is qualified as a joint venture. The Group's investments in joint ventures are accounted for using the equity method of accounting.

In case of participation interest in joint operating agreements which do not establish joint control, the Group analyses the parties' rights to the assets and obligations for the liabilities relating to the arrangement and the parties' rights to the corresponding revenues and obligations for the corresponding expenses. Given that the joint arrangement is not structured through a separate vehicle, the Group therefore recognises the operations proportionately, based on its share in revenue, costs, assets, and liabilities relating to the joint operation.

New and amended standards adopted by the Group

The Group has applied the following standards and amendments for the first time for the annual reporting period commencing January 2024:

- Amendments to IAS 1 "Presentation of Financial Statements" (effective January 1, 2024):
    - Classification of liabilities into current and non-current categories (issued on 23rd of January 2020);
    - Classification of liabilities into current and non-current categories – Offset effective date (issued on 15th of June 2020) and
    - Non-current liabilities with covenants (issued on 31st of October 2022);
- IFRS 16 Modification of leases: lease liability in cases sold and leased back (issued on 22nd of September 2022 and effective 1st of January 2024).

The above-mentioned amendments do not impact significantly the Group's consolidated results, financial position or disclosures.

Amendments in accounting policies

Voluntary amendments

Involving entities under common control are outside the scope of IFRS 3 and there is no other specific guidance in IFRS. MOL Group use judgement to develop an accounting policy that provides relevant and reliable information in accordance with IAS 8. Generally, MOL Group adopts the cost-based approach, but each transaction must be assessed individually and if there is a local legislation or regulation requiring a fair value approach then the cost-based approach may be overridden.

Issued but not yet effective International Financial Reporting Standards

Issued but not yet effective International Financial Reporting Standards are disclosed in the Appendix I.

Summary of material accounting policies

Functional and presentation currency

Based on the economic substance of the underlying events and circumstances the functional currency of the parent company and the presentation currency of the Group have been determined to be the Hungarian Forint (HUF).

Financial statement data is presented in millions of HUF, rounded to the nearest million HUF.

Foreign Currency Transactions

Foreign currency transactions are recorded initially at the rate of exchange at the date of the transaction, except for advanced payments for non-monetary items for which the date of transaction is the date of initial recognition of the prepayment. Exchange differences arising when monetary items are settled or when monetary items are translated at rates different from those at which they were translated when initially recognised or in previous financial statements are reported in profit or loss in the period. Monetary items, goodwill and fair value adjustments arising on the acquisition of a foreign operation denominated in foreign currencies are retranslated at exchange rate ruling at the balance sheet date.

Foreign exchange differences on monetary items with a foreign operation are recognised in other comprehensive income if settlement of these items is neither planned nor likely to occur in the foreseeable future.

Financial statements of foreign entities are translated at year-end exchange rates with respect to the statement of financial position and at the weighted average exchange rates for the year with respect to the statement of profit or loss. All resulting translation differences are included in the translation reserve in other comprehensive income.

Currency translation differences are recycled to profit or loss when disposal or partial disposal of the given foreign operation occurs.

Discontinued operation

Discontinued operations are excluded from the results of continuing operations and are presented as a single amount as profit or loss after-tax from discontinued operations in the statement of profit or loss.

Additional disclosures are provided in Note 19. All other notes to the financial statements include amounts for continuing operations, unless indicated otherwise.

Significant accounting estimates and judgements

In the process of applying the accounting policies, management has made certain judgements that have significant effect on the amounts recognised in the financial statements which are set out in detail in the respective notes.

The preparation of consolidated financial statements in conformity with IFRS requires the use of estimates and assumptions that affect the amounts reported in the financial statements and the Notes thereto. Although these estimates are based on the management's best knowledge of current events and actions, actual results may differ from those estimates. These are set out in detail in the respective notes.

Effect of climate-related matters and energy transition on the significant accounting estimates

As part of the Enterprise Risk Management framework MOL Group identified climate-related matters as a material risk. MOL Group's long-term transformational strategy was created assessing these risks and represents how MOL Group plans to mitigate the low-carbon economy transition risks. In addition, MOL Group's strategy was revised in line with the European Union's proposed Fit for 55 package and the Board and its committees are continuously monitoring progress against climate related targets. As sustainable growth becomes more and more important, MOL Group Finance Plc. as borrower and MOL as guarantor signed a EUR 560 million ESG KPI Linked multicurrency revolving credit facility agreement The sustainability targets in the Agreement are aligned with the Shape Tomorrow Strategy of MOL Group and as such the transaction underscores the Group's commitment to its long-term strategy. For more information on MOL Group's actions and plans regarding climate-related matters, please refer to the respective parts of the Integrated Annual Report of the Group.

MOL has considered the future effects of MOL's own strategic decisions and commitments on having its portfolio adhered to the energy transition targets (including emission targets), the short- and long-term effects of climate change and energy transition in preparing the consolidated financial statements. They are subject to uncertainty, and they may have significant impacts on the assets and liabilities currently reported by the Group. Based on the management's analysis on climate related matters and MOL Group's 2030+ strategy, the risks associated with climate change and energy transition will not have a material impact on the Group's going concern assessment neither in the short-term nor in the foreseeable future.

The Fit for 55 package refers to the EU legislative package that represents the EU's target of reducing net greenhouse gas emissions by at least 55% by 2030 compared to 1990 levels. It covers several areas and sets a wide range of targets for the EU's 2030 climate and energy framework such as: EU Emission trading system (EU ETS), EU wide renewable energy targets, including a specific target for renewables share in the transport sector (REDII &REDIII), renewable hydrogen targets, energy efficiency targets. From the regulatory background the

EU ETS system has the most significant effect on the financial statement The EU ETS system sets a limit on the total amount of greenhouse gases that can be emitted by entities under the system. Companies whose emissions surpass the regulated level have the option of purchasing additional quotas. As the Group operation can be covered only partially by the free allocation, thus quota purchase is needed. MOL Group can ensure this shortfall with forward purchases throughout the issue year, while taking into account the quarterly updated needs. This mechanism ensures efficient risk management of quota prices and an optimal financing structure. The purchasing mechanism followed by MOL Group ensures that large shifts in quota prices have a more limited impact on the Group's financial performance. During the year, a provision is also booked to cover the needs of the upcoming year. MOL Group purchases the CO_2 quota distributed during the year to achieve that the average purchase price be on the level of the average CO2 price. For more information and accounting policy on the emission rights please refer to Note 9/c and Note 16.

When making assumptions and judgements affecting the amounts reported in the financial statement, the Group uses the latest available and reliable information. The significant accounting estimates affecting the amounts reported in the financial statements are prepared in line with the long-term strategy of the Group, which represents management's best estimate of the possible outcomes and risks associated with the transition to a low carbon world. MOL Group acknowledges that the energy transition will occur, however the estimates of the impact of climate change and energy transformation on the Group's operations are subject to very high uncertainty and may change significantly in subsequent periods depending on the pace of the transition. MOL Group expects climate-related matters to have an impact on the long-term accounting estimates and incorporated these factors to the financial statements. Estimation inputs like: Brent oil prices, TTF gas prices CO2 quota price assumptions and discount rates take into consideration the effects of the climate related matters and are in line with external information and represent the effect of climate related expectations on the financial statement. In MOL's view CO_2 costs and price assumptions represent best the effects of climate change on the financial statements, as quotas are traded on an active market. Therefore, it is included as a risk element in the sensitivity analysis performed on the Clean CCS profit from operation, please refer to Note 20/b.

Significant accounting estimates that could be affected by the climate change and energy transition are:

Recoverability of assets: Impairment models are generally based on a going concern assumption, usually based on 3 years time series of business plan figures approved by the Board of Directors, further years are estimated considering expected changes in external environment. Any further initiative is subject to very high level of uncertainty and may change significantly in subsequent periods depending on several factors. For more information on the impairment of assets please refer to Note 9.

Useful lives of tangible and intangible assets: The useful life of PPE is reviewed at least once a year prior to the annual planning process and if the expectations differ significantly from the prior estimations, then the amount of depreciation relating to the current and the future periods must be adjusted. The useful life of assets are determined based on the currently valid regulations and obligations. For more information, please refer to Note 9.

Provision for future decommissioning liabilities: The value of liabilities required for calculation of the current value of provision is determined on the basis of estimated costs of works required for settlement of field suspension and field abandonment liabilities planned in full technical scope for each field. The economy calculations and the plans for future exploitation and utilization of fields incorporate information about the time when site restoration can be expectedly started and ended in the field. The estimation is in line with currently valid regulation and obligations. For more information on the decommissioning provisions and provisions related to climate change please refer to Note 16.

Significant impact on operation

a) Russia – Ukraine conflict

The economic consequences of Russia's invasion of Ukraine that commenced on 24 February 2022 may affect MOL Group. Management is continuously investigating and assessing the possible effects of the current geopolitical situation, international sanctions and other possible limitations on the supply chain and business activities. MOL Group has made decisions in its credit policy to minimise the exposure.

MOL Group is exposed to Russia mainly through BaiTex Llc. and related receivables. Payments made by BaiTex Llc. towards MOL Group in 2023 and 2024 are held on a restricted bank account as a result of counter-sanctions of Russia, therefore the amount is not available for general use. MOL Group impaired all the investment value, receivables, and the restricted bank account balance in 2023 and 2024. MOL Group exposure to Ukraine is not material.

MOL Group's refining business is exposed to the physical flow of crude oil through the transportation system in Russia and Ukraine. The physical flow of the crude oil from Russia has been periodically disrupted due to war damage on Ukrainian energy infrastructure. An alternative supply route from the Mediterranean Sea, via Croatia, exists however that can supply MOL Group refineries in Hungary and Slovakia with seaborne cargoes of crude oil. The European Union has imposed a partial embargo on Russian crude oil imports as of 5 December 2022 and on Russian petroleum product imports as of 5 February 2023. At the same time, a ban on the export of petroleum products obtained from Russian crude oil has been put in place. The regulations however allow for the continued import of Russian crude oil by pipeline, including to Hungary and Slovakia (from September 2024, crude oil hand over partially at Belarusian border), as well as the continued export of petroleum products obtained from Russian crude a) from Slovakia to the Czech Republic until 5 December 2024 and b) from Hungary and Slovakia indefinitely as long as the percentage of exports do not exceed the percentage of crude of non-Russian origin if blended with Russian crude as refinery feedstock. In December 2024, the derogation was prolonged for 6 months until 5 June 2025.

Management takes steps to manage the risk of possible oil supply disruptions, including consideration of alternative transport routes with adequate capacity. MOL Group has access to national reserves that it can supply to its markets in the event of the Druzhba's oil pipeline disruption.

b) Discovery of the new oil field

The test production of the well, named Vecsés-1, started on 19 May 2024 becoming MOL's 2nd highest yielding oil well in Hungary. Similarly to the former Vecsés-2 well, the oil is transported directly to the Danube Refinery in Százhalombatta for processing. Discovery will add another 1,300 barrels to the daily production of the Vecsés oil field, so that the two Vecsés wells together now account for over a quarter of MOL's Hungarian oil production. This new well increases MOL Group's total hydrocarbon production by approximately 1.5%. MOL plans to invest almost HUF 100 bn in the next 3 years in the development of oil and gas production in Hungary.

c) Develop gas reserves of the ACG field

MOL Group and its Joint Venture partners signed commercial agreements for the development of gas reserves in Azerbaijan. After SOCAR and BP, MOL Group are the third largest shareholder in the giant ACG field, where non-associated gas reservoirs were identified beneath and above the producing oil reservoirs. The commercial agreements amend the existing ACG production sharing agreement (PSA) framework, enabling the parties to progress the exploration, appraisal, development of and production from the gas reservoirs of the ACG field. ACG non-associated gas resources are believed to be significant, with up to 4 trillion cubic feet (ca. 112 billion cubic meters) in place. Drilling of the initial producing well has already started from the West Chirag Platform, with first gas expected in 2025.

d) New gas discovery in Drava-03 exploration block

INA has made a significant new gas discovery in the Drava-03 exploration area. At the Obradovci-5 well, located in Virovitica-Podravina County near the town of Zdenci, testing of the deepest B6 interval yielded a daily gas flow rate of approximately 144,000 m^3, while the B4 interval produced around 98,000 m^3 per day (cca 1500 boepd in total), as limited by the testing equipment. The initial estimate of discovered resources ranges between 120 and 150 million cubic meters of gas. INA plans to bring the well into production by the end of 2028, beginning with the deepest B6 interval. The discovery will provide additional revenue for the state and local communities through production sharing, mineral royalties, and other fees paid by INA as the investor.

e) Business Integration in Poland

As part of the integration, MOL's subsidiary operating in the wholesale market - Slovnaft Polska - will be incorporated into MOL Polska. The formal merger will allow to offer customers a coherent, comprehensive wholesale and retail offer.

f) Windfall taxes

As a result of the Russian-Ukrainian conflict and the emerging energy crisis, the Hungarian government and the EU have introduced a number of significant measures, which also affect MOL Group.

Mining royalty effective from 1 August 2022

The Hungarian oil and gas royalty rates were changed; the fixed parts of the rates were tripled in those categories in which the majority of MOL's production takes place. Final effective rates include unchanged adjusting elements dependent from the spot Brent and TTF prices. The unit values that are determined by Government Decree to be used for calculating the royalty base include minimum thresholds for 2023 and 2024. Production to be taken into account for the tax base in the period concerned cannot be lower than the 2021 level. In the event of a technical impediment or major event impacting production, approval is to be requested from the Mining Authority for the lower production. If the lower production is unjustified, the Mining Authority will still impose the additional mining royalty. The extra profit tax rules provided for the possibility of contracting in order to reduce the mining royalty. Accordingly, MOL. has made commitments exceeding the production volume. This resulted in a significant reduction in mining royalty from September 2023. If the commitment in any category is not met, the total volume committed in that category will be paid as a penalty under the previous, less favourable rule.

Extra profit tax on Brent-Ural spread

From 1 January 2022, the Hungarian government has introduced a Brent-Ural spread-based tax, which tax rate is 25% of the Brent-Ural spread on Ural type crude oil procurement. According to the amendment to the extra profit tax regulation issued by the Hungarian Government on 30 July 2022 effective from 1 August 2022 the Brent-Ural spread based extra profit tax rate on Ural type crude oil procurement was modified to 40%. According to the amendment to the extra profit tax regulation issued by the Hungarian Government on 18 December 2022 the Brent-Ural spread based extra profit tax rate on Ural type crude oil procurement has been modified to 95%. Prospectively from 1 April 2023, the tax based on the Brent-Ural spread would be 95% of the spread minus 7.5 USD. Effective form 1 August 2024 the deductible floor level of the tax is 5 USD/bbl. Impact of the amendment is mainly subject to future Brent-Ural spread and imported Russian crude oil volume by MOL Plc.

At the same time, a net revenue-based tax was introduced based on the 2022 net sales revenues with a tax rate of 2.8% for 2023. Revenue based tax has been extended for 2024 on the same tax base (2022 net sales revenues) but at lower (1%) tax rate. The revenue-based tax will be abolished from 2025.

Retail tax

The Hungarian Government modified the retail tax effective from 1 July 2022 due to which 80% of the 2021 tax had to be paid as a one-off additional tax in 2022. For 2023, tax rate per revenue ranges increase: in the range of HUF 500 million – HUF 30,000 million the rate will increase from 0.1% to 0.15%, in the range of HUF 30,000 million – HUF 100,000 million the rate will increase from 0.4% to 1%, above HUF 100,000 million the rate will increase from 2.7% to 4.1%. From 2024, the tax rate for the highest revenue rate increased to 4.5%, however for fuel products 3% tax rate applies (for all revenue ranges above 500 million HUF) for 2024.

In the statement of profit or loss the mining royalty, the extra profit tax, the retail tax are recorded in other operating expenses. These windfall taxes were considered when assessing the assets recoverability.

RESULTS FOR THE YEAR

This section explains the results and performance of the Group for the financial years ended 31 December 2024 and 31 December 2023. Disclosures are following the structure of statement of profit or loss and provide information on segmental data, total operating income, total operating expense, finance result, share of after-tax results of associates and joint ventures. For taxation, share-based payments, joint ventures and associates, statement of financial position disclosures are also provided in this section.

6. Segmental information

Accounting policies

For management purposes the Group is organised into five major operating business units: Upstream, Downstream, Consumer Services, Gas Midstream and Corporate and other segments. The business units are the basis upon which the Group reports its segment information to the management which is responsible for allocating business resources and assessing performance of the operating segments.

The major segments identified by MOL Group are the following:

Upstream segment consists of oil and gas exploration and production assets and the related activities.

Downstream segment consists of different business activities that are part of an integrated value chain. This value chain turns crude oil into a range of refined products, which are moved and marketed for household, industrial and transport use. The products include, among others, gasoline, diesel, heating oil, aviation fuel, lubricants, bitumen, sulphur and liquefied petroleum gas (LPG).

Consumer Services segment is a leading fuel retail operation in the CEE region, with a 10 million retail customer base and one million daily transactions. MOL Group owns numerous service companies covering oil field services, asset operations and maintenance management.

Gas Midstream segment includes our sole transmission system related activity in the nearly 6,000 km long high-pressure natural gas transmission pipeline system in Hungary.

Circular Economy segment is responsible for optimising the waste collection, transportation and treatment system in Hungary since July 1, 2023. MOL Group presents information about the segment separately from 2024.

Corporate and other segment includes all other business units of MOL Group.

2024	Upstream HUF million	Downstream HUF million	Consumer Services HUF million	Gas Midstream HUF million	Circular Economy HUF million	Corporate and other HUF million	Inter-segment transfers HUF million	Total HUF million
Net Revenue								
External sales	62,280	4,762,958	3,720,173	119,369	426,309	87,588	-	**9,178,677**
Inter-segment transfers	623,110	2,392,145	21,039	7,883	2,286	348,787	(3,395,250)	-
Total revenue	**685,390**	**7,155,103**	**3,741,212**	**127,252**	**428,595**	**436,375**	**(3,395,250)**	**9,178,677**
Profit/(loss) from operation	**231,846**	**247,047**	**193,788**	**72,366**	**(33,405)**	**(118,253)**	**(8,517)**	**584,872**
Depreciation, depletion, amortisation and impairment	**170,277**	**180,305**	**77,260**	**16,627**	**13,124**	**50,241**	**(1,392)**	**506,442**
From this: impairment losses recognised in statement of profit or loss (incl. dry-holes)	32,531	7,404	609	130	50	2,872	-	**43,596**
From this: reversal of impairment recognised in statement of profit or loss	(10,953)	(62)	(348)	-	-	(902)	-	**(12,265)**
EBITDA	**402,123**	**427,352**	**271,048**	**88,993**	**(20,281)**	**(68,012)**	**(9,909)**	**1,091,314**

2023	Upstream HUF million	Downstream HUF million	Consumer Services HUF million	Gas Midstream HUF million	Circular Economy HUF million	Corporate and other HUF million	Inter-segment transfers HUF million	Total HUF million
Net Revenue								
External sales	121,709	4,802,543	3,620,427	134,223	191,813	37,784	-	**8,908,499**
Inter-segment transfers	602,225	2,408,161	14,357	7,237	287	279,020	(3,311,287)	-
Total revenue	**723,934**	**7,210,704**	**3,634,784**	**141,460**	**192,100**	**316,804**	**(3,311,287)**	**8,908,499**
Profit/(loss) from operation	**238,659**	**329,134**	**121,994**	**76,368**	**11,734**	**(116,226)**	**15,912**	**677,575**
Depreciation, depletion, amortisation and impairment	**126,823**	**161,105**	**122,794**	**17,393**	**1,497**	**43,028**	**(956)**	**471,684**
From this: impairment losses recognised in statement of profit or loss (incl. dry-holes)	8,967	2,947	62,728	583	9	5,978	-	**81,212**
From this: reversal of impairment recognised in statement of profit or loss	3,414	182	1,583	-	-	2,031	-	**7,210**
EBITDA	**365,482**	**490,239**	**244,788**	**93,761**	**13,231**	**(73,198)**	**14,956**	**1,149,259**

2024	Upstream HUF million	Downstream HUF million	Consumer Services HUF million	Gas Midstream HUF million	Circular Economy HUF million	Corporate and other HUF million	Inter-segment transfers HUF million	Total HUF million
Other segment information								
Capital expenditure:	123,165	453,241	63,307	18,244	62,574	58,360	(2,411)	**776,480**
Property, plant and equipment	104,949	348,062	56,567	15,579	60,133	39,404	(2,411)	**622,283**
Intangible assets*	18,216	105,179	6,740	2,665	2,441	18,956	-	**154,197**
Provisions made and used during the year and revision of previous estimates	(7)	24,817	442	(117)	(20,249)	(661)	(1,789)	**2,436**
NON-CURRENT ASSETS								
Property, plant and equipment	925,091	2,009,517	964,239	246,027	134,197	396,290	(42,590)	**4,632,771**
Intangible assets	256,576	60,488	128,924	5,268	5,337	63,792	(2,945)	**517,440**
Investments in associates and joint ventures	214,182	12,568	-	-	-	18,004	-	**244,754**

*From which the increase of the green rights, presented as intangible assets, is HUF 108,967 million in the financial year

2023	Upstream HUF million	Downstream HUF million	Consumer Services HUF million	Gas Midstream HUF million	Circular Economy HUF million	Corporate and other HUF million	Inter-segment transfers HUF million	Total HUF million
Other segment information								
Capital expenditure:	135,480	337,665	64,808	13,462	22,197	57,387	-	**630,999**
Property, plant and equipment	120,634	231,110	59,486	11,284	21,899	37,626	-	**482,039**
Intangible assets*	14,846	106,555	5,322	2,178	298	19,761	-	**148,960**
Provisions made and used during the year and revision of previous estimates	(35,475)	11,745	(996)	(187)	353	(3,537)	1,639	**(26,458)**
NON-CURRENT ASSETS								
Property, plant and equipment	837,873	1,786,219	808,603	245,918	31,709	325,636	(38,157)	**3,997,801**
Intangible assets	233,998	107,981	114,413	4,077	349	77,485	(4,374)	**533,929**
Investments in associates and joint ventures	173,951	12,865	-	-	-	17,371	-	**204,187**

*From which the increase of the green rights, presented as intangible assets, is HUF 113,816 million in the financial year

The operating profit of the segments includes the profit arising both from external sales and transfers to other business segments. Corporate and other segment provides maintenance, financing and other services to the business segments. The internal transfer prices applied are based on prevailing market prices. Divisional figures contain the results of the fully consolidated subsidiaries engaged in the respective divisions. In the downstream, the capital expenditure of property, plant and equipment increased significantly due to the estabilishment of Polyol unit in MPC.

The differences between the capital expenditures presented above and the additions in the intangible and tangible movement schedule are due to the additions of emission rights, and non-cash items such as capitalisation of field abandonment provisions, and assets received free of charge.

a) Assets by geographical areas

2024	Intangible assets (Note 9) HUF million	Property, plant and equipment (Note 9) HUF million	Investments in associates and joint ventures (Note 6) HUF million	Other non-current assets (Note 13) HUF million
Hungary	128,068	2,091,962	28,689	12,560
Croatia	92,578	809,702	1,637	11,407
Slovakia	16,025	636,858	6,771	120
Azerbaijan	196,782	460,597	-	-
Rest of European Union	76,920	520,311	-	50,073
Rest of Europe	999	65,093	-	68
Rest of the World	6,068	48,248	207,657	715
Total	**517,440**	**4,632,771**	**244,754**	**74,943**

2023	Intangible assets (Note 9) HUF million	Property, plant and equipment (Note 9) HUF million	Investments in associates and joint ventures (Note 6) HUF million	Other non-current assets (Note 13) HUF million
Hungary	176,819	1,755,639	28,827	14,409
Croatia	73,487	714,706	1,484	7,763
Slovakia	15,414	535,276	6,324	3,012
Azerbaijan	181,450	410,790	-	-
Rest of European Union	72,064	475,641	-	44,190
Rest of Europe	1,186	60,785	-	54
Rest of the World	5,149	44,964	167,552	2,567
Total	**525,569**	**3,997,801**	**204,187**	**71,995**

7. Total operating income

Accounting policies

Net sales

IFRS 15 established a five-step model to account for revenue arising from contracts with customers and requires that revenue to be recognised at an amount that reflects the consideration to which the Group expects to be entitled in exchange for transferring goods or services to a customer. Revenue is recognised when it is probable that the economic benefits associated with a transaction will flow to the enterprise and the amount of the revenue can be measured reliably. Sales are recognised when control of the goods or services are transferred to the customer.

The Group has generally concluded that:

• it satisfies performance obligations at a point in time, because control is transferred to the customer on delivery of the goods. Under IFRS, the transfer of risk according to Incoterms rules applied by the Group is not a sufficient criterion for recognizing revenue, because IFRS 15 Revenue from Contracts with Customers is based on the control concept. For performance obligations to be satisfied at a particular point in time, the Group has to determine at which point in time the customer obtains control of the promised goods. The transfer of significant risk and rewards of ownership of an asset – which equals the transfer of risk as defined in the Incoterms rules – is only one indicator to consider in determining when control has been transferred. The Group may apply different Incoterms rules to different transactions (nearly all known Incoterms rules are used by the Group), thus the transfer of control shall be assessed individually in each case.

• it is the principal in its revenue arrangements, because it typically controls the goods or services before transferring them to customers (except to those cases, which are explicitly stated in the Consolidated Financial Statements);

• significant financing component does not exist, because the period between the transfer of the promised good or service to the customer and when the customer pays for that good or service is expected to be one year or less at contract inception.

Lease income

Lease income from operating lease is recognised on a straight-line basis over the lease term.

Sales taxes

Revenues, expenses and assets are recognised net of the amount of sales tax (e.g. excise duty), except:

- when the sales tax incurred on a purchase of assets or services is not recoverable from the taxation authority (e.g. if the entity is not subject of sales tax), in which case, the sales tax is recognised as part of the cost of acquisition of the asset or as part of the expense item, as applicable
- receivables and payables that are stated with the amount of sales tax included.

The net amount of sales tax recoverable from, or payable to, the taxation authority is included as part of receivables or payables in the consolidated statement of financial position.

Other operating income

Other operating income is recognised on the same accounting policy basis as the net sales.

a) Sales by product lines

	2024 HUF million	2023 HUF million
Sales of crude oil and oil products	6,389,174	6,658,446
Sales of petrochemical products	896,387	911,249
Sales of services	653,289	440,770
Sales of natural gas and gas products	487,670	381,114
Sales of retail shop products	418,338	310,438
Sales of other products	333,819	206,482
Total	**9,178,677**	**8,908,499**

Increase in the Group’s sales revenue is mainly due to the operation of MOHU Plc. started on 01.07.2023, INA and MOL Slovenia performance were better (price cap regulation leading to higher fuel demand and acquisition effect).

b) Sales by geographical area

	2024 HUF million	2023 HUF million
Hungary	2,599,373	2,512,546
Croatia	1,106,831	1,071,199
Slovakia	1,019,541	1,025,388
Poland	811,115	818,150
Romania	603,553	581,143
Czech Republic	555,155	622,897
Italy	537,514	494,954
Slovenia	383,939	270,262
Serbia	277,533	239,176
Austria	260,737	325,856
Bosnia-Herzegovina	214,749	204,647
Germany	152,958	174,863
Switzerland	143,739	137,964
Luxembourg	106,810	5,756
United Kingdom	63,420	107,966
The Netherlands	43,075	47,760
Rest of Central-Eastern Europe	55,066	57,334
Rest of Europe	142,013	124,469
Rest of the World	101,556	86,169
Total	**9,178,677**	**8,908,499**

The Group has no single major customer the revenue from which would exceed 10% of the total net sales revenues in 2024 (neither in 2023).
The sales revenue is split by the method of the customer's registered office.
Based on the IFRS 15 Revenue from Contracts with Customers standard agent-principal consideration, excise duties and similar levies or fees are recognised with net presentation in the financial statements as MOL and its companies act as an „agent" and collects the excise duties from third parties to the state. Total amount of the excise duty collected from customers was HUF 1,933,997 million in 2024 and HUF 1,778,682 million in 2023.

c) Other operating income

	2024 HUF million	2023 HUF million
Penalties, late payment interest, compensation received	9,309	11,170
Gain on sales of intangibles, property, plant and equipment	28,699	9,488
Net gain of non-hedge commodity price transactions*	-	9,011
Allowances and subsidies received	13,896	5,871
Reimbursement of legal costs	-	-
Gain from the sale of companies	227	277
Income from valuation of emission quotas	-	-
Other	17,706	21,720
Total	**69,837**	**57,537**

* The net result of the non-hedge commodity price transactions was loss in current year (see Note 4)

The Other operating income includes Gain on sales of intangibles, property, plant and equipment. Gain on sale of property, plant and equipment increased by HUF 19,211 million compared to 31 December 2023. The gain mainly involves asset sale to Orlen (transaction was closed in 2024 Q2).

8. Total operating expenses

Accounting policies

Total operating expense

If specific standards do not regulate, operating expenses are recognised at point in time or through the period basis. When a given transaction is under the scope of specific IFRS transaction it is accounted for in line with those regulations.

The Group has classified payments for leases of low value assets, short-term lease payments and variable lease payments not included in the measurement of lease liability within operating activities.

	2024 HUF million	2023 HUF million
Raw materials and consumables used	**7,360,586**	**6,761,197**
Crude oil purchased	2,394,109	2,377,141
Cost of goods purchased for resale	2,899,615	2,516,785
Non-hydrocarbon-based material	597,961	596,087
Value of material-type services used	730,535	491,351
Other raw materials	323,737	295,410
Utility expenses	166,177	239,574
Purchased bio diesel component	137,228	171,406
Value of inter-mediated services	111,224	73,443
Employee benefits expense	**444,386**	**384,356**
Wages and salaries	322,802	271,779
Social security	58,989	52,315
Other employee benefits expense	62,595	60,262
Depreciation, depletion, amortisation and impairment	**506,442**	**471,684**
Other operating expenses	**627,988**	**672,547**
Taxes and contributions	133,075	191,824
Mining royalties	87,944	168,192
Other	81,915	89,266
Other services	116,056	71,169
Bank charges	12,255	32,169
Rental cost	21,105	22,623
Consultancy fees	23,270	22,311
Advertising expenses	20,050	19,206
Insurance fees	16,580	15,248
Provision for greenhouse gas emission over quota allocated free of charge	73,477	15,037
Cleaning costs	14,427	11,449
Site security costs	8,962	8,139
Contribution in strategic inventory storage	6,537	5,914
Net loss of non-hedge commodity price transactions*	12,335	-
Change in inventory of finished goods and work in progress	**(118,501)**	**101,601**
Work performed by the enterprise and capitalised	**(157,259)**	**(102,924)**
Total operating expenses	**8,663,642**	**8,288,461**

* The net result of the non-hedge commodity price transactions was gain in previous year (see Note 3/c)

Based on the IFRS 15 Revenue from Contracts with Customers standard agent-principal consideration, excise duties and similar levies or fees are recognised with net presentation in the financial statements as MOL and its companies act as an „agent" and collects the excise duties from third parties to the state.

Other operating expenses are mainly driven by the provision for greenhouse gas emission, other services (mainly due to the COCA Agents remuneration in MOL Polska) and result of fair valuation of commodity derivatives which is loss in 2024 compared to 2023 when it was a gain, offset by the extra profit taxes:

- Mining royalty: In 2023 the extra profit tax rules provided for the possibility of contracting in order to reduce the mining royalty. Accordingly, MOL Plc. has made commitments exceeding the production volume. This resulted in a significant reduction in mining royalty from September 2023. If the commitment in any category is not met, the total volume committed in that category will be paid as a penalty under the previous, less favourable rules.
- Brent-Ural spread based tax: Effective from 1 August 2022 the Brent-Ural spread based extra profit tax rate on Ural type crude oil procurement was modified to 40%. From 1 April 2023, the tax based on the Brent-Ural spread is 95% of the spread minus 7.5 USD. Effective from 1 August 2024 the deductible floor level of the tax is 5 USD. At the same time, a net revenue-based tax was introduced based on the 2022 net sales revenues with a tax rate of 2.8% for 2023. Revenue based tax has been extended for 2024 on the same tax base (2022 net sales revenues) but at lower (1%) tax rate. The revenue-based tax will be abolished from 2025.

- Retail tax: For 2023, tax rate per revenue ranges increase: in the range of HUF 500 million – HUF 30,000 million the rate will increase from 0.1% to 0.15%, in the range of HUF 30,000 million – HUF 100,000 million the rate will increase from 0.4% to 1%, above HUF 100,000 million the rate will increase from 2.7% to 4.1%. From 2024, the tax rate for the highest revenue rate increased to 4.5%, however for fuel products 3% tax rate applies (for all revenue ranges above 500 million HUF) for 2024.

Other item line contains several different types of expenses, which are individually not significant.

Employee benefit expenses

Other employee benefits expenses contain fringe benefits, reimbursement of expenses and severance payments.

Share-based payments

Certain employees (including directors and managers) of the Group receive remuneration in the form of share-based payment transactions, whereby employees render services in exchange for shares or rights over shares.

Equity-settled transactions

The cost of equity-settled transactions is measured at their fair value at grant date. The fair value is determined by applying generally accepted option pricing models (usually binomial model). In valuing equity-settled transactions, only market conditions are taken into consideration (which is linked to the share price of the parent company).

The cost of equity-settled transactions is recognised, together with a corresponding increase in equity, over the period in which the performance conditions are fulfilled, ending on the date on which the relevant employees become fully entitled to the award ('vesting date'). The cumulative expense recognised for equity settled transactions at each reporting date until the vesting date reflects the extent to which the vesting period has expired and the number of awards that, in the opinion of the directors of the Group at that date, based on the best available estimate of the number of equity instruments that will ultimately vest.

The dilutive effect of outstanding options is reflected as additional share dilution in the computation of earnings per share.

Cash-settled transactions

The cost of cash-settled transactions is measured initially at fair value at the grant date using the binomial model. This fair value is expensed over the vesting period with recognition of a corresponding liability. The liability is re-measured at each balance sheet date up to and including the settlement date to fair value with changes therein recognised in the statement of profit or loss.

	2024 HUF million	2023 HUF million
Absolute Share Value Based Remuneration	-	(13)
Relative Market Index Based Remuneration	-	(11)
Restricted Share Plan	124	440
Short-term Share Ownership Plan	1,107	1,040
Share-based retirement benefit	28	265
Total cash-settled share-based payment expense	**1,259**	**1,721**
Absolute Share Value Based Remuneration	-	(277)
Relative Market Index Based Remuneration	-	(162)
Restricted Share Plan	2,714	2,707
Short-term Share Ownership Plan	(71)	864
Share Incentive scheme for the members of the Board of Directors	617	615
Total equity-settled share-based payment expense	**3,260**	**3,747**
Total expense of share-based payment transactions	**4,519**	**5,468**

The share-based payments serve as the management's long-term incentives as an important part of their total remuneration package. They ensure the interest of the top and senior management of MOL Group in the long-term increase of MOL share price and so they serve the strategic interest of the shareholders.

Absolute Share Value Based Remuneration Plan

The Absolute Share Value Based Remuneration Plan is a call option to sell hypothetical MOL shares granted on a past strike price, at a spot price and so realise profit from the difference between these prices. The incentive has the following characteristics:

- Covers a four-year period starting annually, where periods are split into a two-year vesting period (it is not possible to exercise Share Options) and a two-year redeeming period. If unexercised, the Share Option lapses after 31 December of the redeeming period.
- The grants are defined centrally in line with MOL job category.
- The allocation is linked to individual performance.
- Payout is either in the form of providing MOL shares (in Hungary) or in cash payment (outside Hungary).

Payment is upon exercising of option by management. The value of the incentive is the difference between the strike price and a selected spot price for each unit of the entitlement.

In case the Annual General Meeting of MOL Plc. decides on dividend payment after the grant date, the managers, who are entitled to long-term incentives are eligible for a compensation in share equivalent when redeeming the share entitlement. Payment to one manager is the value equal to the dividend payment per share multiplied by the share unit numbers the manager is entitled to. This is paid at redemption.

Equity-settled share-based payment:

	2024 Number of shares in conversion option units	2024 Weighted average exercise price	2023 Number of shares in conversion option units	2023 Weighted average exercise price
	number of shares	HUF/share	number of shares	HUF/share
Outstanding at the beginning of the year	**-**	**-**	**1,695,704**	**2,918**
Granted during the year	-	-	-	-
Forfeited during the year	-	-	(331,080)	2,918
Exercised during the year	-	-	(1,364,624)	2,918
Expired during the year	-	-	-	-
Outstanding at the end of the year	**-**	**-**	**-**	**-**
Exercisable at the end of the year	-	-	-	-

Cash-settled share-based payment:

	2024 Number of shares in conversion option units	2024 Weighted average exercise price	2023 Number of shares in conversion option units	2023 Weighted average exercise price
	number of shares	HUF/share	number of shares	HUF/share
Outstanding at the beginning of the year	**-**	**-**	**108,306**	**2,918**
Granted during the year	-	-	-	-
Forfeited during the year	-	-	-	-
Exercised during the year	-	-	(108,306)	2,918
Expired during the year	-	-	-	-
Outstanding at the end of the year	**-**	**-**	**-**	**-**
Exercisable at the end of the year	-	-	-	-

Liabilities in respect of share-based payment plans amount to HUF 0 million as at 31 December 2024, all options were exercised during 2023.

Relative Market Index Based Remuneration Incentive for management

The Relative Market Index Based Remuneration Plan is a three-year programme using the Comparative Share Price methodology with following characteristics:

- Programme starts each year on a rolling scheme with a three-year vesting period. Payments are due after the third year.
- Target is the development of MOL's share price compared to relevant and acknowledged regional and industry specific indicators (the CETOP and MSCI Emerging Markets Energy Index).
- Basis of the evaluation is the average difference in MOL's year-on-year (12 months) share price performance in comparison to the benchmark indices for three years.
- Payout rates are defined based on the over/underperformance of MOL share price.
- The rate of incentive is influenced by the individual short-term performance.
- Payout is either in the form of providing MOL shares (in Hungary) or in cash payment (outside Hungary).

Restricted Share Plan for management

From 1 January 2021, the MOL Group established a new share-based payment remuneration plan to supersede Absolute Share Value Based Remuneration and Relative Market Index Based Remuneration programmes: Restricted Share Plan.

The Restricted Share Plan is a three-year incentive programme based on determined corporate and individual performance targets with following characteristics:

- Programme starts each year on a rolling scheme with a three-year vesting period. Payments are due after the third year.
- Target on corporate performance is based on the achievement of business plan for Clean CCS EBITDA.
- Payout rates are defined based on fulfilment of the corporate performance target and individual payout rate which is based on an individual performance.
- Payout is either in the form of providing of MOL shares (in Hungary) or in cash payment (outside Hungary).
- The fair value of the benefit has been determined with reference to the average quoted price of MOL shares at the date of grant of HUF 2,817 per share in 2024 (HUF 2,611 per share in 2023), which is the first trading day of the first year of the programme.

Short-term Share Ownership Incentive for management

Short-term Share Ownership Plan is a one-year programme with the following characteristics:

- Programme starts each year on a rolling scheme with a one-year vesting period. Payments are due in the following year.
- The grants are defined based on participant's base salary, internal grade and related bonus rate.
- The rate of incentive is influenced by the individual short-term performance during vesting period.
- Payout is in the form of providing MOL shares or in cash payment.

Share Incentive scheme for the members of the Board of Directors

The members of the Board of Directors become entitled to defined annual amount of MOL shares based on the number of days spent in the position. 1,600 shares per month are granted to each director, the Chairman of the Board is entitled to an additional number of 400 shares per month. If not a non-executive director is in charge as the Chairman of the Board, then this additional number of shares should be granted to the non-executive Deputy Chairman. The new incentive system ensures the interest of the Board of Directors in the long-term increase of the MOL share price as 2/3 of the shares vested in the year are under transferring restriction for one year.

According to IFRS 2 – Share-based payment, the incentive qualifies as an equity-settled share-based scheme; therefore, the fair value of the benefit should be expensed during the one-year investing period with a corresponding increase in the equity. The fair value of the benefit has been determined with reference to the average quoted price of MOL shares at the date of grant, which is the first trading day of the year.

	2024 HUF million	2023 HUF million
Number of shares vested	203,200	216,000
Share price at the date of grant (HUF/share)	2,817	2,611

Share-based retirement benefit

The MOL Group operates in some Group entities long-term benefit schemes that provide lump sum benefits to all employees at the time of their retirement. As part of the benefit programme employees are entitled to the amount of 8 or 10 MOL Plc. shares after every year of services. The amount of the liability has been determined using the projected unit credit method, based on financial and actuarial variables and assumptions that reflect relevant official statistical data which are in line with those incorporated in the business plan of the Group. The applied MOL Plc. share price is HUF 2,684 in 2024 (2,826 in 2023).

9. Finance result

Accounting policies

Foreign exchange gains and losses are aggregated separately on a monthly basis for transactions similar in nature. Foreign exchange gains or losses of each transaction group are aggregated and presented in the statement of profit or loss within finance income and expense.

Non-foreign exchange type items are not aggregated in such manner and presented separately based on the total income/expense for the year.

Finance result	2024 HUF million	2023 HUF million
Interest income	23,968	53,133
Dividend income	3,562	1,666
Foreign exchange gains	53,221	136,022
Other finance income	8,049	4,356
Total finance income	**88,800**	**195,177**
Interest expense	21,636	27,765
Unwinding of discount on provisions	36,558	25,157
Foreign exchange losses	93,978	123,778
Other finance expense	3,544	5,951
Total finance expense	**155,716**	**182,651**
Net finance expense (+) / income (-)	**66,916**	**(12,526)**

Interest expense on lease liabilities accounted for in the period is HUF 14,022 million (2023: HUF 13,544 million). Finance income on the net investment in the lease accounted for in the period is HUF 392 million (2023: HUF 442 million). For other information on lease agreements please refer to Note 9/a and Note 20/c. Dividend income relates to equity instruments which are designated upon initial recognition as at fair value through other comprehensive income.

10. Investments in associates and joint ventures

Accounting policies

Statement of financial position

An associate is an entity over which the Group has significant influence, and which is neither a subsidiary nor a joint venture. An arrangement is under joint control when the decisions about its relevant activities require the unanimous consent of the parties sharing the control of the arrangements. Joint arrangements can be joint operation and joint venture. The type of the arrangement should be determined by considering the rights and obligations of the parties arising from the arrangement in the normal course of business. Joint ventures are joint arrangements in which the parties that share control have rights to the net assets of the arrangement.

The Group's investments in its associates and joint ventures are accounted for using the equity method of accounting. Under the equity method, the investment in the associate is carried at cost plus post acquisition changes in the Group's share of net assets. Goodwill relating to an undertaking is included in the carrying amount of the investment and is not amortised.

Investments in associates and joint ventures are assessed to determine whether there is any objective evidence of impairment. If there is evidence of impairment the recoverable amount of the investment is determined to identify any impairment loss to be recognised. Where losses were made in previous years, an assessment of the factors is made to determine if any loss may be reversed.

Statement of profit or loss

The statement of profit or loss reflects the share of the results of operations of the associate and joint ventures. Profits and losses resulting from transactions between the Group and the equity accounted undertakings are eliminated to the extent of the interest in the undertaking. Impairment losses on associates and joint ventures for the period is recognised as a reduction on Share of after-tax results of associates and joint ventures line in the Statement of profit or loss.

			Ownership	Contribution to net income		Net book value of investments	
			2024	2024	2023	2024	2023
			%	HUF million	HUF million	HUF million	HUF million
Investment in joint ventures							
BaiTex Llc. / MK Oil and Gas B.V.	Russia / Netherlands	Exploration and production activity / Exploration investment management	51%	3,682	2,368	-	-
ENEOS MOL Synthetic Rubber Plc.	Hungary	Production of synthetic rubber	49%	(4,522)	(7,851)	-	5
Rossi Biofuel Plc.	Hungary	Biofuel component production	25%	1,510	1,619	8,054	8,631
Dunai Vízmű Plc.	Hungary	Water production, supply	33%	2	8	129	127
Datapac Group	Slovakia	IT services	25%	30	28	762	721
ALTEO Plc.	Hungary	Energy supplier	25%	2,528	1,092	15,620	15,150
Mogyoród Koncessziós Ltd.	Hungary	Exploration and production activity	49%	1,476	703	4,003	2,312
Nagykáta Koncessziós Ltd.	Hungary	Exploration and production activity	49%	(1,510)	(5)	465	2,204
Ócsa Koncessziós Ltd.	Hungary	Exploration and production activity	49%	(26)	392	418	397
Other			0%	149	66	1	2
Investment in associated companies							
Pearl Petroleum Ltd.	Kurdistan region/Iraq	Exploration of gas	10%	15,065	8,212	191,111	167,551
BTC	Cayman Islands	Oil transportation	9%	2,194	(483)	-	-
Ural Group Limited	Kazakhstan	Exploration and production activity	28%	3,365	(6,447)	16,546	-
Meroco a.s.	Slovakia	Production of bio-dieselcomponent (FAME)	25%	286	396	3,500	3,237
DAC ARENA a.s.	Slovakia	Facility management	28%	18	3	1,621	1,500
Messer Slovnaft s.r.o	Slovakia	Production of technical gases	49%	59	84	887	867
Plinara d.o.o. Pula	Croatia	Distribution and gas trading	49%	29	6	1,140	1,029
Plinara Istočne Slavonije d.o.o. za opskrbu plinom	Croatia	Distribution network of gas fuels	40%	12	23	497	454
Total				**24,347**	**214**	**244,754**	**204,187**

* Net asset value increased due to share conversion. The loan impairment was eliminated.

Joint ventures

MK Oil and Gas B.V.

MOL Group has 51% ownership in MK Oil and Gas B.V. being the sole owner of Baitex Llc., where the activities are carried out through a concession agreement on Baitugan and Yerilkinksy blocks. Joint control exists over MK Oil and Gas B.V. as the relevant activities of the company require unanimous consent of the parties sharing the control of the operation giving the parties right to the net assets of the arrangement. MK Oil and Gas B.V. is primarily involved in the exploration and production of oil and gas through its subsidiary at the Baitugan field. MOL Group impaired all of its assets located in Russia including BaiTex Llc. Please refer to Note 1 a) for further information.

Rossi Biofuel Plc.

MOL Group has minority ownership in Rossi Biofuel Plc. and it has joint control over the company. The core activity of Rossi Biofuel is biodiesel production from fresh vegetable oil and used cooking oil. This activity is carried out on the basis of IPPC Permit. The core activity of Rossi Biofuel is biodiesel production from fresh vegetable oil and used cooking oil. This activity is carried out on the basis of IPPC Permit.

Alteo Plc.

MOL Group acquired 24,607% ownership in Alteo Plc. at Q1 2023 (4.079% for 3,040 huf/share, 20.525% for 2,872 huf/share). The acquisition is in line with MOL Plc.'s 2030 strategy, which aims to increase its presence in the green market. Alteo has a wide portfolio, which includes 69 MW of renewable, mainly wind and solar energy capacity. Alteo also provides operation and maintenance services to power plants and also active in energy trading, waste management and e-mobility.

ENEOS MOL Synthetic Rubber Plc.

The company is governed and treated jointly with 51% of total shares held by ENEOS group and 49% of total shares held by MOL Group. JSR, the former majority shareholder of the company, sold its shares to ENEOS group in 2022. Share transfer transaction between JSR and ENEOS group was closed in April 2022 when ENEOS Materials Corporation became the 51% owner. As of May 1st 2022 the company name changed from JSR MOL to ENEOS MOL Synthetic Rubber Ltd. The transaction did not affect the everyday operation of the

Tiszaújváros plant, where the company manufactures synthetic rubber. At the end of September 2024, was reclassified as held for sale at HUF nil. Sale price will be accounted for at the closing of the transaction (30 January 2025).

	BaiTex Llc. / MK Oil and Gas B.V.		Rossi Biofuel Plc.	
	2024	2023	2024	2023
	HUF million	HUF million	HUF million	HUF million
The joint venture's statement of financial position:				
Non-current assets	35,043	33,574	46,702	35,298
Current assets	19,256	17,259	21,828	28,746
Non-current liabilities	4,352	8,627	20,951	12,594
Current liabilities	8,333	10,462	15,364	16,927
Net assets	**41,614**	**31,744**	**32,215**	**34,523**
Proportion of the Group's ownership at year end	51%	51%	25%	25%
Group's share of assets	**21,223**	**16,189**	**8,054**	**8,631**
Fair value adjustment	243	952	-	-
Impairment	(21,466)	(17,141)	-	-
Carrying amount of the investment	-	-	**8,054**	**8,631**
The joint venture's statement of profit or loss:				
Net revenue	60,936	57,471	89,551	91,805
Profit/(loss) from operations	14,484	26,120	3,110	1,086
Net income attributable to equity holders	11,995	15,164	6,038	6,477
Group's share of reported profit/(loss) for the year	**6,117**	**7,734**	**1,510**	**1,619**
Fair value adjustment P&L impact	(712)	(790)	-	-
Inventory consolidation P&L impact	141	(6)	-	-
Impairment	(1,864)	(4,570)	-	-
Group's share of profit/(loss) for the year after consolidation	**3,682**	**2,368**	**1,510**	**1,619**

	ALTEO Plc.		ENEOS MOL Synthetic Rubber (EMSR) Plc.	
	2024	2023	2024	2023
	HUF million	HUF million	HUF million	HUF million
The joint venture's statement of financial position:				
Non-current assets	49,655	39,966	112,227	108,654
Current assets	37,101	45,104	26,868	42,031
Non-current liabilities	28,060	31,671	135,224	134,145
Current liabilities	22,112	18,724	9,638	15,716
Net assets	**36,584**	**34,675**	**(5,767)**	**824**
Proportion of the Group's ownership at year end	25%	25%	49%	49%
Group's share of assets	**9,001**	**8,531**	**(2,826)**	**404**
Goodwill	6,619	6,619	-	-
Impaired from given loan	-	-	2,826	-
Inventory consolidation - margin elimination	-	-	-	(399)
Carrying amount of the investment	**15,620**	**15,150**	**-**	**5**
The joint venture's statement of profit or loss:			-	
Net revenue	96,890	40,794	17,890	31,967
Profit/(loss) from operations	13,243	6,303	(6,072)	(7,741)
Net income attributable to equity holders	10,024	5,602	(9,228)	(16,022)
Group's share of reported profit/(loss) for the year	**2,466**	**1,378**	**(4,522)**	**(7,851)**
MRP	62	(286)	-	-
Group's share of profit/(loss) for the year after consolidation	**2,528**	**1,092**	**(4,522)**	**(7,851)**

Associates

Pearl Petroleum Company Limited

MOL Group owns 10% stake in Pearl Petroleum Company Limited (Pearl) which holds all of the companies' legal rights in Khor Mor and Chemchemal gas-condensate fields in the Kurdistan Region of Iraq. MOL shall be entitled to appoint a director. 100% approval by the Board of Directors is required for financing and other contractual clauses. Since the agreement between the shareholders grants MOL Group a significant influence on Pearl's operations, the company is treated as an associated company and is consolidated using the equity method accordingly. On Pearl investment an impairment of HUF 2,104 million was recognised for 2024.

Annual dividend is depend on the repayment of outstanding receivables. There was no dividend in 2024 and 2023.

Ural Group Limited

MOL Group has 27.5% of shareholding interest in Ural Group Limited through MOL (FED) Kazakhstan B.V., a holding company. Ural Group Limited is 100% owner of Ural Oil and Gas LLP having license of exploring Fedorovsky block in Kazakhstan. MOL Group has significant influence over the relevant activities of Ural Group Limited therefore the investment is classified as an associate. In 2023 loss from Ural Group Limited booked on loan is HUF -38,451 million. In 2024, share conversion was made, resulting in a net asset value for MOL Group HUF +16,546 million and the loan was written off.

Meroco

The Group has 25% ownership in Meroco a.s., a biodiesel producer company located in Slovakia. The biodiesel produced in the company is mixed with diesel fuel, which helps to reduce the dependence on oil imports, since a part of demand for fuel is covered by domestically produced biofuel. Biodiesel is a renewable source of energy that can be counted on in the future, since it is practically inexhaustible. There was no dividend in 2024 and 2023.

Below tables include the most relevant associates for the Group based on materiality:

	Pearl Petroleum Ltd.		Ural Group Limited		Meroco a.s.	
	2024	2023	2024	2023	2024	2023
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
The associate’s statement of financial position:						
Non-current assets	1,067,946	916,959	129,620	82,996	9,005	9,140
Current assets	374,207	244,781	11,972	6,888	22,147	41,929
Non-current liabilities	274,517	137,628	43,105	216,569	5,796	6,950
Current liabilities	109,428	117,870	38,321	13,136	11,357	31,173
Net assets	**1,058,208**	**906,242**	**60,166**	**(139,821)**	**13,999**	**12,946**
Proportion of the Group's ownership at year end	10%	10%	27.5%	27.5%	25.0%	25.0%
Group's share of assets	**105,821**	**90,624**	**16,546**	**(38,451)**	**3,500**	**3,237**
Goodwill	111,065	97,757	-	-	-	-
Accumulated impairment	(25,775)	(20,830)	-	-	-	-
Impaired from given loan	-	-	-	38,451	-	-
Dividend received over impairment	-	-	-	-	-	-
Carrying amount of the investment	**191,111**	**167,551**	**16,546**	**-**	**3,500**	**3,237**
The associate’s statement of profit or loss:						
Net revenue	234,643	220,069	33,315	21	55,995	56,947
Profit/(loss) from operations	160,268	151,687	8,698	(2,238)	1,344	1,986
Net income attributable to equity holders	171,698	158,242	12,238	(23,445)	1,143	1,585
Group's share of reported profit/(loss) for the year	**17,169**	**15,824**	**3,365**	**(6,447)**	**286**	**396**
Movements on impairment	(2,104)	(7,612)	-	-	-	-
Group's share of consolidated profit/(loss) for the year	**15,065**	**8,212**	**3,365**	**(6,447)**	**286**	**396**

11. Income taxes

Accounting policies

Income tax is recognised in the statement of profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity, in which case the related tax is recognised in other comprehensive income or directly in equity.

The current income tax is based on taxable profit for the year. Taxable profit differs from accounting profit because of temporary differences between accounting and tax treatments and due to items that are never taxable or deductible or are taxable or deductible in other years. Full provision for deferred tax is made on the temporary differences between the carrying value of assets and liabilities for financial reporting purposes and their value for tax purposes using the balance sheet liability method. Deferred tax is calculated using tax rates that have been enacted or substantively enacted by the end of the reporting year and are expected to apply to taxable income in the years in which those temporary differences are expected to be recovered or settled.

Deferred tax assets are recognised where it is more likely than not that the assets will be realised in the future. At each balance sheet date, the Company re-assesses unrecognised deferred tax assets and the carrying amount of deferred tax assets. No deferred tax liability is provided in respect of any future remittance of earnings of foreign subsidiaries where the Group is able to control the remittance of earnings and it is probable that such earnings will not be remitted in the foreseeable future, or where no liability would arise on the remittance.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities which relate to income taxes imposed by the same taxation authority and the Group intends to settle its current tax assets and liabilities on a net basis.

Significant accounting estimates and judgements

Corporate tax is required to be estimated in each tax jurisdiction in which MOL Group operates. The recognition of tax benefits requires management judgement. Tax provisions are based on management’s judgement and interpretation of country specific tax law and the likelihood of settlement. The actual tax liability may differ from the provision and adjustment in subsequent period could have a material effect on the Group’s profit for the year.

MOL Group makes judgements in assessing the likelihood of potentially material exposures and develops estimates to determine provisions where required and considers whether contingent liability disclosures should be made.

The evaluation of deferred tax assets recoverability requires judgements regarding the likely timing and the availability of future taxable income. Deferred tax asset recoverability and any related judgement are based on the Group's business plans.

Temporary exception related to Pillar Two income taxes according to IAS 12

In accordance with paragraph 4A of IAS 12 the Group applies the temporary exception and neither recognise nor disclose information about deferred tax assets and liabilities related to Pillar Two income taxes.

a) Analysis of taxation charge for the year

Total applicable income taxes reported in the consolidated financial statements for the years ended 31 December 2024 and 31 December 2023 include the following components:

	2024	2023
	HUF million	HUF million
Current corporate income tax and industry taxes	77,849	123,138
Minimum GloBE tax	145	-
Windfall tax	6,041	-
Local trade tax and innovation fee	38,828	34,228
Deferred tax expense/(benefit)	22,737	(33,852)
Income tax expense attributable to profit from continuing operation	**145,600**	**123,514**
Income tax expense attributable to profit from discontinued operation	-	-
Total income tax expense	**145,600**	**123,514**

b) Current income taxes

The Group's current income taxes are determined on the basis of taxable statutory profit of the individual companies of the Group. Group taxation is applied in jurisdictions where local legislation includes such provisions.

Industry taxes generally include tax on energy supply activities in Hungary. MOL Plc. would be taxed at an effective rate of 25% in 2024 (2023: 27%) if there were a positive tax base.

GloBE tax line includes the top-up tax on profits arising in jurisdictions where the effective tax rate is below 15% and no safe-harbour is applicable. Please refer to Note 7/g for more detailed information.

Windfall tax for 2024 includes solidarity contribution in Slovakia and windfall tax valid in the Czech Republic. Extra profit taxes that are not in the scope of IAS 12 Income taxes standard are presented as operating expenses in the consolidated statement of profit or loss.

Local trade tax represents mainly an income-based tax for Hungarian entities, payable to local municipalities. Tax base is calculated by deducting material costs, cost of goods sold and remediated services from sales revenue. Tax rates vary between 0-2% dependent on the regulation of local municipalities where the entities carry on business activities.

In 2024, deferred tax expense is primarily influenced by changes in temporary differences between the carrying value and tax value of tangible assets and provisions, as well as by the increase in the tax rate applied to the calculation of deferred tax for certain Slovakian entities subject to a special levy.

Change in tax rates effective from 1 January 2024

The change of corporate income tax rate from 24% to 23% in Austria, from 19% to 21% in Czech Republic and from 19% to 22% in Slovenia from 1 January 2024 were taken into account during the preparation of the financial statements.

c) Deferred tax assets and liabilities

The deferred tax balances as of 31 December 2024 and 31 December 2023 in the consolidated statement of financial position consist of the following items by categories:

	2024	2023
	HUF million	HUF million
Property, plant and equipment and intangible assets	(129,010)	(66,926)
Statutory tax losses carried forward	24,844	18,278
Provisions	103,108	89,261
Elimination of intragroup transactions	32,538	32,940
Other temporary differences *	(73,774)	(85,497)
Income tax expense attributable to profit from continuing operation	**(42,294)**	**(11,944)**
of which:		
Total deferred tax assets	135,262	135,123
Total deferred tax liabilities	(177,556)	(147,067)

* Deferred tax on other temporary differences includes items such as receivables write-off, inventory valuation differences, valuation of financial instruments and foreign exchange differences.

Out of the total HUF 135,262 million deferred tax assets HUF 75,190 million at MOL Plc. and HUF 10,057 million at INA relates to timing differences of provisions. Besides that, HUF 30,022 million relates to temporary differences on intangible and tangible assets at INA. Additionally, HUF 21,782 million relates to deferred tax on tax lossess carried forward at MOL Plc.

Total deferred tax liabilities of HUF 177,556 million include temporary differences on intangible and tangible assets at Slovnaft (HUF 78,837 million), MOL Azerbaijan (HUF 24,978 million) and FGSZ (HUF 16,358 million). Deferred tax liabilities also include HUF 34,345 million (MOL Azerbaijan) and HUF 15,792 million (INA) impact of fair value adjustment of tangible assets recognised upon acquisition.

Analysis of movements during the year in the net deferred tax liability:

	2024 HUF million	**2023** HUF million
Net deferred tax asset/(liability) as at 1 January	**(11,944)**	(18,583)
Acquisition of business	(3,014)	(20,536)
Recognised in statement of profit or loss from continuing operation	(22,737)	33,852
Recognised directly in equity (as other comprehensive income)	4,332	(9,237)
Sale of business	-	(399)
Other	(8,931)	2,959
Net deferred tax asset/(liability) at 31 December	**(42,294)**	**(11,944)**

The amount recognised in the statement of profit or loss as a deferred tax expense is mainly driven by changes related to Slovnaft (HUF 22,077 million) and MOL Plc. (HUF 5,262 million) offset by MOL Polska (HUF 4,270 million benefit)

Change in tax rates effective from 1 January 2025

The increase in the corporate income tax rate to 24% effective from 1 January 2025, along with the increase in special levy in Slovakia, was taken into account in the Group's deferred tax calculation. In accordance with IAS 12, enacted and substantively enacted tax rate changes must be considered when measuring deferred tax assets and liabilities, and these adjustments have been reflected accordingly.

d) Reconciliation of taxation rate

A numerical reconciliation between tax expense and the product of accounting profit multiplied by the applicable tax rates is as follows.

The table below provides a reconciliation of the Hungarian corporate tax charge to the actual consolidated tax charge. As the Group is operating in multiple countries, the actual tax rates applicable to profits in those countries are different from the Hungarian tax rate. The impact is shown in the table below as differences in tax rates.

	2024 HUF million	**2023** HUF million
Profit before tax per consolidated statement of profit or loss from continuing operation	**542,303**	**691,418**
Profit before tax per consolidated statement of profit or loss from discontinued operation	**(40,893)**	**(449)**
Profit before tax per consolidated statement of profit or loss	**501,410**	**690,969**
Less: share of profit of joint ventures and associates	(24,347)	(1,317)
Income before taxation and share of profit of joint ventures and associates	**477,063**	**689,652**
Tax expense at the applicable tax rate (9%)	42,936	62,069
Change in recognition of prior year tax losses carried forward	4,362	6,006
Current year losses not recognised as deferred tax asset	7,883	2,328
Differences in tax rates at subsidiaries	28,670	21,015
Other tax expenses (local trade tax, extra profit tax, industry tax)	48,234	38,205
Non-taxable income	(3,562)	(1,665)
Tax allowance available	(72)	(76)
Permanent differences (tax value - IFRS value)	15,483	(4,433)
Effect of tax audits	1,666	65
Total income tax expense for the year	**145,600**	**123,514**
Income tax expense reported in the statement of profit or loss	**145,600**	**123,514**
Income tax attributable to discontinued operation	**-**	**-**
Effective tax rate	**29%**	**18%**

e) Income tax recognised in other comprehensive income

The amount of income tax relating to each component of other comprehensive income:

	2024 HUF million	2023 HUF million
Net gain/(loss) on hedge of a net investment	5,855	(7,630)
Revaluations of debt instruments at fair value through other comprehensive income	229	(1,530)
Revaluations of equity instruments at fair value through other comprehensive income	(1,281)	(466)
Revaluations of financial instruments treated as cash flow hedges	(543)	78
Equity recorded for actuarial gain/(loss) on provision for retirement benefit obligation	72	311
Total income tax recognised in other comprehensive income	**4,332**	**(9,237)**

f) Unrecognised deferred tax assets

The following deferred tax assets have not been recognised in respect of tax losses and other temporary differences in the Group due to losses in companies whose ability to generate profits is uncertain:

	2024 HUF million	2023 HUF million
Tax losses - indefinite expiry	46,462	41,099
Tax losses - expiry within 5 years	69,937	73,490
Tax losses - expiry after 5 years	257	288
Other temporary differences	4,039	6,350
Total unrecognised deferred tax asset	**120,695**	121,227

Other line include HUF 3,860 million unrecognised deferred tax asset for temporary differences arising from investments in subsidiaries, branches and associates, and interests in joint arrangements.

Unrecognised deferred tax liability for all taxable temporary differences associated with investments in subsidiaries, branches and associates, and interests in joint arrangements is HUF 13,527 million.

g) Pillar Two global minimum tax

On 20 December 2021, the Organisation for Economic Co-operation and Development (OECD) released the Pillar Two Model Rules. The Pillar Two Model Rules aim to establish a minimum effective tax rate for large multinational enterprises on the income generated in the countries where they operate. Under the legislation, the Group is liable to pay a top-up tax for the difference between its GloBE effective tax rate in each jurisdiction and the 15% minimum rate.

Under the rules, transitional CbCR Safe Harbor rules may apply. These are temporary measures that allow multinational enterprises to avoid undertaking detailed GloBE rule based calculations if they can demonstrate, based on their CbCR data, that they meet one of the following tests for a jurisdiction: (i) revenue and income below the de minimis threshold; (ii) an ETR that equals or exceeds an agreed rate; or (iii) no excess profits after excluding routine profits.

With the exception of five countries, all jurisdictions where the Group operates are covered by the transitional CbCR safe harbours. These five countries are Bosnia and Herzegovina, Croatia, Egypt, Ireland and Serbia, which countries fall under the detailed GloBE calculation. Based on the detailed calculation the GloBE effective tax rate is above 15% in Croatia, Egypt and Serbia, while it is under 15% in Bosnia and Herzegovina and Ireland.

In Bosnia and Herzegovina the ETR is 8.63% after 2024, that results in a top-up tax of 6.37%. Additionally, in Bosnia and Herzegovina the Group had available substance-based income exclusion amount that further reduces the excess profit of the country after which HUF 112 million top-up tax has been determined. In Ireland, the Group had an ETR of 12.5%, that resulted in a 2.5% top-up tax in the amount of HUF 32 million. The Group's total current tax expense related to Pillar Two income taxes is HUF 145 million.

In accordance with paragraph 4A of IAS 12 the Group applies the temporary exception and neither recognise nor disclose information about deferred tax assets and liabilities related to Pillar Two income taxes.

12. Components of other comprehensive income

Exchange differences on translating foreign operations

Accounting policies

The difference on translating consolidated foreign operations which functional currency is different from the presentation currency of the Group are recognised in other comprehensive income and cumulated in a separate component of equity until disposal or liquidation of the foreign operation when they become part of the gain or loss on disposal. These exchange differences are not recognised in profit or loss because the changes in exchange rates have little or no direct effect on the present and future cash flows from operations. When a subsidiary that is a foreign operation repays a quasi-equity loan or returns share capital there is a reduction in the parent's absolute ownership interest, the pro rata share of the CTA should be reclassified to profit and loss.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	251,402	(149,650)
Recycling reserves from OCI to profit or loss due to disposal	(443)	3,708
Exchange differences on translating continuing foreign operations, net of tax	**250,959**	**(145,942)**

Translation reserve has increased compared to the previous year due to HUF weakening against EUR and USD.

Net investment hedge

Accounting policies

Exchange differences on translating foreign operations are recognised in other comprehensive income and the net assets of foreign operations may be designated as hedged items in net investment hedge. The foreign exchange gains or losses on the debts designated as hedging instruments are transferred from finance result to other comprehensive income, until the foreign operation is disposed of or liquidated, when such gains or losses become part of the gain or loss on disposal.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	(25,412)	26,256
Income tax effect	5,855	(7,630)
Net investment hedge, net of tax	(19,557)	18,626

Changes in fair value of debt instruments at fair value through other comprehensive income

Accounting policies

Debt instruments which are held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets are measured at fair value through other comprehensive income. When the asset is derecognised or reclassified, changes in fair value previously recognised in other comprehensive income and accumulated in equity are reclassified to profit and loss.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	(759)	5,648
Income tax effect	229	(1,530)
Changes in fair value of debt instruments at fair value through other comprehensive income, net of tax	**(530)**	**4,118**

Changes in fair value of equity instruments at fair value through other comprehensive income

Accounting policies

If an equity investment is not held for trading, an irrevocable election can be made at initial recognition to measure it at fair value through other comprehensive income. When the asset is derecognised changes in fair value previously recognised in other comprehensive income and accumulated in equity remain in other comprehensive income.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	13,309	17,806
Income tax effect	(1,281)	(466)
Changes in fair value of equity instruments at fair value through other comprehensive income, net of tax	**12,028**	**17,340**

Changes in fair value of cash flow hedges

Accounting policies

Cash flow hedges are hedges of the exposure to variability in cash flows that is attributable to a particular risk associated with a recognised asset or liability or a highly probable forecast transaction that could affect the statement of profit or loss. The effective portion of the gain or loss on the hedging instrument is recognised directly as other comprehensive income.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	(138)	(865)
Income tax effect	(543)	78
Changes in fair value of cash flow hedges, net of tax	**(681)**	**(787)**

Remeasurement of post-employment benefit obligations

Accounting policies

The effects of differences between the previous actuarial assumptions and what has actually occurred and the effects of changes in actuarial assumptions in the model used for determining provision for post-employment benefit obligations, called actuarial gains and losses, are recognised in the other comprehensive income immediately. The recognised amount is not reclassified to profit or loss in subsequent periods.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	25	(2,664)
Recycling reserves from OCI to profit or loss due to disposal	-	(117)
Income tax effect	72	311
Remeasurement of post-employment benefit obligations	**97**	**(2,470)**

Share of other comprehensive income of associates and joint ventures

Accounting policies

The other comprehensive income includes the Group's share of the associates and joint ventures' other comprehensive income. When the associate or joint ventures are disposed of or their consolidation with equity method is discontinued all amounts in other comprehensive income in relation to that investment is derecognised.

	2024 HUF million	2023 HUF million
Gains/(losses) arising during the year	13,200	(13,125)
Share of other comprehensive income of associates and joint ventures	13,200	(13,125)

NON-FINANCIAL ASSETS AND LIABILITIES

This section describes those non-financial assets that are used, and liabilities incurred to generate the Group's performance. This section also provides detailed disclosures on the significant exploration and evaluation related matters as well as the Group's recent acquisitions and disposals.

13. Property, plant and equipment, investment property and intangible assets

a) Property, plant and equipment

Accounting policies

Property, plant and equipment are stated at cost less accumulated depreciation, depletion and accumulated impairment loss. For investment properties, the cost model is applied by MOL Group.

The initial cost of property, plant and equipment comprises its purchase price, including import duties and non-refundable purchase taxes and any directly attributable costs of bringing the asset to its working condition and location for its intended use, such as borrowing costs. Estimated field abandonment and site restoration costs are capitalised upon initial recognition or subsequently, when there is a direct or indirect legal obligation and/or constructive obligation to do so. Expenditures incurred after the property, plant and equipment have been put into operation are charged to statement of profit or loss in the period in which the costs are incurred, except for periodic maintenance costs which are capitalised as a separate component of the related assets.

Construction in progress represents plant and properties under construction and is stated at cost without being depreciated. Construction in progress is reviewed for impairment annually.

	Land and HUF million	Machinery and HUF million	Other machinery HUF million	Construction in HUF million	**Total HUF million**
At 1 Jan 2023					
Gross book value	5,802,963	3,574,108	498,171	898,922	**10,774,164**
Accumulated depreciation and	(3,809,741)	(2,811,980)	(286,936)	(19,932)	**(6,928,589)**
Net book value	**1,993,222**	**762,128**	**211,235**	**878,990**	**3,845,575**
From this net value of assets held for	*(22,659)*	*(2,565)*	*(975)*	*(1,497)*	***(27,696)***
					3,817,879
Net book value - at 1 Jan 2023	**1,993,222**	**762,128**	**211,235**	**878,990**	**3,845,575**
Additions and capitalisations	163,785	163,849	54,538	147,214	**529,386**
Acquisition of subsidiaries	107,118	42,018	21,868	1,659	**172,663**
Depreciation for the year	(191,421)	(140,743)	(41,591)	-	**(373,755)**
Impairment	(27,928)	(1,171)	(292)	(4,142)	**(33,533)**
Reversal of impairment	5,277	503	70	-	**5,850**
Disposals	(19,186)	(4,398)	(3,420)	(665)	**(27,669)**
Disposal of subsidiaries	-	-	-	-	**0**
Exchange differences	(65,034)	(18,694)	(585)	(18,971)	**(103,284)**
Transfers and other movements	8,112	(12,606)	(527)	(3,483)	**(8,504)**
Closing net book value	**1,973,945**	**790,886**	**241,296**	**1,000,602**	**4,006,729**
At 31 Dec 2023					
Gross book value	5,708,367	3,594,515	552,014	1,018,691	**10,873,587**
Accumulated depreciation and	(3,734,422)	(2,803,629)	(310,718)	(18,089)	**(6,866,858)**
Net book value	**1,973,945**	**790,886**	**241,296**	**1,000,602**	**4,006,729**
From this net value of assets held for	*(7,540)*	*(829)*	*(559)*	-	***(8,928)***
					3,997,801
Net book value - at 1 Jan 2024	**1,973,945**	**790,886**	**241,296**	**1,000,602**	**4,006,729**
Additions and capitalisations	556,318	443,609	94,781	(334,728)	**759,980**
Acquisition of subsidiaries	43,496	111,005	2,389	6,328	**163,218**
Depreciation for the year	(235,036)	(165,986)	(48,154)	0	**(449,176)**
Impairment	(28,743)	(5,107)	(189)	(5,836)	**(39,875)**
Reversal of impairment	8,348	3,836	46	35	**12,265**
Disposals	(7,855)	(1,076)	(3,931)	(271)	**(13,133)**
Disposal of subsidiaries	0	0	(5)	0	**(5)**
Exchange differences	122,585	32,469	9,380	28,298	**192,732**
Transfers and other movements	11,877	(814)	(1,666)	(8,055)	**1,342**
Closing net book value	**2,444,935**	**1,208,822**	**293,947**	**686,373**	**4,634,077**
At 31 Dec 2024					
Gross book value	6,664,407	4,246,996	651,170	703,638	**12,266,211**
Accumulated depreciation and	(4,219,472)	(3,038,174)	(357,223)	(17,265)	**(7,632,134)**
Net book value	**2,444,935**	**1,208,822**	**293,947**	**686,373**	**4,634,077**
From this net value of assets held for	*(674)*	*(632)*	-	-	***(1,306)***
					4,632,771

Acquisition of a PET recycling facility

MOL Group signed an agreement on 17 January 2024 to acquire a PET recycling facility. The transaction was closed on 2 September 2024.

Acquisition of a rubber waste recycling plant

MOL Group signed an agreement on 21 March 2024 to acquire a planned rubber waste recycling plant. The transaction was closed on 2 October 2024.

Acquisition of a 66 MWp photovoltaic plant in Hungary

MOL entered into a sales and purchase agreement with Optimum Vogt Ltd., a subsidiary of Ib vogt Gmbh, to acquire 100% of Naperőmű Farm Ltd. on 18 December 2024.
The sole activity of Naperőmű Farm Ltd. is to oversee the construction of a 66 MWp photovoltaic plant in Ballószög, Hungary. Construction works are finished, and trial runs are expected to start in January 2025.
A key area of MOL strategy is to expand in renewables to cover an increasing portion of our growing electricity demand. The acquisition of photovoltaic assets in Ballószög and ongoing organic developments will raise MOL's renewable capacities close to 200 MWp. It contributes to a higher share of renewables in MOL's energy mix and the reduction of its carbon footprint.

Leased assets

Accounting policies

The Group recognises the right-of-use assets and lease liabilities for most leases.

The Group measures the right-of-use asset at cost, less accumulated depreciation and any accumulated impairment losses. Capitalised leased assets are depreciated over the shorter of the estimated useful life of the asset or the lease term. The lease liability is initially measured at the present value of the lease payments payable over the lease term, discounted at the rate implicit in the lease if that can be readily determined, otherwise the Group as lessee applies incremental borrowing rate. The lease liability is measured subsequently using the effective interest rate method.

The Group has elected not to recognise right-of-use assets and lease liabilities for some leases of low-value assets and short-term leases. Low-value assets mainly comprise those assets which value, when new, do not exceed USD 5,000. Short-term leases are leases with a lease term of 12 months or less. The Group recognises the lease payments associated with these leases as expense on a straight-line basis over the lease term.

The Group presents right-of-use assets from leases in 'Property, plant and equipment', the same line item as it presents underlying assets of the same nature that it owns.

Significant accounting estimates and judgements

The Group has applied judgement to determine the lease term for some lease contracts that include renewal or termination options. The assessment of whether the Group is reasonably certain to exercise such options impacts the lease term, which significantly affects the amount of lease liabilities and leased assets recognised.

	Rights	Land and building and related rights	Machinery and equipment	Other machinery and equipment	**Total**
	HUF million	HUF million	HUF million	HUF million	**HUF million**
At 31 Dec 2023					
Net book value of leased assets	**36**	**142,931**	**42,108**	**19,685**	**204,760**
Period ended 31 Dec 2024					
Additions and capitalisations	58	53,542	5,192	4,869	63,661
Depreciation for the period	(26)	(17,297)	(12,339)	(6,126)	(35,788)
Impairment, termination	-	(141)	(29)	(6)	(176)
Closing net book value	**68**	**179,035**	**34,932**	**18,422**	**232,457**

The leased assets include land and building related leases (office, land etc), machinery leases that are connected to assets used in the production (e.g. railway wagons), vehicle leases and other office equipment related leases.

MOL Group has presented lease liabilities within loans and borrowings, please refer to Note 20/c, for the interest paid and received on leasing agreements please refer to Note 5.

Borrowing costs

Accounting policies

Borrowing costs (including interest charges and other costs incurred in connection with the borrowing of funds, including exchange differences arising from foreign currency borrowings) directly attributable to the acquisition, construction or production of qualified assets are capitalised until these assets are substantially ready for their intended use or sale. All other costs of borrowing are expensed in the period in which they are incurred.

Property, plant and equipment include borrowing costs incurred in connection with the construction of qualifying assets. Additions to the gross book value of property, plant and equipment include borrowing costs of HUF 31,176 million in 2024 (2023: HUF 16,252 million). In 2024 the applicable capitalisation rate (including the impact of foreign exchange differences) has been 5.01% (2023: 3.64%).

Government grants

Accounting policies

Government grants are recognised at their fair value where there is reasonable assurance that the grant will be received, and all attaching conditions will be complied with. Where the grant relates to an asset, the fair value is credited to a deferred income account and is released to the statement of profit or loss over the expected useful life of the relevant asset. Grant relates to interest expense deducted in reporting the related expense and the borrowings also netted with the deferred income.

In 2024 property, plant and equipment includes assets with a value of HUF 28,987 million (2023: HUF 24,570 million) financed from government grants. The total amount reflects mainly the government grant received for the construction of the new polyol plant in MOL Petrochemicals which is HUF 11,554 million as of 31 December 2024 (31 December 2023: HUF 11,683 million). Further significant amounts are the assets of FGSZ Plc. partly financed via a European Union grant for the construction of the Hungarian-Romanian and the Hungarian-Croatian natural gas interconnector and transformation of nodes, and the assets of Slovnaft a.s financed by the grant received from Slovakian government in order to serve State Authorities in case of state emergencies.

	2024 HUF million	2023 HUF million
At 1 January	**24,570**	**25,146**
Asset related government grants received	5,875	1,650
Release of deferred grants	(1,848)	(1,945)
Foreign exchange differences	390	(281)
At 31 December 2024 (see Note 17 and 18)	**28,987**	**24,570**

Non-current assets pledged as security

The carrying amount of non-currents assets pledged as security for liabilities is HUF 85,156 million as of 31 December 2024 (2023: HUF 61,107 million) which relates to the MOL Fleet Solution Flottakezelő Ltd. and the ITK Group.

b) Investment property

Accounting policies

Investment property is a property (land or a building or part of a building or both) held to earn rentals or for capital appreciation or both, rather than for:
- use in the production or supply of goods or services or for administrative purposes, or
- sale in the ordinary course of business.

For investment properties, the cost model is applied by MOL Group. Transfer to, or from, investment property shall be examined when there is an evident change in use.

Investment properties include real estates held by MOL Group to earn rental income from long-term operating leases or for capital appreciation. Investment properties are initially measured at cost and the Group applies the cost model for the subsequent measurement of these assets. The Group accounts for depreciation assuming 10-50 years useful life and applies the straight-line method for measuring depreciation.

The amount recognised in the consolidated statement of profit or loss for 2024 for investment property is HUF 1,349 million operating expense and HUF 3,582 million HUF rental income.The following table provides a reconciliation of the carrying amount of investment property at the beginning and end of the period:

	2024 HUF million	2023 HUF million
Opening gross carrying amount	**82,390**	**30,868**
Opening accumulated depreciation	**(66,431)**	**(21,409)**
Opening carrying amount	**15,959**	**9,459**
Addition from acquisitions	56	55
Depreciation	(734)	(839)
Exchange differences	1,018	(298)
Transfer to / from tangible fixed assets (net value)	1,967	7,914
Other changes (net value)	346	(332)
Closing gross carrying amount	**93,759**	**82,390**
Closing accumulated depreciation	**(75,147)**	**(66,431)**
Closing carrying amount	**18,612**	**15,959**

The fair value of investment property is HUF 90,461 million as of 31 December 2024. The valuation was performed by the Group's own valuation experts using DCF valuation method.

There are no contractual obligations to purchase, construct, or develop or for repairs, maintenance or enhancements of the Group’s investment property and there are no restrictions on the realisability of it as of 31 December 2024.

c) Intangible assets

Accounting policies

An intangible asset is recognised initially at cost. For intangible assets acquired in a business combination, the cost is the fair value at the acquisition date.

Following initial recognition, intangible assets, other than goodwill are stated at the amount initially recognised, less accumulated amortisation and accumulated impairment losses.

Intangible assets, excluding development costs, created within the business are not capitalised.

Development costs are capitalised if the recognition criteria according to IAS 38 are fulfilled. Costs in development stage can be not amortised. The carrying value of development costs is reviewed for impairment annually when the asset is not yet in use or more frequently when an indicator of impairment arises during the reporting year indicating that the carrying value may not be recoverable.

Free granted quotas are not recorded in the financial statements, while purchased emission quotas are initially recorded as intangible assets at cost less impairment, if any, taking into consideration the residual value. The quotas recognised are not amortised if the residual value is at least equal to carrying value.

	Rights	Software and other intellectual property	Exploration and evaluation assets	Goodwill	**Total**
	HUF million	HUF million	HUF million	HUF million	**HUF million**
At 1 Jan 2023					
Gross book value	320,839	106,734	280,794	293,661	**1,002,028**
Accumulated amortisation and impairment	(160,355)	(71,163)	(149,071)	(68,361)	**(448,950)**
Net book value	**160,484**	**35,571**	**131,723**	**225,300**	**553,078**
From this net value of assets held for sale	-	*(4)*	-	*(486)*	***(490)***
					552,588
Net book value - at 1 Jan 2023	**160,484**	**35,571**	**131,723**	**225,300**	**553,078**
Additions	120,518	16,640	12,407	-	**149,565**
Acquisition of subsidiary	4,619	129	1	27,137	**31,886**
Amortisation for the year	(13,618)	(7,857)	(1,583)	(30)	**(23,088)**
Impairment	(505)	(211)	(3,723)	(43,240)	**(47,679)**
Reversal of impairment	-	-	1,360	-	**1,360**
Disposals	(95,067)	(5)	-	-	**(95,072)**
Disposal of subsidiaries	-	-	-	-	**-**
Exchange differences	(8,537)	(413)	(6,452)	(11,508)	**(26,910)**
Transfers and other movements	6,561	(9,940)	(13,676)	(30)	**(17,085)**
Closing net book value	**174,455**	**33,914**	**120,057**	**197,629**	**526,055**
At 31 Dec 2023					
Gross book value	341,179	110,583	204,850	308,674	**965,286**
Accumulated amortisation and impairment	(166,724)	(76,669)	(84,793)	(111,045)	**(439,231)**
Net book value	**174,455**	**33,914**	**120,057**	**197,629**	**526,055**
From this net value of assets held for sale	-	-	-	*(486)*	***(486)***
					525,569
Net book value - at 1 Jan 2024	**174,455**	**33,914**	**120,057**	**197,629**	**526,055**
Additions	120,503	17,631	16,584	-	**154,718**
Acquisition of subsidiary	4,345	56	1	7,313	**11,715**
Amortisation for the year	(17,509)	(7,333)	(359)	-	**(25,201)**
Impairment	(1,287)	(286)	(2,115)	(33)	**(3,721)**
Reversal of impairment	-	-	-	-	**-**
Disposals	(180,931)	-	-	(486)	**(181,417)**
Disposal of subsidiaries	(1)	-	-	-	**(1)**
Exchange differences	13,051	565	11,052	21,620	**46,288**
Transfers and other movements	8,900	81	(19,977)	-	**(10,996)**
Closing net book value	**121,526**	**44,628**	**125,243**	**226,043**	**517,440**
At 31 Dec 2024					
Gross book value	297,637	129,840	207,696	345,261	**980,434**
Accumulated amortisation and impairment	(176,111)	(85,212)	(82,453)	(119,218)	**(462,994)**
Net book value	**121,526**	**44,628**	**125,243**	**226,043**	**517,440**
From this net value of assets held for sale	-	-	-		***-***
					517,440

Goodwill

Accounting policies

Goodwill should be initially measured as of the acquisition date at its cost, being the excess of the cost of the business combination plus any non-controlling interest and the acquisition date fair value of previously held equity interest in the acquiree over the net fair value of the identifiable assets, liabilities and contingent liabilities. As the excess of (a) over (b) below:

a) the aggregate of:
- the consideration transferred measured in accordance with IFRS 3, which generally requires acquisition-date fair value;
- the amount of any non-controlling interest in the acquiree measured in accordance with IFRS 3; and
- in a business combination achieved in stages, the acquisition-date fair value of the acquirer's previously held equity interest in the acquiree.

b) the net of the acquisition-date amounts of the identifiable assets acquired and the liabilities assumed measured in accordance with IFRS 3.

Following initial recognition, goodwill is measured at cost less any accumulated impairment losses. For the purpose of impairment testing, goodwill acquired in a business combination is, from the acquisition date, allocated to each of the Group's cash generating units, or groups of cash generating units, that are expected to benefit from the synergies of the combination, irrespective of whether other assets or liabilities of the Group are assigned to those units or groups of units.

Goodwill acquired in a business combination is allocated, at acquisition, to the cash generating units (CGUs) that are expected to benefit from that business combination. Before recognition of impairment losses, the carrying amount of goodwill has been allocated as follows:

Goodwill (net book value)	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Upstream	**137,152**	**120,719**
ACG field	137,152	120,719
Consumer services	**75,206**	**63,377**
Slovenian network (please refer to note 10)	23,368	14,303
Polish retail network (please refer to note 10)	-	-
Croatian retail network	20,245	18,897
Czech retail network	9,615	9,131
Hungarian retail network	7,972	7,972
Slovak retail network	8,594	8,021
Romanian retail network	5,412	5,053
Downstream	**12,653**	**11,843**
Austrian wholesale and logistic	10,435	9,741
German plastic compounder	1,741	1,625
MOL Petrochemicals	477	477
Corporate	**1,032**	**1,204**
Croatian oil field services	1,032	964
Other production facilities	-	240
Total goodwill	**226,043**	**197,143**

Oil and natural gas exploration and development expenditures

Accounting policies

Oil and natural gas exploration and development expenditure is accounted for using the Successful Efforts method of accounting.

License and property acquisition costs

Costs of exploration and property rights are capitalised as intangible assets and amortised on a straight-line basis over the estimated period of exploration. Each property is reviewed on an annual basis to confirm that drilling activity is planned, and it is not impaired. If no future activity is planned, the remaining balance of the licence and property acquisition costs is written off. Upon recognition of proved reserves ('proved reserves' or 'commercial reserves') and internal approval for development, the relevant expenditure is transferred to property, plant and equipment.

Exploration expenditure

Geological and geophysical exploration costs are charged against income statement as incurred. Costs directly associated with an exploration well are capitalised as an intangible asset until the drilling of the well is complete and the results have been evaluated. These costs include employee remuneration, materials and fuel used, rig costs, delay rentals and payments made to contractors. If hydrocarbons are not found, the exploration expenditure is written off as a dry-hole. If hydrocarbons are found and, subject to further appraisal activity, which may include the drilling of further wells (exploration or exploratory-type stratigraphic test wells), are likely to be capable of commercial development, the costs continue to be carried as an asset. All such carried costs are subject to technical, commercial and management review at least once a year to confirm the continued intent to develop or otherwise extract value from the discovery. When this is no longer the case, the costs are written off. When proved reserves of oil and natural gas are determined and development is sanctioned, the relevant expenditure is transferred to property, plant and equipment.

Development expenditure

Expenditure on the construction, installation or completion of infrastructure facilities such as platforms and the drilling of development wells, including unsuccessful development or delineation wells, is capitalised within property, plant and equipment.

Significant accounting estimates and judgements

Application of Successful Efforts method of accounting for exploration and evaluation assets

Management uses judgement when capitalised exploration and evaluation assets are reviewed to determine capability and continuing intent of further development.

Exploration and evaluation assets

Transfers from exploration and evaluation assets represent expenditures which, upon determination of proved reserves of oil and natural gas are reclassified to property, plant and equipment.

Within exploration and evaluation assets, exploration expenses incurred in 2024 is HUF 5,150 million (2023: HUF 2,640 million), which were not eligible for capitalisation. Consistent with the Successful Efforts method of accounting they were charged to various operating cost captions of the consolidated statement of profit or loss as incurred.

Other research and development costs are less significant compared to exploration expenses. These research and development costs are HUF 1,058 million in 2024 (2023: HUF 1,228 million).

Write-offs of dry-holes

	2024 HUF million	2023 HUF million
Hungary	-	-
Croatia	275	2,600
Pakistan	903	17
Egypt	511	247
Total	**1,689**	**2,864**

Halini 2 well in Karak JV was plugged and closed in Pakistan in 2024. Ras Qattara in Egypt, Drava 03 and Lipovljani field in Croatia were classified as dry in 2024.

Obradovci-1J well, Mikleus-1 well, Kozarice-43 well and Lipovljani-179 well in Croatia, and Ras Qatata in Egypt were drilled in 2023, the wells did not achieve the objectives and have been classified as dry.

1. Depreciation, depletion and amortisation

Accounting policies

Depreciation of assets begin when the relevant asset is available for use. Depreciation of each component of an intangible asset, property, plant and equipment and investment property, except for given Upstream assets, is computed on a straight-line basis over their respective useful lives. Usual periods of useful lives for different types of assets are as follows:

- Software: 3 – 5 years
- Buildings: 10 – 50 years
- Refineries and chemicals manufacturing plants: 4 –12 years
- Gas and oil storage and transmission equipment: 7 – 50 years
- Petrol service stations: 5 – 30 years
- Telecommunication and automatization equipment: 3 – 10 years

In Upstream segment depletion and depreciation of production installations and transport systems for oil and gas is calculated for each individual field or field-dedicated transport system using the unit of production method, based on proved and developed commercially recoverable reserves. Recoverable reserves are reviewed on an annual basis prospectively. Transport systems used by several fields and other assets are calculated on the basis of the expected useful life, using the straight-line method. Amortisation of leasehold improvements is provided using the straight-line method over the term of the respective lease or the useful life of the asset, whichever period is less. Periodic maintenance costs are depreciated until the next similar maintenance takes place.

The useful lives of intangible assets are assessed to be either finite or indefinite. Amortisation is charged on assets with a finite useful life over the best estimate of their useful lives using the straight-line method.

The useful life and depreciation methods are reviewed at least annually. All the following factors must be considered in determining the useful life of an asset:

- expected usage of the asset. Usage is assessed by reference to the asset's expected capacity or physical output;

- the expected physical wear-and-tear that depends on operation factors like the number of shifts, the repair and maintenance programme employed at the enterprise as well as the repair and maintenance done when the asset is out of use;

- technical obsoleteness due to changes and developments of the production process or changes in the market demands for the products that the assets can produce or for the services that the assets can provide;

- legal or other types of restrictions on the use of the asset, for example the expiry date of the related lease transactions.

Significant accounting estimates and judgements

The determination of the Group's estimated oil and natural gas reserves requires significant judgements and estimates to be applied and these are yearly reviewed and updated. Numerous factors have an impact on determination of the Group's estimates of its oil and natural gas reserves (e.g. geological and engineering data, reservoir performance, acquisition and divestment activity, drilling of new wells, and commodity prices). MOL Group bases its proved and developed reserves estimates on the requirement of reasonable certainty with rigorous technical and commercial assessments based on conventional industry practice and regulatory requirements. Oil and natural gas reserve data are used to calculate depreciation, depletion and amortisation charges for the Group's oil and gas properties. The impact of changes in these estimations is handled prospectively by amortising the remaining carrying value of the asset over the expected future production. Oil and natural gas reserves also have a direct impact on the value in use calculations applied for determination of the recoverability of assets.

2. Impairment of assets

Accounting policies

Property, plant and equipment and intangible assets are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount of an asset may not be recoverable. Whenever the carrying amount of an asset exceeds its recoverable amount, an impairment loss is recognised in the statement of profit or loss for items of property, plant and equipment and intangibles carried at cost. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. The fair value is the amount obtainable from the sale of an asset in an arm's length transaction while value in use is the present value of estimated net future cash flows expected to arise from the continuing use of an asset and from its disposal at the end of its useful life. Recoverable amounts are estimated for individual assets or, if this is not practicable, for the cash-generating unit. Intangible assets with indefinite useful life are not depreciated, instead an impairment test is performed at each financial year-end.

The Group assesses at each reporting date whether there is any indication that previously recognised impairment losses may no longer exist or may have decreased. A previously recognised impairment loss is reversed only if there has been a change in the impairment assumptions considered when the last impairment loss was recognised. The reversal is limited so that the carrying amount of the asset neither exceeds its recoverable amount, nor is higher than its carrying amount net of depreciation, had no impairment loss been recognised in prior years.

Significant accounting estimates and judgements

Impairment of non-current assets, including goodwill

The impairment calculation requires an estimate of the recoverable amount of the cash generating units. Value in use is usually determined on the basis of discounted estimated future net cash flows. In determination of cash flows the most significant variables are discount rates, terminal values, the period for which cash flow projections are made, as well as the assumptions and estimates used to determine the cash inflows and outflows, including commodity prices, operating expenses, future production profiles and the global and regional supply-demand equilibrium for crude oil, natural gas and refined products. As approved by the year-end RRC, MOL Group has upgraded its reserve estimates of matured oil and gas fields in CEE. By this all reserves are determined at 2P basis consistently with industry best practice.

Impairments

Impairment indicators

During the financial year the following impairment indicators were identified: change in crude oil and gas prices, change in the discount rates and, in Hungary change in royalty legislation.

2024 key assumptions for impairment testing (nominal terms)	2025-2027 (average)	2028-2030 (average)	2031	2040	2050
Brent oil price (USD/bbl)	85	80	82	90	90
TTF Gas price (EUR/MWh)	30	39	43	43	35
CO2 price EUA (EUR/t)	80	110	126	194	197
MOL Group refinery margin (USD/bbl)	5.00	2.82	2.25	0.86	1.81
MOL Group petrochemical margin (EUR/t)	250	430	471	446	585

2023 key assumptions for impairment testing (nominal terms)	2024-2026 (average)	2027-2029 (average)	2030	2040	2050
Brent oil price (USD/bbl)	80	78	80	89	89
TTF Gas price (EUR/MWh)	50	42	41	42	34
CO2 price EUA (EUR/t)	100	116	121	175	174
MOL Group refinery margin (USD/bbl)	3.51	1.64	1.02	(0.05)	0.36
MOL Group petrochemical margin (EUR/t)	301	427	466	462	590

Significant assumptions

The price and margin assumptions used in impairment testing are reviewed annually and approved by management. They are based on management's best estimate and were consistent with external sources. Prices in the near term are based on recent forward prices and market developments, long-term price assumptions are developed considering long-term views of global supply and demand including analysis of industry experts. Long-term assumptions take into consideration the impacts of the climate change.

Brent prices beyond the planning horizon are modelled by matching the global oil cost curve with the in-house global oil demand projection. TTF natural gas prices beyond the planning horizon are set to be in line with the average break-even price of new global LNG projects (based on IEA). CO2 quota prices beyond the planning horizon are modelled by the projected ETS EUA demand-supply balance capped by the projected breakeven prices of green Hydrogen projects.
MOL Group's current strategy includes 'green' targets aligned with global trends in decarbonisation. MOL Group has included the required capital expenditures for decarbonization in the cash flows for the CGU's to achieve its strategic goal of climate neutrality by 2050, and, in line with the announced strategy achieve -30% reduction in CO2 emission by 2030 as planned under Scope 1+2.

Calculation method of the applied discount rates

The discount rate represents the expectation of external parties about climate change. The discount rate used for valuations takes into account the weighted average cost of equity and net borrowings. The cost of equity is calculated using the capital asset pricing model (CAPM), which describes the relationship between market risk and the expected returns. The beta value expresses the volatility and market risk of a stock relative to a market index. The beta value in each segment is determined on the regresses the stock market returns of each company of the peer group to the return of the market index. After taking the simple average of the betas to determine the segment beta, it is adjusted for the leverage and associated tax shield effect using ratios specific to MOL Group. The discount rate used for valuations takes into account the risk of climate change through the industry beta values. The MSCI ESG scores of each company in the peer group, were collected and compared to MOL's one. As MOL has similar MSCI ESG score as the average one of its peer group, there is no need to adjust the MOL specific beta. The Group-WACC is then adjusted by the country specific risk factors to get country-by-country discount rate.

In 2024, the following significant impairment losses and impairment reversals were recognised. Impairment losses are positive, reversals are negative figures.

Impairments and write-offs (without dry-holes) - 2024*	Upstream HUF million	Downstream HUF million	Consumer services HUF million	Circular Economy HUF million	Corporate and other HUF million	Midstream HUF million	Total HUF million
Hungary	14,631	5,985	288	50	2,777	130	23,861
Poland	-	-	-	-	-	-	-
Croatia	5,286	264	67	-	(752)	-	4,865
Pakistan	-	-	-	-	-	-	-
Slovakia	-	1,023	(224)	-	(62)	-	737
Other	(28)	70	130	-	7	-	179
Total	**19,889**	**7,342**	**261**	**50**	**1,970**	**130**	**29,642**

*Including the intersegment impact

Impairments and write-offs (without dry-holes) - 2023*	Upstream HUF million	Downstream HUF million	Consumer services HUF million	Circular Economy HUF million	Corporate and other HUF million	Midstream HUF million	Total HUF million
Hungary	3,654	2,343	101	-	5,949	583	12,630
Poland	-	-	61,257	-	-	-	61,257
Croatia	345	173	903	-	(1,985)	-	(564)
Pakistan	(1,360)	-	-	-	-	-	(1,360)
Slovakia	-	215	174	-	(8)	-	381
Other	50	34	(1,290)	-	-	-	(1,206)
Total	**2,689**	**2,765**	**61,145**	**-**	**3,956**	**583**	**71,138**

*Including the intersegment impact

In 2024 and 2023 impairment was accounted in:

- Upstream segment for production fields and for assets under construction.
  - In Hungary in 2024 impairment was recorded due to
    - write off of asset under construction,
    - impairment of decommissioning assets which are not supported with sufficient NPV in Zala region,
    - impairment of the concession right in Újszilvás,
    - offset by impairment reversal in Algyő and Kelet-Tiszántúl regions due to the new royalty legislation.
  - In Croatia in 2024 impairments were recorded due to lower gas price and decommissioning cost increase, slightly offset by impairment reversals resulting from updated discount rates in onshore regions with potential reversal of previous impairment.
  - In Hungary in 2023 impairment was recorded due to
    - the return of the concession rights in Bucsa and Csanád;
    - write off of asset under construction;
    - change in the value in use for Füzesgyarmat cash generating unit.
  - In Pakistan in 2023 government approval was received for a farmout agreement for the sale of 30% share in Margala Block and accordingly 30% share of cost was reversed.
- Downstream segment mainly for unutilised refinery assets.
  - In Hungary impairment was recorded on
    - assets under construction, and
    - PE and PP recycling assets in 2024,
    - the catalysts and assets under construction in 2023.

- Consumer services mainly for machineries and equipment in filling stations.
  - In Hungary impairment was recorded on service stations out of use and on mobility assets not covered with sufficient NPV in 2024.
  - In Slovakia impairment reversal was recorded on the Slovak network in 2024.
  - In Poland impairment was recorded due to more complex dynamics in evaluation of the complex deal, and tougher market conditions on fuel availability and pricing than originally expected. From the impairment recognised on the network in 2023 HUF 37,714 million was recognised on goodwill.
  - In Croatia impairment was recorded on buildings which are not suitable for business purposes in 2023.
  - In Slovakia impairment was recorded on assets withdrawn from use and on one service station due to lower value in use in 2023.
  - Other line shows impairment reversal on the Czech network and Tifon network.
- Corporate and other segment for innovative businesses and IT equipment.
  - In Hungary impairment was accounted for asset under construction, for ITK mobility assets and for UTE intangible assets in 2024.
  - In Hungary impairment was accounted for the goodwill recognised according to IFRS 3 on the step-up acquisition of ITK Group in 2023.
  - In Croatia 2023 impairment reversal was due to a non material misstatement in depreciation calculation.

Impairment test of Upstream assets

The impairment tests were performed by MOL Group using the following assumptions:

- Recoverable amount is calculated with the assumption of using the assets in long-term in the future.
- The recoverable amount of the asset (cash-generating unit) is the value in use.
- Discount rates: the recoverable amount calculations take into account the time value of money, the risks specific to the asset and the rate of return that would be expected by a market participant for an investment with similar risk, cash flow and timing profile. It is estimated from current market transactions for similar assets or from the 'weighted average cost of capital' (WACC) of a listed entity that has a single asset or portfolio of assets that are similar in terms of service potential and risks to the asset under review.
- In assessing value in use, the estimated future cash flows are discounted to their present value using a post-tax discount rate. The pre-tax discount rate is determined by way of iteration.
- Exploration and Production segment post-tax discount rates were calculated using the WACC premise plus country risk premium of the related country. Based on the above, the post-tax discount rates used for the impairment tests in 2023 were in the range from 7.2% to 21.7%.
- The pre-tax discount rates used in 2024 ranged from 9.6% to 30.8% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- The pre-tax discount rates used in 2023 ranged from 10.2% to 29.2% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- The growth rates are based on industry growth forecasts. The Group prepares cash flow forecasts derived from the most recent financial budgets of upstream segment approved by management for financial years 2025-2027 and extrapolates cash flows for the following years based on an USD/EUR/HUF inflation rate varying between 2% and 3.5%.

Sensitivity of Upstream assets

MOL Group performed a sensitivity analysis on Upstream assets. The present values of Upstream assets were tested through the indicators for which the assets are most sensitive: Brent oil price, natural gas price and the discount rate.

Change in the present value of US assets	**Change in present value** HUF million
Brent oil price sensitivity	
-10% case	(173,580)
+10% case	156,170
Natural gas price sensitivity	
-10% case	(77,680)
+10% case	62,661
Discount rate sensitivity	
-1%point	94,402
+1%point	(99,760)

Impairment test of Downstream assets

The impairment tests performed by MOL Group were performed using the following assumptions:

- Recoverable amount is calculated with the assumption of using the assets in long-term in the future.
- The recoverable amount of the asset (cash-generating unit) is the value in use.
- Discount rates: the recoverable amount calculations take into account the time value of money, the risks specific to the asset and the rate of return that would be expected by a market participant for an investment with similar risk, cash flow and timing profile. It is estimated from current market transactions for similar assets or from the 'weighted average cost of capital' (WACC) of a listed entity that has a single asset or portfolio of assets that are similar in terms of service potential and risks to the asset under review.
- In assessing value in use, the estimated future cash flows are discounted to their present value using a post-tax discount rate. The pre-tax discount rate is determined by way of iteration.
- Downstream segment post-tax discount rates were calculated using the WACC premise plus country risk premium of the related country. Based on the above, the post-tax discount rates used for the impairment tests in 2024 were in the range from 7.0% to 9.0%.
- The pre-tax discount rates in 2024 ranged from 8.0% to 10.1% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- The pre-tax discount rates in 2023 ranged from 10.1% to 11.7% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- The growth rates are based on industry growth forecasts. The Group prepares cash flow forecasts derived from the most recent financial budgets of downstream segment approved by management for financial years 2025-2027 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 3.5%.

Sensitivity of Downstream assets

MOL Group performed a sensitivity analysis on the downstream cash generating unit comprising of two refineries and two petrochemical plants. The present value of the cash generating unit were tested through the indicators for which the CGU is most sensitive: headline margin, Brent oil price, natural gas price, Co2 quota price and the discount rate.

Change in the present value of the CGU	**Change in present value** HUF million
Headline margin sensitivity	
-1USD/bbl / -100EUR/t case	(2,455)
+1USD/bbl / +100EUR/t case	2,455
Brent oil price sensitivity	
-10% case	369
+10% case	(369)
Natural gas price sensitivity	
-10% case	371
+10% case	(371)
CO2 quota price sensitivity	
+40 EUR/t case	(1,324)
Discount rate sensitivity	
-1%point	925
+1%point	(773)

3. Impairment of goodwill

Accounting policies

Goodwill is reviewed for impairment, annually or more frequently if events or changes in circumstances indicate that the carrying value may be impaired. Impairment is determined for goodwill by assessing the recoverable amount of the cash-generating unit (or group of cash-generating units), to which the goodwill relates. Where the recoverable amount of the cash-generating unit (or group of cash-generating units) is less than the carrying amount of the cash-generating unit (or group of cash-generating units) to which goodwill has been allocated, an impairment loss is recognised. Impairment losses relating to goodwill cannot be reversed in future periods. The Group performs its annual impairment test of goodwill as at 31 December.

The Group determines the necessity of impairment of goodwill based on the recoverable amount of cash-generating units (CGUs) to which the goodwill is allocated.

The recoverable amounts of the CGUs are determined by net present value calculations of estimated future cash flows of the cash-generating units. The key assumptions for the calculation of net present values are the nominal cash flows, the growth rates during the period and the post-tax discount rates. Management considers that such post-tax rates shall be used for discounting purposes which reflect the most to the current market circumstances, the time value of money and the risks specific to the CGUs. The pre-tax discount rates are determined by way of iteration.

In MOL Group as the overall result of impairment tests performed at the end of 2023, impairment on goodwill was only recognised on the Polish retail network. An impairment of HUF 61,257 million was recognised on the network in 2023 out of which impairment recognised on goodwill was HUF 37,714 million.

No impairment was recognised on goodwill in 2024.

Upstream

In the Upstream segment Azeri-Chirag-Gunashli ("ACG") oil field is the only cash-generating unit for which goodwill is allocated.

Post-tax discount rate calculated using the weighted average cost of capital (WACC) rates and country risk premium (CRP) applied to discount the forecast cash flows reflecting risks specific to the segment for goodwill impairment calculation is 7.2%.

The value in use calculations take into account the time value of money, the risks specific to the asset and the rate of return that would be expected by market for an investment with similar risk, cash flow and timing profile.

The pre-tax discount rate is calculated by way of iteration and is 10.2%.

Impairment assessment of the assets of ACG:

- The recoverable amount of the asset (cash-generating unit) is the value in use.
- The value in use of the ACG assets is HUF 714,265 million.
- The book value of assets including goodwill is HUF 657,666 million.
- Sensitivity analysis of the key assumptions used in impairment test shows the following effects:
    - 1 percentage point increase in the post-tax discount rate indicates a decrease of HUF 48,233 million, 1 percentage point decrease results in an increase of HUF 54,326 million in the NPV.
    - 5 USD growth in oil price indicates an increase of HUF 45,675 million, 5 USD drop in oil price indicates a decrease of HUF 45,675 million in NPV.
    - +/- 1 percentage point alteration in production indicates HUF 7,858 million difference in NPV.

Downstream

In assessing recoverable amount, the estimated future cash flows are discounted to their present value using a post-tax discount rate. The pre-tax discount rate is determined by way of iteration.

Post-tax discount rates calculated using weighted average cost of capital (WACC) rates and country risk premium (CRP) applied to discount the forecast cash flows reflecting risks specific to the segment and specific to the certain countries vary 7.0% and 8.0% in current year.

Pre-tax discount rates range from 8.0% to 8.7% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.

The growth rates are based on industry growth forecasts. The Group prepares cash flow forecasts derived from the most recent financial budgets of Downstream segment approved by management for financial years 2025-2027 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 3.5%.

Consumer Services

In assessing recoverable amount, the estimated future cash flows are discounted to their present value using a post-tax discount rate. The pre-tax discount rate is determined by way of iteration.

Post-tax discount rates calculated using weighted average cost of capital (WACC) rates and country risk premium (CRP) applied to discount the forecast cash flows reflecting risks specific to the segment and specific to the certain countries vary between 7.7% and 9.2% in current year.

Pre-tax discount rates range from 9.0% to 13.0% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.

The growth rates are based on industry growth forecasts. The Group prepares cash flow forecasts derived from the most recent financial budgets of Consumer services segment approved by management for financial years 2025-2027 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 3.5%.

As a result of the impairment test, the total amount of goodwill on the Polish Retail network was impaired by HUF 37,714 million in 2023.

Impairment sensitivity assessment of the assets of the Slovenian Retail network:

- The recoverable amount of the asset (cash-generating unit) is the value in use.
- The value in use of the Slovenian Retail Network assets is HUF 150,374 million.
- The book value of assets including goodwill is HUF 138,322 million.
- Sensitivity analysis of the key assumptions used in impairment test shows the following effects:
    - 1 percentage point increase in the post-tax discount factor indicates a decrease of HUF 12,706 million, 1 percentage point decrease results in an increase of HUF 14,221 million in the NPV.
    - +/- 1 percentage point alteration in gross margin indicates HUF 3,571 million difference in NPV.
    - +/- 1 percentage point alteration in fuel volume sold indicates HUF 1,368 million difference in NPV.
    - +/- 1 percentage point alteration in OPEX indicates HUF 2,428 million difference in NPV.

Corporate and other

In Hungary impairment was accounted for the goodwill recognised according to IFRS 3 on the step-up acquisition of ITK Group in 2023. No impairment was recognised on goodwill in 2024.

14. Business combinations, transactions with non-controlling interests

Accounting policies

The acquisition method of accounting is used for acquired businesses by measuring assets and liabilities at their fair values upon acquisition, the date of which is determined with reference to the settlement date. For each business combination the Group decides whether non-controlling interest is stated either at fair value or at the non-controlling interests' proportionate share of the acquiree's fair values of net assets. The income and expenses of companies acquired or disposed of during the year are included in the consolidated financial statements from the date of acquisition or up to the date of disposal.

Intercompany balances and transactions, including intercompany profits and unrealised profits and losses – unless the losses indicate impairment of the related assets – are eliminated. The consolidated financial statements are prepared using uniform accounting policies for like transactions and other events in similar circumstances.

Subsequently the carrying amount of non-controlling interests is the initially recognised amount of those interests adjusted with the non-controlling interests' share of changes in equity after the acquisition.

Changes in the Group's interests in subsidiaries that do not result in a loss of control are accounted for as equity transactions and recorded directly in retained earnings.

Business combinations under common control

The accounting policy choice under IFRS is either 'fair value as deemed cost approach' or 'cost based approach'. MOL Group generally adopts the 'cost based approach' but each transaction must be assessed individually and if there is a local legislation or regulation requiring a fair value approach then the 'cost based approach' may be overridden.

Acquisitions

a) Closed acquisitions

Acquisition of OMV Slovenija d.o.o.

MOL Group reached an agreement with OMV to acquire OMV's 92.25% stake in OMV Slovenija d.o.o. from OMV Downstream GmbH as direct shareholder. The agreed purchase price is EUR 301 million (100% share of OMV Slovenija) and subject to customary adjustments. The transaction includes 120 service stations across Slovenia.

The acquisition was successfully closed on 30 June 2023.

MOL is determined to ensure business continuity, relying on the professionalism and the expertise of the teams at its extended Slovenian network. OMV Slovenija d. o. o. has been renamed to MOL & INA d. o. o., with its headquarters remaining in Koper. MOL & INA as a part of MOL Group will strengthen the Group's position on the Slovenian market and enable retail and wholesale customers to access top quality products and services more conveniently in the future. Out of the newly acquired service stations, 27 is operating under the INA brand.

To meet European Commission requirement to complete the OMV Slovenija transaction, MOL Group in March 2023 concluded an asset sales and purchase agreement with Shell regarding 39 service stations of its joint Slovenian network. The transaction with Shell was closed in 2023.

As a result of the working capital and net debt settlement regulated in the SPA goodwill of 12,87 million EUR was recognised under the closing accounts mechanism.

MOL recognised additional 6,75 million EUR goodwill and purchase price liability in accordance with IFRS 3 based on the still unsettled dispute between OMV and MOL over the finale purchase price calculation regulated and defined by the Share Purchase Agreement (please refer to Note 25 d)).

OMV Slovenija d.o.o.	30 June 2023 HUF million
Non-current assets	**118,396**
Intangible assets	3,276
Property, plant and equipment	115,120
Current assets	**47,501**
Inventories	18,858
Trade and other receivables	25,406
Other financial assets (current)	62
Cash and cash equivalents	1,447
Other current assets	1,728
Non-current liabilities	**(22,805)**
Non-current provisions	(205)
Long-term debt	(7,245)
Deferred tax liability	(15,355)
Current liabilities	**(31,868)**
Current provisions	(11)
Short-term debt	(1,536)
Trade and other payables	(16,127)
Other current financial liabilities	(96)
Income tax payable	(166)
Other current liabilities	(13,932)
Net assets	**111,224**
Acquired net assets	**111,224**
Goodwill on acquisition	
Fair value of consideration transferred	102,481
INA investment valuated on fair value before additional acquisition	9,695
Prepayment	12,915
Contingent consideration	7,280
Less: fair value of identifiable net assets acquired	(111,224)
Goodwill on acquisition	**21,147**

Net cash outflow / (inflow) on acquisition of subsidiaries	
Consideration paid in cash	102,481
Less: cash and cash equivalent balances acquired	(1,447)
Net cash outflow / (inflow)	**101,034**

According to IFRS 3 the following intangible assets were identified and recognised: customer relationship in the amount of HUF 3,215 million.

Factors that make up the goodwill recognised include expected synergies from fuel supply within MOL Group. It will not be deductible for tax purposes.

The acquired company contributed the following net sales and profit (+) / loss (-) after-tax for the period between the acquisition and the balance sheet date to the Group's consolidated profit for the year:

Acquired Company 30 June 2023 - 31 December 2023	Net revenue HUF million	Profit/(loss) for the period HUF million
OMV Slovenija d.o.o.	159,739	1,408

If the business combination had taken place on 1 January 2023, it is estimated that the acquired activities would have generated net revenue of HUF 328,229 million and profit/(loss) for the period of HUF 8,975 million.

Acquisition of NHSZ Nemzeti Hulladékgazdálkodási Szolgáltató Ltd.

MOL was announced as the winner of the Hungarian government’s concession tender for municipal waste management services. The concession agreement covers a period of 35 years. Under the terms of the agreement, MOL will be responsible for the collection of nearly 5 million tonnes of municipal solid waste, will ensure its treatment and will make related investments.

The aim of the reorganization is to achieve the extremely strict waste management targets set by the European Union.

In accordance with the concession agreement, on 28 July 2022 MOL signed an agreement with the Hungarian State to acquire 100% of the shares of NHSZ Nemzeti Hulladékgazdálkodási Szolgáltató Ltd. and its subsidiaries and associates.

NHSZ is a public service provider on the municipal waste market, owner of 16 subsidiaries in different percentages, responsible for serve more than 700 thousand citizens. It owns of several depos, sorting equipment, junk yards and vehicles.

MOL closed the transaction on 31 July 2023. The acquisition is in line with MOL's 2030+ Shape Tomorrow strategy by enabling the realisation of synergies in moving to a more integrated model of waste management services. NHSZ was renamed after closing to MOHU Holding Ltd.

MOL conducted an assessment of the control in each of the 17 acquired companies and identified 10 companies for full consolidation. In assessing control MOL considered its power over the investee, its right to variable returns and its ability to use power to affect the level of returns.

NHSZ Nemzeti Hulladékgazdálkodási Szolgáltató Ltd.	31 July 2023 HUF million
Non-current assets	**14,119**
Intangible assets	23
Property, plant and equipment	10,448
Other non-current asset	3,480
Deferred tax asset	168
Current assets	**10,167**
Inventories	251
Other financial assets (current)	219
Income tax receivables	41
Trade and other receivables	3,732
Cash and cash equivalents	5,175
Other current assets	649
Assets classified as held for sale	100
Non-current liabilities	**(4,525)**
Non-current provisions	(1,499)
Long-term debt	(2,634)
Other non-current liabilities	0
Deferred tax liability	(392)
Current liabilities	**(3,932)**
Current provisions	(36)
Short-term debt	(544)
Trade and other payables	(2,562)
Other financial liabilities (current)	(7)
Income tax payable	(33)
Other current liabilities	(750)
Net assets	**15,829**
Of which minority's part	**(895)**
MOL Group's share of net assets	**14,934**
Goodwill on acquisition	
Fair value of consideration transferred	14,486
Less: fair value of identifiable net assets acquired	(14,934)
Goodwill on acquisition	**(448)**
Net cash outflow / (inflow) on acquisition of subsidiaries	
Consideration paid in cash	14,486
Less: cash and cash equivalent balances acquired	(5,040)
Net cash outflow / (inflow)	**9,446**

The acquired company contributed the following net sales and profit (+) / loss (-) after-tax for the period between the acquisition and the balance sheet date to the Group's consolidated profit for the year:

Acquired Company 31 July 2023 - 31 December 2023	Net revenue HUF million	Profit/(loss) for the period HUF million
NHSZ Nemzeti Hulladékgazdálkodási Szolgáltató Ltd.	3,543	(2,833)

The acquired NHSZ company controlled more subsidiaries during the year, from which some were carved out during the closing process. Disclosing revenue and profit information for the combined entity for 2023 is impracticable, since such data is not readily available for the acquired portfolio elements and the costs of obtaining that information would exceed its utility to readers.

Acquisition of waste management business in Budapest region

MOL Plc. and BKM Ltd., the former provider of waste management services in the capital, concluded a shareholders' agreement on 13 April 2023 in order to implement the new national waste management concession model in Budapest. Based on the agreement, BKM transferred its waste management division it owned to a newly established company, MOHU Budapest Ltd. and became 50% owner of

MOHU Budapest. MOL Plc. became the owner of the remaining 50% by providing cash contribution to MOHU Budapest equal to the value of the assets contributed by BKM. In accordance with the shareholders' agreement an asset valuation was carried out by an independent expert for the entire asset portfolio provided by BKM, based on which the value of the assets – and the capital increase provided by MOL – was determined at HUF 26 billion. Based on the agreement between the parties the waste utilisation plant in Budapest (HUHA), and the regional waste management center in Pusztazámor (PRHK) were not transferred to MOHU Budapest as part of the contribution, but by a way of a separate sale, the purchase price of which was also determined by an independent expert according to the agreement between the parties.

The jointly owned company started its operation on 1 April 2024, and it is fully consolidated by MOL Group in accordance with IFRS 10.

BKM provides the company its expertise, assets and profession with more than 125 years of experience and MOL provides its capital strength, energy expertise and connections to the industry it operates in. Overall, this partnership will enable sustainable circular waste management in the Budapest region, including further opportunities to develop the services MOHU Budapest provides.

MOHU Budapest Plc.	1 April 2024 HUF million
Non-current assets	**74,020**
Intangible assets	483
Property, plant and equipment	73,488
Deferred tax asset	49
Current assets	**26,633**
Inventories	796
Trade and other receivables	6
Other financial assets (current)	15
Cash and cash equivalents	25,791
Other current assets	25
Non-current liabilities	**(9,214)**
Non-current provisions	(545)
Long-term debt	(8,669)
Deferred tax liability	-
Current liabilities	**(39,857)**
Current provisions	-
Short-term debt	(1,066)
Trade and other payables	(38,791)
Other current financial liabilities	-
Income tax payable	-
Other current liabilities	-
Net assets	**51,582**
Acquired net assets	**51,582**
Of which minority's part	**25,791**
MOL Group's share of net assets	**25,791**
Goodwill on acquisition	
Fair value of consideration transferred	25,791
Prepayment	-
Contingent consideration	-
Less: fair value of identifiable net assets acquired	25,791
Goodwill on acquisition	-
Net cash outflow / (inflow) on acquisition of subsidiaries	
Consideration paid in cash	25,791
Less: cash and cash equivalent balances acquired	(25,791)
Net cash outflow / (inflow)	**-**
Cash and cash equivalent balances acquired	-
Net cash outflow / (inflow)	**-**

The acquired business contributed the following net sales and profit (+) / loss (-) after-tax for the period between the acquisition and the balance sheet date to the Group's consolidated profit for the year:

Acquired Business 01 April 2024 - 31 December 2024	Net revenue HUF million	Profit/(loss) for the period HUF million
MOHU Budapest Plc.	5,414	(37,150)

Acquisition of Mercarius Flottakezelő Ltd.

On 15 November 2024, MOL Group signed an agreement with one of Hungary's largest and fastest growing fleet management companies, Mercarius Flottakezelő, which currently manages nearly 14,000 vehicles. Under this agreement, MOL Fleet Solution and Mercarius created a joint holding company, which will continue to operate under the name MOL Mercarius. As the second largest player in the fleet market, the new company will manage more than 20,000 vehicles operationally.

The focus of the company's updated long-term strategy is to become a complex mobility service provider by 2030, in which the acquisition of a stake and joint work in the largest 100% Hungarian-owned fleet management company fits well.

Mercarius Flottakezelő is also the owner of Mercar Used Cars, a company known for its reliability and transparency.

The main objective of the merger between the two companies is to take fleet management services to a new level and to further broaden the audience for MOL's mobility services. The transaction was closed on 17 December 2024, subject to clearance by the Competition Authority.

Mercarius Flottakezelő Ltd.	17 December 2024 HUF million
Non-current assets	**84,427**
Intangible assets	133
Property, plant and equipment	83,278
Other financial assets (non-current)	1,006
Other non-current asset	10
Current assets	**14,973**
Inventories	177
Trade and other receivables	4,389
Other financial assets (current)	1,762
Cash and cash equivalents	7,457
Other current assets	1,188
Assets classified as held for sale	**421**
Non-current liabilities	**(50,793)**
Non-current provisions	(120)
Long-term debt	(45,591)
Other non-current liabilities	(635)
Deferred tax liability	(4,447)
Current liabilities	**(20,578)**
Current provisions	(33)
Short-term debt	(15,403)
Trade and other payables	(2,923)
Other current financial liabilities	(24)
Income tax payable	(122)
Other current liabilities	(2,073)
Net assets	**28,450**
Of which minority's part	**18,968**
Acquired net assets	**9,482**
Goodwill on acquisition	
Fair value of consideration transferred	9,482
Less: fair value of identifiable net assets acquired	(9,482)
Goodwill on acquisition	**0**
Net cash outflow / (inflow) on acquisition of subsidiaries	
Cash and cash equivalent balances acquired	(7,457)
Net cash outflow / (inflow)	**(7,457)**

Disclosing revenue and profit information for the combined entity for 2024 is impracticable, since such data is not readily available for the acquired portfolio elements and the costs of obtaining that information would exceed its utility to readers.

b) Other closed acquisitions

Acquisition of Új Lila Labdarúgó Ltd.

On 6 February 2024, MOL Group entered into an agreement with Újpest Labdarúgó Ltd. as direct owner to acquire Új Lila Labdarúgó Ltd., a company that holds 99.75% of the companies that own the licenses, equipment and employ the employees necessary for the continuous operation of Újpest Labdarúgó Klub. The transaction closed on 21 March 2024. The acquisition met the criteria of IFRS 3 concentration test and was accounted as an asset deal.

c) Ongoing acquisitions

MOL entered into a sale and purchase agreement on 17 December 2024 with O&GD Central Ltd. to purchase a gas plant, mining plots and infrastructure near Endrőd in Eastern Hungary. The current production is around 1.1 mboepd and the mining plots are hosting multiple drillable exploration opportunities. Related infrastructure has considerable synergy potential with other MOL assets in the region.

The transaction is subject to regulatory approvals and is expected to close in the first half of 2025.

On 20 November 2024, MOL signed an agreement to acquire a business that can extract precious metals from e-waste with high efficiency using its patented hydrometallurgy technology in Hungary. The transaction is expected to close in the first half of 2025.

Both transactions' acquisition closing process is ongoing, control is not yet obtained, transactions are not material for the Group.

d) Update on acquisition of Aurora Kunststoffe GmbH and its subsidiaries

On 31 October 2019, MOL Group has acquired 100% shareholding of Aurora Kunststoffe GmbH. The final earn-out amount determined by independent advisor in 2024 was HUF 9,861 million (EUR 24.914 million) according to the sale and purchase agreement.

15. Inventories

Accounting policies

Inventories, including work-in-progress are valued at the lower of cost and net realisable value, after provision for slow-moving and obsolete items. Net realisable value is the selling price in the ordinary course of business, less the costs of making the sale. Inventories (including purchased oil and gas) must be measured at weighted average costs; increases of inventories are recognised at actual purchase price, and decreases of inventories recognised at weighted average cost. The shop inventories of filling stations are measured at average purchase price. Internally produced inventories are measured at average costs with monthly cost allocation. The acquisition cost of own produced inventory consists of direct materials, direct wages and the appropriate portion of production overhead expenses including royalty. Inventory with nil net realisable value is fully written off.

	31 Dec 2024		31 Dec 2023	
	At cost	Lower of cost or net realisable value	At cost	Lower of cost or net realisable value
	HUF million	HUF million	HUF million	HUF million
Work in progress and finished goods	532,249	526,219	427,051	420,907
Purchased crude oil	182,488	182,164	203,861	203,387
Other goods for resale	88,618	87,802	106,165	105,424
Other raw materials	104,239	82,587	117,897	98,855
Purchased natural gas	1,755	1,755	2,087	2,087
Inventories classified as held for sale	-	-	(87)	(87)
Total	**909,349**	**880,527**	**856,974**	**830,573**

During the year 2024 HUF 6,964,684 million of inventories have been recognised as an expense, of which impairment of HUF 17,917 million has been recorded (2023: HUF 9,142 million), mainly on raw materials.

Inventories are driven by weakening HUF rates and partly offset by lower volumes in MOL and SN.

Inventories pledged as security

The carrying amount of inventories pledged as security for liabilities is HUF 1,583 million as of 31 December 2024 (2023: HUF 3,095 million).

16. Material non-controlling interest

Accounting policies

According to IFRS 12 Disclosure of Interest in Other Entities, MOL Group discloses information about non-controlling interests' share of the profit or loss, cash flow and net asset of the subsidiaries that have non-controlling interests that are material to the reporting entity. Materiality is assessed by the Group on the basis of the consolidated financial statements. The disclosed information is based on balances before intercompany eliminations.

INA-Industrija nafte d.d.

MOL Group has 49% shareholding interest in INA-Industrija nafte d.d. (hereinafter INA d.d.), however based on the conditions of the shareholders' agreement MOL Group has been provided control over INA d.d. resulting in full consolidation method with 51% non-controlling interest.

Based on the SHA signed in January 2009 between MOL Plc. and the Government of the Republic of Croatia MOL is entitled to control rights through the majority both in the Supervisory Board and the Management Board. MOL is entitled to nominate 5 members to the Supervisory Board of 9 members, furthermore nominate 3 members and the President to the Management Board of 6 members. In the event of tied vote, the President of the Management Board has the tie-breaking vote.
All other NCI are immaterial for the Group.
Proportion of equity interest held by non-controlling interests of INA Group:

Name	Proportion of non-controlling interest 31 Dec 2024	31 Dec 2023
INA-Industrija nafte d.d.	51%	51%

	31 Dec 2024	31 Dec 2023
Accumulated balances of material non-controlling interest	365,158	357,673
Profit/(Loss) allocated to material non-controlling interest	56,080	18,416

The summarised financial information of INA Group is provided below. This information is based on amounts before intercompany eliminations.

Summarised statement of profit or loss	2024 HUF million	2023 HUF million
Total operating income	1,551,439	1,513,795
Total operating expenses	(1,470,530)	(1,402,685)
Finance income/(expense), net	(4,882)	(12,265)
Profit/(loss) before income tax	**76,027**	**98,845**
Income tax (expense)/income	(13,923)	(19,393)
Profit/(loss) for the year	**62,104**	**79,452**
Total comprehensive income	**110,138**	**36,168**
Attributable to non-controlling interests	56,080	18,416
Dividends paid to non-controlling interests	(48,595)	(38,072)

Summarised statement of financial position	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Current assets	357,168	329,107
Non-current assets	1,100,378	968,631
Total assets	**1,457,546**	**1,297,738**
Current liabilities	(391,117)	(296,543)
Non-current liabilities	(349,280)	(298,746)
Total liabilities	**(740,397)**	**(595,289)**
Total equity	**717,149**	**702,449**
Attributable to owners of parent	351,991	344,776
Attributable to non-controlling interest	365,158	357,673

Summarised cash flow information	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Cash flows from operations	115,339	163,796
Cash flows used in investing activities	(114,691)	(158,364)
Cash flows used in financing activities	(20,891)	(78,041)
Increase/(decrease) in cash and cash equivalents	**(20,243)**	**(72,609)**

17. Disposals

On 27th May 2024, MOL has signed an agreement with Sand Hill Petroleum Romania SRL to transfer its interest in EX-1 (30%) and EX-5 (20%) blocks to Sand Hill. As part of the agreement, all the assets, all the liabilities and all remaining (work programme) commitments related to these blocks are transferred to Sand Hill. The transaction is pending on Government/ NAMR approval. The transaction is not material for the Group.

Assets held for sale and discontinued operations are presented in Note 19.

18. Other non-current assets

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Obligatory level of inventory required by state legislations	45,808	48,027
Advance payments for assets under construction	28,037	22,898
Prepaid fees of long-term rental fees	352	517
Advance payments for intangible assets	39	113
Other	707	440
Total	**74,943**	**71,995**

19. Other current assets

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Prepaid and recoverable taxes and duties (excluding income taxes)	93,668	91,018
Advance payments	27,848	28,068
Prepaid expenses	18,109	14,137
Dividend receivable	246	301
Other	993	876
Total	**140,864**	**134,400**

Other item contains mainly revenue accruals and receivables regarding employees.

20. Provisions

Accounting policies

Provision is made for the best estimate of the expenditure required to settle the present obligation (legal or constructive) as a result of past event where it is considered to be probable that a liability exists, and a reliable estimate can be made of the outcome. Long-term obligation is discounted to the present value. Where discounting is used, the carrying amount of the provisions increases in each period to reflect the unwinding of the discount by the passage of time. This increase is recognised as interest expense. Provisions are reviewed at each balance sheet date and adjusted to reflect the current best estimate.

Where it is possible that a settlement may be reached or it is not possible to make a reliable estimate of financial impact, appropriate disclosure is made but no provision created.

Provision for Environmental expenditures

Environmental expenditures that relate to current or future economic benefits are expensed or capitalised as appropriate. Liabilities for environmental costs are recognised when environmental assessments or clean-ups are probable, and the amount recognised is the best estimate of the expenditure required. In case of long-term liability, the present value of the estimated future expenditure is recognised.

Provision for Field abandonment

The Group records a provision upon initial recognition for the present value of the estimated future cost of abandonment of oil and gas production facilities following the termination of production. At the time the obligation arises, it is provided for in full by recognising the present value of future field abandonment and restoration expenses as a liability. An equivalent amount is capitalised as part of the carrying amount of long-lived assets. The estimate is based upon current legislative requirements, technology and price levels. A corresponding item of property, plant and equipment of an amount equivalent to the provision is also created. This is subsequently depreciated as part of the capital costs of the facility or item of plant (on a straight-line basis in Downstream and using the unit-of production method in Upstream). Any change in the present value of the estimated expenditure is reflected as an adjustment to the provision and the corresponding property, plant and equipment.

Provision for Redundancy

The employees of the Group are eligible, immediately upon termination, for redundancy payment pursuant to the terms of Collective Agreement between the Group and its employees. The amount of such a liability is recorded as a provision in the consolidated statement of financial position when the workforce reduction programme is defined, adopted, announced or has started to be implemented.

Provision for Long-term employee benefits

The cost of providing benefits under the Group's defined benefit plans is determined separately for each plan using the projected unit credit actuarial valuation method. Actuarial gains and losses of retirement benefits are recognised as other comprehensive income immediately. Past service costs, resulting from the introduction of, or changes to the defined benefit scheme are recognised as an expense immediately.

Net interest expense is calculated on the basis of the net defined benefit obligation and disclosed as part of the finance result. Differences between the return on plan assets and interest income on plan assets included in the net interest expense is recognised in other comprehensive income.

Provision for Legal claims

Provision is made for legal cases if the negative expected outcome of the legal case is more likely than not.

Provision for Emission quotas

The Group recognises provision for the estimated CO_2 emissions costs when actual emission exceeds the emission rights granted and still held. When actual emission exceeds the amount of emission rights granted, provision is recognised for the exceeding emission rights based on carrying amount of purchased quotas held for compliance, the purchase price of allowance concluded in forward contracts, and for any residual excess at market quotations at the reporting date. In addition, the Group recognises provision for estimated costs of Upstream emission reduction quotas (UER) intended to be used to fulfil obligations stipulated by EU Fuel Quality Directive.

Significant accounting estimates and judgements

A judgement is necessary in assessing the likelihood that a claim will succeed, or liability will arise, and to quantify the possible range of any settlement. Due to the inherent uncertainty on this evaluation process, actual losses may be different from the liability originally estimated.

Scope, quantification and timing of environmental and field abandonment provision

The Group holds provisions for the future decommissioning of oil and natural gas production facilities and pipelines at the end of their economic lives. Most of these decommissioning events are many years in the future and the precise requirements that will have to be met when the removal event occurs are uncertain. Decommissioning technologies and costs are constantly changing, as well as political, environmental, safety and public expectations. Management uses its previous experience and its own interpretation of the respective legislation to determine environmental and field abandonment provisions.

Actuarial estimates applied for calculation of retirement benefit obligations

The cost of defined benefit plans is determined using actuarial valuations, which involves making assumptions about discount rates, future salary increases and mortality or fluctuation rates. Due to the long-term nature of these plans, such estimates are subject to significant uncertainty.

Outcome of certain litigations

MOL Group entities are parties to a number of litigations, proceedings and civil actions arising in the ordinary course of business. Other provisions and liabilities are recognised in the period when it becomes probable that there will be a future outflow of funds resulting from past events and the amount of cash outflow can be reliably estimated. The timing of recognition and quantification of the liability require the application of judgement to existing facts and circumstances, which can be subject to change. Since the cash outflows can take place many years in the future, the carrying amounts of provisions and liabilities are reviewed regularly and adjusted to take account of changing facts and circumstances.

	Environ-mental HUF million	Field abandon-ment HUF million	Redundancy HUF million	Long-term employee benefits HUF million	Legal claims HUF million	Emission quotas and other HUF million	**Total HUF million**
Balance as of 1 Jan 2023	**79,487**	**454,436**	**2,814**	**31,620**	**5,796**	**125,295**	**699,448**
Acquisition / (sale) of subsidiaries	1,434	(68)	(23)	77	(932)	578	**1,066**
Additions and revision of previous estimates	940	(32,394)	306	12,453	1,638	105,870	**88,813**
Unwinding of the discount	1,774	18,963	-	2,589	-	1,831	**25,157**
Currency differences	(2,682)	(14,400)	(62)	(419)	(228)	(7,643)	**(25,434)**
Provision used during the year	(5,609)	(8,668)	(1,128)	(6,034)	(2,118)	(93,530)	**(117,087)**
Other movements	-	-	-	-	-	-	**-**
Balance as of 31 Dec 2023	**75,344**	**417,869**	**1,907**	**40,286**	**4,156**	**132,401**	**671,963**
Acquisition / (sale) of subsidiaries	-	-	(6)	137	174	557	**862**
Additions and revision of previous estimates	5,033	88,284	224	3,349	792	110,095	**207,777**
Unwinding of the discount	3,426	29,954	-	2,133	-	1,045	**36,558**
Currency differences	4,200	19,894	106	1,305	248	6,224	**31,977**
Provision used during the year	(7,307)	(1,005)	(807)	(4,989)	(1,959)	(108,216)	**(124,283)**
Other movements	-	-	-	-	-	-	**-**
Balance as of 31 Dec 2024	**80,696**	**554,996**	**1,424**	**42,221**	**3,411**	**142,106**	**824,854**
Current portion 31 Dec 2023	5,416	279	1,105	4,939	348	102,661	**114,748**
Non-current portion 31 Dec 2023	69,928	417,590	802	35,347	3,808	29,740	**557,215**
Current portion 31 Dec 2024	6,811	2,579	687	5,719	264	101,539	**117,599**
Non-current portion 31 Dec 2024	73,885	552,417	737	36,502	3,147	40,567	**707,255**

Provision for Environmental expenditures

As of 31 December 2024, provision of HUF 80,696 million has been made for the estimated cost of remediation of past environmental damages, primarily soil and groundwater contamination and disposal of hazardous wastes, such as acid tar, in Hungary, Croatia, Slovakia, Romania and Italy. The provision is made on the basis of assessments prepared by MOL Group's internal environmental expert team. The amount of the provision has been determined on the basis of existing technology at current prices by calculating risk-weighted cash flows for a period up to 12 years, in case of upstream segment up to 50 years, discounted using estimated risk-free real interest rates. The amount reported as at 31 December 2024 also includes a contingent liability of HUF 24,032 million recognised upon acquiring IES S.p.A. (see Note 25).

MOL Group prepared a sensitivity analysis on the cash flow period applied on environmental provision. The analysis examined the impact of a +/- five-year change in the cash flow forecast period on the environmental provision compared to the year-end liability recognised. During the assessment the same discount rates were applied.

The results of the analysis are summarised in the table below showing the absolute and percentage change in the liability already recognised in the balance sheet:

Sensitivity analysis of environmental provision increase/(decrease)	**% change in the amount of the liability**	-5 years HUF million	**% change in the amount of the liability**	+5 years HUF million
MOL	(7.1)	(476)	5.8	389
MPK	(9.2)	(770)	7.7	643
INA	(30)	(4,757)	16.9	2,625
IES	(33.3)	(1,251)	33.3	1,251
Slovnaft	(36)	(7,833)	31	6,730
Total		**(15,087)**		**11,638**

Provision for Field abandonment

As of 31 December 2024, provision of HUF 554,996 million has been made for estimated total costs of plugging and abandoning wells upon termination of production. Approximately 10% of these costs are expected to be incurred between 2025 and 2029 and the remaining 90% between 2030 and 2081. The amount of the provision has been determined on the basis of management's understanding of the respective legislation, expected timing of cash flows calculated at current prices and discounted using estimated risk-free real interest rates based on current the best estimate of the management. Due to the climate change and energy transformation the timing of the expected cash flows of the field abandonement has high uncertainty and may change significantly in subsequent periods depending on the pace of the transition. Activities related to field suspension, such as plugging and abandoning wells upon termination of production and remediation of the area are planned to be performed by hiring external resources. Based on the judgement of the management, there will be sufficient capacity available for these activities in the area. As required by IAS 16 – Property, Plant and Equipment, the qualifying portion of the provision has been capitalised as a component of the underlying fields. Decommissioning rates used in the calculation of the liability are in a range of 5% and 28.2% depending on the risk-free rate, the inflation and the country risk premium in the given country.

MOL Group performed sensitivity analysis on the field abandonment liability by examining the +/- 1 percentage point change of the decommissioning rate. Decommissioning rate higher by one percentage point reduces the provision by 17%, while a decommissioning rate lower by one percentage point increases the provision by 22%.

Provision for Redundancy

As part of continuing efficiency improvement projects, INA d.d., IES S.p.A. and other Group members decided to further optimise workforce. As the management is committed to these changes and the restructuring plan was communicated in detail to parties involved, the Group recognised a provision for the net present value of future redundancy payments and related tax and contribution. Relating to the restructuring of activities in Mantova, a provision for redundancy of HUF 9,145 million was recognised at IES S.p.A. in 2013 out of which HUF 0 million remained as of 31 December 2024, and HUF 451 million general severance payment provision created as of 31 December 2024 due to local regulations. In 2015, a provision of HUF 9,804 million, in 2020, of HUF 6,269 million, in 2022, of HUF 3,015 million, and in 2023 of HUF 100 million was made for redundancy programme at INA d.d. out of which HUF 490 million remained as of 31 December 2024. The closing balance of provision for redundancy is HUF 1,424 million as of 31 December 2024 (31 December 2023: HUF 1,907 million).

Provision for Long-term employee benefits

As of 31 December 2024, the Group has recognised a provision of HUF 42,221 million to cover its estimated obligation regarding future retirement and jubilee benefits payable to current employees expected to retire from Group entities. These entities operate benefit schemes that provide lump sum benefit to all employees at the time of their retirement. MOL employees are entitled to 3 times of their final monthly salary regardless of the period of service, while MOL Petrochemicals and Slovnaft, a.s. provide a maximum of 2 and 7 months of final salary respectively, depending on the length of service period. In addition to the above-mentioned benefits, in Hungary the retiring employees are entitled to the absence fee for their notice period – which lasts for 1-3 months depending on the length of the past service – which is determined by the Hungarian Labour Code. None of these plans have separately administered funds; therefore, there are no plan assets. The amount of the provision has been determined using the projected unit credit method, based on financial and actuarial variables and assumptions that reflect relevant official statistical data which are in line with those incorporated in the business plan of the Group.

	2024 HUF million	2023 HUF million
Present value of total long-term employee benefit obligation at the beginning of the year	**40,286**	**31,620**
Acquisitions / (disposals)	137	77
Past service cost	351	4,788
Current service cost	3,293	3,298
Interest costs	2,133	2,589
Provision used during the year	(4,989)	(6,034)
Net actuarial (gain) / loss	(295)	4,367
from which:		
Retirement benefit (See Note 8)	(25)	2,664
Jubilee benefit	(270)	1,703
Exchange adjustment	1,305	(419)
Other movements		-
Present value of total long-term employee benefit obligation at year end	**42,221**	**40,286**

The other movements contain reclassification in long-term employee benefits between provision and other current and non-current liabilities.

The following table summarises the components of net benefit expense recognised in the statement of total comprehensive profit or loss as employee benefit expense regarding provision for long-term employee retirement benefits:

	2024 HUF million	2023 HUF million
Current service cost	3,293	3,298
Net actuarial (gain)/loss	(270)	1,703
Past service cost	351	4,788
Balance as at year end	**3,374**	**9,789**

The following table summarises the main financial and actuarial variables and assumptions based on which the amount of retirement benefits has been determined:

	2024 HUF million	2023 HUF million
Discount rate in %	1.96 - 7.48	2.79 - 7.12
Average wage increase in %	0.6 - 7.0	0.6 - 12.0
Mortality index (male)	0.03 - 3.01	0.03 - 3.01
Mortality index (female)	0.02 - 1.33	0.02 - 1.33

Actuarial (gains) and losses comprises of the following items:

	Retirement benefits		Jubilee benefits	
	2024 HUF million	2023 HUF million	2024 HUF million	2023 HUF million
Actuarial (gains)/losses arising from changes in demographic assumptions	(261)	(161)	(181)	(229)
Actuarial (gains)/losses arising from changes in financial assumptions	396	2,114	(192)	1,525
Actuarial (gains)/losses arising from experience adjustments	(160)	711	103	407
Total actuarial (gains)/losses	**(25)**	**2,664**	**(270)**	**1,703**

A quantitative sensitivity analysis for significant assumptions as at 31 December 2024 is, as shown below:

	Retirement benefits		Jubilee benefits	
	2024 HUF million	2023 HUF million	2024 HUF million	2023 HUF million
Discount rate:				
0.5% decrease	852	821	579	616
0.5% increase	(836)	(762)	(562)	(576)
Termination rate:				
50% decrease	4,609	4,186	3,225	3,210
50% increase	(3,327)	(2,977)	(2,470)	(2,481)

Provision for legal claims

As of 31 December 2024, provision of HUF 3,411 million (31 December 2023: HUF 4,156 million) has been made for estimated total future losses from litigations.

Provision for emission quotas and other provisions

As of 31 December 2024, the Group has recognised a provision of HUF 72,464 million for the shortage of emission quotas (31 December 2023: 90,852 million). The amount reported as at 31 December 2024 also includes provision for estimated costs of UER quotas in the amount of HUF 5,570 million (31 December 2023: HUF 1,603 million). For further information regarding the calculation method of estimated cost please refer to the accounting policy section.

As of 31 December 2024, the Group had available 3,431,288 (31 December 2023: 3,675,494) free emission quotas granted by the Hungarian, Croatian and Slovakian authorities. The total emissions during 2024 amounted to equivalent of 5,487,636 tons of emission quotas (2023: 5,840,026 tons).

As of 31 December 2024, the Group has recognised a provision of HUF 0 million in relation to IFRS 9 requirements (31 December 2023: HUF 583 million).

21. Other non-current liabilities

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Government grants received (see Note 9)	26,810	21,641
Received and deferred other subsidies	8,214	7,666
Deferred compensation for property, plant and equipment	3,574	3,909
Deferred income for apartments sold	1,444	1,348
Liabilities to government for sold apartments	124	198
Other	6,405	5,528
Total	**46,571**	**40,290**

Other item contains mainly the liability of customer loyalty points and advances received from customers.

22. Other current liabilities

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Taxes, contributions payable (excluding corporate tax any mining royalty)	243,940	230,508
Amounts due to employees	42,753	36,978
Advances from customers	15,226	23,502
Custom fees payable	8,538	7,243
Other accrued incomes	4,186	1,899
Fee payable for strategic inventory storage	3,077	4,425
Government subsidies received and accrued (see Note 9)	2,177	2,929
Dividend payable	1,502	785
Other	8,173	6,787
Total	**329,572**	**315,056**

Taxes, contributions payable mainly contributions to social security, value added tax and excise tax.

23. Asset held for sale and discontinued operation

A. Asset held for sale

Accounting policies

Non-current assets and disposal groups are classified as held for sale if their carrying amounts are to be realised by sale rather than through continued use. This is the case when the sale is highly probable, and the asset or disposal group is available for immediate sale in its present condition. Management must be committed to the sale, which should be expected to qualify for recognition as a completed sale within one year from the date of classification as held for sale, and actions required to complete the plan of sale should indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

Immediately before the initial classification of the asset as held for sale, impairment test shall be carried out. Non-current assets and disposal groups classified as held for sale are measured at the lower of carrying amount and fair value less costs to sell. Property, plant and equipment and intangible assets are no longer depreciated or amortised once classified as held for sale.

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Assets		
Property, plant and equipment	1,306	8,928
Intangible assets	-	486
Other non-current financial assets	100	100
Deferred tax assets	118	118
Inventories	-	87
Other current assets	-	53
Assets classified as held for sale	**1,524**	**9,772**

As of 31 December 2024, assets held for sale contained mainly service stations located in Hungary and Slovenia. The transaction was closed in Q2 2024 therefore the value of assets held for sale decreased by HUF 8,248 million.

B. Discontinued operation

Accounting policies

Discontinued operation is a component of an entity that either has been disposed of, or is classified as held for sale and:

- represents a separate major business line or geographical area of operations;
- its cash flows and operations are clearly distinguishable from the rest of the entity (both operationally and from financial reporting point of view);
- a single co-ordinate plan is in place to sell or otherwise dispose of it;
- a subsidiary acquired exclusively to resell it also qualifies as a discontinued operation.

In addition to the measurement and presentation requirements defined for disposal groups, the following disclosures are specified for discontinued operations:

- On the face of the income statement, the post-tax profit or loss from the discontinued operations and on the disposal or measurement to fair value (all other captions of the income statement therefore relate to continuing operations only)
- In the notes a detailed breakdown of this profit or loss
- Net cash flows attributable to the discontinued operations

On 23 March 2022, MOL Plc. signed an agreement with Waldorf Production Limited (WPL) covering the sale of its entire Upstream portfolio in the United Kingdom.

The divested offshore assets included MOL Plc.'s 20% stake in the Catcher field, a 50% stake in Scolty & Crathes and a 21.8% stake in Scott as well as stakes in a number of other licences. MOL Plc. has successfully closed the deal with WPL regarding the sale of its entire E&P portfolio in the United Kingdom on 10 November 2022. As a result of the transaction, Waldorf retained all future field abandonment liabilities.

On 4 June 2024, WPL and the ultimate parent company of the Waldorf Group, Waldorf Energy Partners Limited (WEPL) filed for administration. On the same day MOL received default notice from WPL, the counterparty to MOL in the 2022 sale of MOL's entire UK E&P portfolio. WEPL provided the Parent Company Guarantee to the transaction. At the time of the default, MOL had outstanding Waldorf receivables of HUF 25.203 million from an earnout agreement and HUF 16.672 million from a credit support agreement related to the Scott decommissioning trust. Impairment loss recognised due to the filed for administration HUF 41.567 million. MOL ranks as an unsecured creditor below secured creditors such as the holders of WPUK bonds (original issued amount: USD 300 million) and WEF bonds (original issued amount: USD 200 million). The appointed administrator is in the process of collecting the claims of all creditors and making efforts to honour as much claims as possible.

	2024 HUF million	2023 HUF million
Net sales	-	-
Other operating income	887	-
Total operating income	**887**	**-**
Raw materials and consumables used	-	-
Employee benefits expense	-	-
Depreciation, depletion, amortisation and impairment	-	-
Other operating expenses	41,567	2,471
Total operating expenses	**41,567**	**2,471**
Profit from discontinued operation	**(40,680)**	**(2,471)**
Finance income	(213)	2,022
Finance expense	-	-
Total finance expense, net	**(213)**	**2,022**
Profit/(Loss) before tax from discontinued operation	**(40,893)**	**(449)**
Income tax expense	-	-
Profit / (Loss) for the period from discontinued operations	**(40,893)**	**(449)**

Other operating expenses is higher compared to 2023 due to full impairment of Waldorf receivables. Total operating income changed due to fair valuation of the contingent receivable recognised in connection to the divestment of the UK operation. Finance income contain the interest from support agreement related to decommissioning trust and interest on the short-term loan.

	2024 HUF million	2023 HUF million
Profit/(Loss) before tax from discontinued operation	**(40,893)**	**(449)**
Cash flows from operations	**-**	**-**
Cash flows used in investing activities	**1,331**	**30,550**
Cash flows used in financing activities	**-**	**-**

Loss before tax from discontinued operation HUF 40.893 million due to the filed for administration. In 2023, cash flows used in investing activities contain the consideration received from the earn-out scheme.

FINANCIAL INSTRUMENTS, CAPITAL AND FINANCIAL RISK MANAGEMENT

This section explains policies and procedures applied to manage the Group's capital structure and the financial risks the Group is exposed to. This section also describes the financial instruments applied to fulfil these procedures. Hedge accounting related policies and financial instruments disclosures are also provided in this section.

Accounting policies

Initial recognition

Financial instruments are recognised initially at fair value (including transaction costs, for assets and liabilities not measured at fair value through profit or loss) when the entity becomes a party to the contractual provisions of the instrument. Trade receivables are recognised at transaction price if they do not contain a significant financing component. A regular way purchase or sale of financial assets is recognised using settlement date accounting.

Financial assets - Classification

The Group's financial assets are classified at the time of initial recognition depending on their nature and purpose. To determine which measurement category a financial asset falls into, it should be first considered whether the financial asset is an investment in an equity instrument or a debt instrument. Equity instruments should be classified as fair value to profit or loss, however if the equity instrument is not held for trading, fair value through other comprehensive income option can be elected at initial recognition. If the financial asset is a debt instrument, the instrument should be classified either as amortised cost, fair value through other comprehensive income of fair value through profit and loss based on the Group's business model for managing the financial assets and the contractual cash flow characteristics of the financial assets. All derivatives in scope of IFRS 9 are measured at fair value. Value changes are recognised in profit or loss unless the entity has elected to apply hedge accounting by designating the derivative as a hedging instrument in an eligible hedging relationship. In case of deliverable transactions, which are part of normal sales and purchases of the entity ,the accounting treatment of sale of goods shall be applied.

Financial liabilities – Classification

By default, financial liabilities are measured at amortised cost, unless they are required to be measured at fair value through profit or loss or the entity has opted to measure a liability at fair value through profit or loss. A financial liability is required to be measured at fair value through profit or loss in case of liabilities that are classified as 'held for trading' and derivatives.

Subsequent measurement

Subsequent measurement depends on the classification of the given financial instrument.

Amortised cost

The asset or liability is measured at the amount recognised at initial recognition minus principal repayments, plus or minus the cumulative amortisation of any difference between that initial amount and the maturity amount, and in case of financial assets any loss allowance. Interest income or expense is calculated using the effective interest method and is recognised in profit and loss. Changes in the carrying amounts are recognised in profit and loss when the asset is derecognised or reclassified.

Fair value through other comprehensive income – debt instrument

The asset is measured at fair value. Interest revenue, impairment gains and losses, and foreign exchange gains and losses, are recognised in profit and loss on the same basis as for amortised cost assets. Changes in fair value are recognised in other comprehensive income. When the asset is derecognised or reclassified, changes in fair value previously recognised in other comprehensive income and accumulated in equity are reclassified to profit and loss on a basis that always results in an asset measured at fair value through other comprehensive income having the same effect on profit and loss as if it were measured at amortised cost.

Fair value through other comprehensive income – equity instrument

Dividends are recognised when the entity's right to receive payment is established, it is probable the economic benefits will flow to the entity and the amount can be measured reliably. Dividends are recognised in profit and loss unless they clearly represent recovery of a part of the cost of the investment, in which case they are included in other comprehensive income. Changes in fair value are recognised in other comprehensive income and are never recycled to profit and loss, even if the asset is sold.

Fair value through profit or loss

The asset or liability is measured at fair value. Changes in fair value are recognised in profit and loss as they arise.

Fair value measurement

Fair value of instruments is determined by reference to quoted market prices at the close of business on the balance sheet date without any deduction for transaction costs. For investments where there is no quoted market price, fair value is determined by reference to the current market value of another instrument which is substantially the same or is calculated based on the expected cash flows of the underlying net asset base of the investment.

Derecognition of Financial Instruments

Derecognition of a financial asset takes place when the Group no longer controls the contractual rights that comprise the financial asset, which is normally the case when the instrument is sold, or all the cash flows attributable to the instrument are passed through to an independent third party. When the Group neither transfers nor retains all the risks and rewards of the financial asset and continues to control the transferred asset, it recognises its retained interest in the asset and a liability for the amounts it may have to pay.

A financial liability should be removed from the balance sheet when, and only when, it is extinguished, that is, when the obligation specified in the contract is either discharged or cancelled or expires.

Hedging

For the purpose of hedge accounting, hedges are classified as either:

- cash flow hedges or

- hedges of a net investment in a foreign operation.

At the inception of a hedge relationship, the Group formally designates and documents the hedge relationship to which the Group wishes to apply hedge accounting together with the risk management objective and strategy for undertaking the hedge. Such hedges are expected to be effective in achieving offsetting changes in fair value or cash flows and are assessed on an ongoing basis to determine that they actually have been highly effective throughout the financial reporting periods for which they were designated. The Group applies the rules of IFRS 9 in case of hedge accounting.

Hedges which meet the strict criteria for hedge accounting are accounted for as follows:

Cash flow hedges
Cash flow hedges are hedges of the exposure to variability in cash flows that is attributable to a particular risk associated with a recognised asset or liability or a highly probable forecast transaction that could affect the statement of profit or loss. The effective portion of the gain or loss on the hedging instrument is recognised directly as other comprehensive income, while the ineffective portion is recognised in the statement of profit or loss. Amounts taken to other comprehensive income are transferred to the statement of profit or loss when the hedged transaction affects the statement of profit or loss. Where the hedged item is the cost of a non-financial asset or liability, the amounts previously taken to equity are transferred to the initial carrying amount of the non-financial asset or liability.

Hedges of a net investment

Hedges of a net investment in a foreign operation, including a hedge of a monetary item that is accounted for as part of the net investment, are accounted for in a way similar to cash flow hedges. Gains or losses on the hedging instrument relating to the effective portion of the hedge are recognised as other comprehensive income while any gains or losses relating to the ineffective portion are recognised in the statement of profit or loss. On disposal of the foreign operation, the cumulative value of any such gains or losses recognised as other comprehensive income is transferred to the statement of profit or loss.

Impairment of Financial Assets

The impairment model of financial assets is based on the premise of providing for expected losses. The loss allowances for financial assets are based on assumptions about risk of default and expected loss rates. As a general approach, impairment losses on a financial asset or group of financial assets are recognised for expected credit losses at an amount equal to:

- 12-month expected credit losses (expected credit losses that result from those default events on the financial instrument that are possible within 12 months after the reporting date), or
- full lifetime expected credit losses (expected credit losses that result from all possible default events over the life of the financial instrument).

The loss allowance for financial instruments is measured at an amount equal to full lifetime expected losses if the credit risk of a financial instrument has increased significantly since initial recognition. If the credit risk of the financial instrument is low at the reporting date it can be assumed that credit risk on the financial instrument has not increased significantly since initial recognition and 12-month expected credit losses can be applied. The Group determines significant increase in credit risk in case of debt securities based on credit rating agency ratings. As there is a rebuttable presumption that the credit risk on a financial asset has increased significantly since initial recognition when contractual payments are more than 30 days past due assessment is required on a case-by-case basis whether the credit risk significantly increased in that financial asset when such an event occurs.

Additionally, the Group applies the simplified approach to recognise full lifetime expected losses from origination for trade receivables, IFRS 15 contract assets and lease receivables. For all other financial instruments, general approach is applied.

The Group calculates the expected credit loss on trade receivables as the average of yearly historical loss rates of the last three years multiplied by the forward-looking element. The forward-looking element is based on positive correlation between banking sector credit losses and one year lag of unemployment rate. In case of other financial assets the expected credit loss of the instrument will be determined by multiplying the probability of default rate of the instrument with the loss given default of the instrument.

An entity shall recognise in profit or loss, as an impairment gain or loss, the amount of expected credit losses (or reversal) that is required to adjust the loss allowance at the reporting date.

Independently of the two approaches mentioned above, impairment losses recognised where there is an objective evidence on impairment due to a loss event and this loss event significantly impacts the estimated future cash flows of the financial asset or group of financial assets. These are required to be assessed on a case-by-case basis. The maximum amount of impairment accounted for by the Group is 100% of the unsecured part of the financial asset. The amount of loss is recognised in the statement of profit or loss. The following indicatators are objective evidence for impairment, but it is not limited to it:

- contractual payment is 180 days past due
- default of the issuer
- a breach of contract, such as a default or past-due event;
- partial release of claim
- legal procedure started against the debtor
- the disappearance of an active market for the financial asset because of financial difficulties

If the expected cash inflow of the financial asset significantly exceeds its carrying amount (the criteria of the impairment only partially or not at all exist), the impairment that was recognised earlier must be reversed partly or fully. As a result of the reversal the amount of the receivable must not exceed the original outstanding receivable

Significant accounting estimates and judgements

For determination of fair value, management applies estimates of the future trend of key drivers of such values, including, but not limited to yield curves, foreign exchange and risk-free interest rates, and in case of the conversion option volatility of MOL share prices and dividend yield.

The loss allowances for financial assets are based on assumptions about risk of default and expected loss rates. The Group uses judgement in making these assumptions and selecting the inputs to the impairment calculation, based on the Group’s past history and existing market conditions, as well as forward-looking estimates at the end of each reporting period.

24. Financial risk and capital management

Financial risk management

Financial risk management is a centralised function at MOL Group, which makes possible to monitor and measure all financial risks centrally. As a result, Treasury Liquidity and Financial Risk Report are submitted to the senior management quarterly.

As a general approach, risk management considers the business as a well-balanced integrated portfolio. MOL Group. actively manages its commodity exposures for the following purpose:

- protection of financial ratios and targeted financial results
- reducing the exposure of cash flow to market price fluctuations.

Capital management

The primary objective of the MOL Group's capital management is to ensure that it maintains a strong credit rating and healthy capital ratios in order to support its business and maximise shareholder value.

The MOL Group manages its capital structure and makes adjustments to it in light of changes in economic conditions.

2x is the early warning indicator in net debt to EBITDA where MOL Group might consider making changes in its capital structure. Since net debt to EBITDA ratio stabilized well below 1 during 2024, there is no open decision point on it.

The long-term healthy net gearing ratio is expected to be 30% debt and 70% equity at MOL Group. If the ratio diverges permanently from this level the MOL Group might consider making changes in its capital structure. Since the ratio does not differ from the 30% significantly (14.9% in 2024) there is no open decision point on it. For the calculation of the net gearing and net debt/EBITDA ratio please refer to Note 20/C.

To maintain or adjust the capital structure, the MOL Group may adjust the dividend payment to shareholders, return capital from shareholders or issue new shares. Treasury share (put-call option) transactions are also applied for such purposes.

a) Key exposures

Risk Management identifies and measures the key risk drivers and quantifies their impact on the MOL Group's operating results. MOL Group is monitoring key exposures, the diesel crack spread, the crude oil price and gasoline crack spread have the biggest contribution to the cash flow volatility.

Commodity price risk

MOL Group as an integrated oil and gas company is exposed to commodity price risk on demand and supply side as well. The main commodity risks stem from the fact downstream processing more crude oil than our own crude oil production. In Upstream MOL Group has long position in crude oil and in Downstream MOL Group has a long position in refinery margin. Investors buying oil industry shares are generally willing to take the risk of oil business so commodity price risk should not be fully eliminated from the cash flow. When necessary, commodity hedging is considered to eliminate risks other than 'business as usual' risks or general market price volatility.

In 2024 MOL Group. concluded short and mid-term commodity swap and option transactions. These transactions are mainly conducted for operational hedging purposes, in order to mitigate the effects of the price volatility in our operations and at the same time, when possible, to lock in favourable forward curve structure.

Commodity risk is monitored based on Value at Risk measure.

Foreign currency risk

The Group has FX exposure due to mismatch of currency composition of cash inflows and outflows, investments, debts.

MOL Group relies on economic currency risk management principle that the currency mix of the debt portfolio should reflect the net long-term currency position of profit generation ('natural hedge'). However, in circumstances where insisting to this principle without any flexibility is disadvantageous for the company our practice allows using foreign exchange derivatives as well. The main motivation here is safeguarding the financial covenant compliance.

Interest rate risk

As an energy company, MOL Group has limited interest rate exposure. The ratio of fix / floating interest burdened debt is monitored by Group Treasury.

Beside contracting loan agreements with a given fix / float interest rate MOL Group also has the flexibility to manage its level of interest rate risk exposure via interest rate swaps.

Credit risk

MOL Group sells products and services to a diversified customer portfolio - both from business segment and geographical point of view – with a large number of customers representing acceptable credit risk profile.

Policies and procedures are in place to set the framework and principles for customer credit risk management and collection of receivables to minimise credit losses deriving from delayed payment or non-payment of customers, to track these risks on a continuous basis and to provide financial support to sales process in accordance with MOL Group's strategic plans regarding sales and ability to bear risk.

Creditworthiness of customers with deferred payment term is thoroughly assessed, regularly reviewed and appropriate credit risk mitigation tools are applied. According to the MOL Group's policy, customer credit limits should be covered by payment securities where applicable: credit insurance, bank guarantee, letter of credit, cash deposit and lien are the most preferred types of security to cover customer credit risk.

Individual customer credit limits are calculated taking into account external and/or internal assessment of customers as well as the securities provided. Information on existing and potential customers is based on well-known and reliable Credit Agencies and available internal data.

Various solutions support the customer credit management procedures, including monitoring of credit exposures for immediate information on breach and expiry of credit limits or guarantees. When such credit situations occur, deliveries shall be blocked; decisions on the unblocking of deliveries shall be made by authorised persons on both Financial and Business sides.

Credit risk of the investment portfolio is safeguarded by a rating grid concept. For bank deposits, an Internal Rating system is applied to reasonably diversify and mitigate the partner bank counterparty risks of MOL Group by proper distribution of available cash among banks (both group and entity level) based on their external and respective sovereign ratings. For securities, external ratings are taken into account for the limit calculation. Limits, their utilisations and escalation procedures are continuously managed and controlled by Cash Management areas of the Group.

Liquidity risk

The Group aims to manage liquidity risk by covering liquidity needs from bank deposits, other cash equivalents and from adequate amount of committed credit facilities. Besides, on operational level various cash pools throughout the Group help to optimise liquidity surplus and need on a daily basis.

The existing bank facilities and the available cash and cash equivalents ensure both level of liquidity and financial flexibility for the Group.

The amount of undrawn major committed credit facilities	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Long-term loan facilities available	1,089,836	953,092
Short-term facilities available	57,316	101,013
Total loan facilities available	**1,147,152**	**1,054,105**
Cash and cash equivalents	433,610	412,977
Total available liquidity	**1,580,762**	**1,467,082**

MOL Group Finance Plc. as borrower and MOL as guarantor signed a EUR 560 million ESG KPI Linked multicurrency revolving credit facility agreement (the “Agreement”) on 25 October 2024. The tenor of the facility is 5 years with two 1-year extension options. Simultaneously, the total available commitment is cancelled under the EUR 555 million revolving credit facility agreement concluded by MOL Group Finance Plc. on 9 July 2018. The Agreement was arranged as a club deal with 13 banking groups, with Erste Group Bank AG and OTP Bank Plc. as the coordinators. The sustainability coordinators for this transaction are Citi and Raiffeisen Bank International AG.

The sustainability targets in the Agreement are aligned with the Shape Tomorrow Strategy of MOL Group and as such the transaction underscores the Group’s commitment to its long-term strategy.

Maturity profile of financial liabilities based on contractual undiscounted payments 31 Dec 2024	Due within 1 month HUF million	Due between 1 and 12 months HUF million	Due between 1 and 5 years HUF million	Due after 5 years HUF million	Total HUF million
Borrowings	128,210	173,785	864,752	130,463	**1,297,209**
Transferred "A" shares with put&call options	-	195,704	-	-	**195,704**
Transferred "A" shares with Total Return Swap	-	21,538	-	-	**21,538**
Trade and other payables	520,510	380,867	-	-	**901,377**
Other financial liabilities	1,065	11,983	2,972	-	**16,019**
Non-derivative financial instruments	**649,785**	**783,877**	**867,723**	**130,463**	**2,431,848**
Derivatives	-	14,750	4,203	-	**18,953**
Total financial liabilities	**649,785**	**798,627**	**871,926**	**130,463**	**2,450,800**
Guarantees	349,357	-	-	-	**349,357**
Undrawn loan commitments**	1,147,152	-	-	-	**1,147,152**
Total Off-balance sheet commitments*	**1,496,509**	**-**	**-**	**-**	**1,496,509**

* the maximum amount of the off-balance sheet commitments is allocated to the earliest period in which they could be called or drawn down

**refers to any potential drawndowns made by MOL Group under available revolving credit facilities

Maturity profile of financial liabilities based on contractual undiscounted payments 31 Dec 2023	Due within 1 month HUF million	Due between 1 and 12 months HUF million	Due between 1 and 5 years HUF million	Due after 5 years HUF million	Total HUF million
Borrowings	69,032	122,571	770,634	174,392	**1,136,629**
Transferred "A" shares with put&call options	-	174,184	-	-	**174,184**
Trade and other payables	522,166	439,800	-	-	**961,966**
Other financial liabilities	3,728	14,736	1,730	-	**20,194**
Non-derivative financial instruments	**594,926**	**751,291**	**772,364**	**174,392**	**2,292,973**
Derivatives	-	16,979	3,412	-	**20,391**
Total financial liabilities	**594,926**	**768,270**	**775,776**	**174,392**	**2,313,364**
Guarantees	350,392	-	-	-	**350,392**
Undrawn loan commitments**	1,054,105	-	-	-	**1,054,105**
Total Off-balance sheet commitments*	**1,404,497**	**-**	**-**	**-**	**1,404,497**

* the maximum amount of the off-balance sheet commitments is allocated to the earliest period in which they could be called or drawn down

**refers to any potential drawndowns made by MOL Group under available revolving credit facilities

b) Sensitivity analysis

In line with the international benchmark, Group Risk Management prepares sensitivity analysis. According to the Financial Risk Management Model, the effect of the key risk elements on clean-CCS-based profit/loss are the following:

Effect on Clean CCS-based* (Current Cost of Supply) profit/(loss) from operation	2024 HUF billion	2023 HUF billion
Brent crude oil price (change by +/- 10 USD/bbl; with fixed crack spreads and petrochemical margin)		
Upstream	+43/-43	+37.8/-37.8
Downstream**	-12.8/12.8	-13.8/+13.8
TTF gas price (change by +/- 15 EUR/MWh; with fixed crack spreads and petrochemical margin)		
Upstream	+69.2/-69.2	+36.4/-36.4
Downstream	-59.7/+59.7	-56.5/+56.5
Gas Midstream	-1.7/+1.7	-2.1/+2.1
Exchange rates (change by +/- 15 HUF/USD; with fixed crack spreads)		
Upstream	+16.6/-16.6	+16.3/-16.3
Downstream**	+27.5/-27.5	+32.9/-32.9
Exchange rates (change by +/- 15 HUF/EUR; with fixed crack spreads/petrochemical margin)		
Upstream	+5.9/-5.9	+5.2/-5.2
Downstream	+18.2/-18.2	+19.2/-19.2
Refinery margin (change by +/- 1 USD/bbl)		
Downstream	+38.8/-38.8	+39.4/-39.4
Integrated petrochemical margin (change by +/- 100 EUR/t)		
Downstream	+42.8/-42.8	+44.1/-44.1
CO2 price EUA (Change by '+/- 10 EUR/t)		
Upstream	-0.6/+0.6	-0.6/+0.6
Downstream	-7.7/+7.7	-8.2/+8.2

*Clean CCS-based profit/(loss) from operation (EBIT) and its calculation methodology is not regulated by IFRS. Please see the reconciliation of reported profit/(loss) from operation (EBIT) and Clean CCS profit/(loss) from operation (Clean CCS EBIT) with the relevant definitions in the Appendix III.

**The Brent and HUF/USD Downstream sensitivity was restated due to methodology change.

c) Borrowings

Accounting policies

All loans and borrowings are initially recognised at the fair value of the consideration received net of issue costs associated with the borrowing. After initial recognition, loans and borrowings are subsequently measured at amortised cost using the effective interest method.

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Long-term debt		
Eurobond €650 million due 2027	264,952	246,830
HUF bond HUF 28,400 million due 2029	28,528	28,552
HUF bond HUF 36,600 million due 2030	35,347	35,151
HUF bond HUF 35,500 million due 2031	35,430	35,425
HUF bond HUF 20,000 million due 2031	20,306	20,257
HRK bond HRK 2,000 million due 2026	108,490	101,094
Schuldschein €130 million due between 2020-2027	8,186	7,630
Bank loans	209,519	254,147
Finance lease liabilities	251,105	182,700
Other	894	1,395
Total long-term debt	**962,757**	**913,181**
Short-term debt		
Eurobond €650 million due 2027	1,038	964
HUF bond HUF 28,400 million due 2029	146	146
HUF bond HUF 36,600 million due 2030	163	161
HUF bond HUF 35,500 million due 2031	494	486
HRK bond HRK 2,000 million due 2026	78	72
Schuldschein €130 million due between 2020-2027	98	11,861
Bank loans	233,458	139,526
Finance lease liabilities	51,924	30,669
Other	2,848	1,516
Total short-term debt	**290,247**	**185,401**
Gross debt (long-term and short-term)	**1,253,004**	**1,098,582**
Cash and cash equivalents	433,610	412,977
Current debt securities	6,711	3,763
Net Debt*	**812,683**	**681,842**
Total equity	**4,659,108**	**4,197,312**
Capital and net debt	**5,471,791**	**4,879,154**
Gearing ratio (%)**	**14.9%**	**14.0%**
Profit from operation	584,872	677,575
Depreciation, depletion, amortisation and impairment	506,442	471,684
Reported EBITDA from continuing operations	1,091,314	1,149,259
Net Debt/Reported EBITDA	**0.74**	**0.59**

*Long-term debt plus Short-term debt less Cash and cash equivalents less Current debt securities, based on the Group's capital management policy the other financial liabilities are not included in the Net Debt calculation
**Net Debt divided by Net Debt plus Total equity.

The analysis of the gross debt of the Group by currencies is the following:

Gross debt by currency	31 Dec 2024 HUF million	31 Dec 2023 HUF million
EUR	781,472	806,092
HUF	233,837	176,711
USD	128,595	34,628
PLN	71,283	46,332
RON	21,169	20,253
CZK	16,579	14,504
Other	69	62
Gross debt	**1,253,004**	**1,098,582**

The following issued bonds were outstanding as of 31 December 2024:

	Ccy	Amount Issued (orig ccy, million)	Amount Issued (million HUF)	Coupon	Type	Cpn Freq	Issue date	Maturity	Issuer
Eurobond	EUR	650	266,559	1.5%	Fixed	Annual	08.10.2020	08.10.2027	MOL Plc.
HRK bond	HRK	2,000	108,857	0.875%	Fixed	Semi-annual	06.12.2021	06.12.2026	INA d.d.*
HUF bond	HUF	28,400	28,400	2.0%	Fixed	Annual	24.09.2019	24.09.2029	MOL Plc.
HUF bond	HUF	36,600	36,600	1.1%	Fixed	Annual	22.09.2020	22.09.2030	MOL Plc.
HUF bond	HUF	35,500	35,500	1.9%	Fixed	Annual	12.04.2021	12.04.2031	MOL Plc.
HUF bond	HUF	20,000	20,000	2.9%	Fixed	Annual	23.06.2021	23.06.2031	ITK Holding Plc.

*The bond was issued in HRK, the amount in EUR is EUR 256 million,EUR/HRK rate is 7,5345

The reconciliation between the Group's total of future minimum lease payments as a lessee and their present value is the following:

	31 Dec 2024		31 Dec 2023	
Leases as a lessee	Minimum lease payments HUF million	Lease liability HUF million	Minimum lease payments HUF million	Lease liability HUF million
Due within one year	61,419	51,924	35,632	30,669
Due later than one year but not later than five years	164,629	157,024	106,236	84,241
Due later than five years	130,293	94,081	124,277	98,459
Total	**356,341**	**303,029**	**266,145**	**213,369**
Future finance charges	53,312	-	52,776	-
Lease liability	**303,029**	**303,029**	**213,369**	**213,369**

The reconciliation between the Group's total of future minimum lease payments as a lessor and their present value is the following:

	31 Dec 2024		31 Dec 2023	
Finance leases as a lessor	Minimum lease payments receivable HUF million	Lease receivable HUF million	Minimum lease payments receivable HUF million	Lease receivable HUF million
Due within one year	3,672	2,558	894	665
Due later than one year but not later than five years	5,770	3,332	3,674	3,071
Due later than five years	2,290	1,788	2,516	1,938
Residual value	-	1,630	-	1,563
Total	**11,732**	**9,308**	**7,084**	**7,237**
Future finance income/(expense)	2,424	-	(153)	-
Lease receivable	**9,308**	**9,308**	**7,237**	**7,237**

For other information on lease agreements please refer to Note 5 and Note 9/a.

d) Equity

Accounting policies

Retained earnings and other reserves shown in the consolidated financial statements do not represent the distributable reserves for dividend purposes. Reserves for dividend purposes are determined based on the reconciliation of MOL Plc.'s equity prepared in accordance with Act C of 2000 on Accounting ("Hungarian Accounting Law").

Reserves of exchange differences on translation

The reserves of exchange differences on translation represents translation differences arising on consolidation of financial statements of foreign entities. Exchange differences arising on such monetary items that, in substance, forms part of the company's net investment in a foreign entity are classified as other comprehensive income in the consolidated financial statements until the disposal of the net investment. Upon disposal of the corresponding assets, the cumulative revaluation or reserves of exchange differences on translation are recognised as income or expenses in the same period in which the gain or loss on disposal is recognised. When a subsidiary that is a foreign operation repays a quasi-equity loan or returns share capital there is a reduction in the parent's absolute ownership interest, the pro rata share of the CTA should be reclassified to profit and loss.

Fair valuation reserves

The fair valuation reserve includes the cumulative net change in the fair value of effective cash flow hedges and financial assets at fair value through other comprehensive income.

Equity component of debt and difference in buy-back prices

Equity component of compound debt instruments includes the residual amount of the proceeds from the issuance of the instrument above its liability component, which is determined as the present value of future cash payments associated with the instrument. The equity component of compound debt instruments is recognised when the Group becomes party to the instrument.

Treasury Shares

The nominal value of treasury shares held is deducted from registered share capital. Any difference between the nominal value and the acquisition price of treasury shares is recorded directly to retained earnings. In order to consistently distinguish share premium and retained earnings impact of treasury share transactions, repurchase and resale of treasury transactions affect retained earnings instead of having impact on share premium.

Share capital

There was no change in the number of issued shares in 2024. As of 31 December 2024, the issued share capital was HUF 102,429 million, consisting of 819,424,824 series "A" shares with par value of HUF 125, one series "B" share with par value of HUF 1,000 and 578 series "C" shares with par value of HUF 1,001. Outstanding share capital as of 31 December 2024 and 31 December 2023 is 79,443 HUF million and HUF 79,192 million, respectively.

Every "A" class share with a par value of HUF 125 each (i.e. one hundred and twenty-five forint) entitles the holder thereof to have one vote and every "C" class share with a par value of 1,001 each (i.e. one thousand one forint) entitles the holder to have eight and eight thousandth vote, with the following exceptions. Based on the Articles of Association, no shareholder or shareholder group may exercise more than 10% of the voting rights with the exception of organisation(s) acting at the Company's request as depository or custodian for the Company's shares or securities representing the Company's shares.

Series "B" shares are voting preference shares with a par value of HUF 1,000 that entitles the holder thereof to preferential rights as specified in the Articles of Association. The "B" series share is owned by MNV Plc. exercising ownership rights on behalf of the Hungarian State. The "B" series share entitles its holder to eight votes in accordance with its nominal value. The supporting vote of the holder of "B" series of share is required to adopt decisions in the following matters pursuant to Article 12.4. of the Articles of Association: decision on amending the articles regarding the B series shares, the definition of voting rights and shareholder group, list of issues requiring supermajority at the general meeting as well as Article 12.4. itself; further, the "yes" vote of the holder of "B" series of shares is required to adopt decisions on any proposal not supported by the Board of Directors in the following matters: election and dismissal of the members of the Board of Directors, the Supervisory Board and the auditors, decision of distribution of profit after-taxation and amending of certain provisions of the Articles of Association.

Based on the authorisation granted in the Article 17.D of the Articles of Association the Board of Directors is entitled to increase the share capital until 24 April 2029 in one or more instalments by not more than HUF 30 billion in any form and method provided by the Civil Code.

Reserves and retained earnings

Between 2023 and 2026 MOL Group plans to spend more than HUF 100 billion on capital expenditures, therefore it created HUF 100 billion development reserve based on the paragraph 7 of Act LXXXI of 1996 on corporate tax and dividend tax, which amount is transferred from the retained earnings to tied-up reserves on 31 December 2022. In 2023 HUF 43,177 million was used up for several projects, the balance of the tied-up reserves is HUF 56,823 million on 31 December 2023. In 2024 HUF 35,743 million was used up for several projects and HUF 18,000 million was transferred from retained earnings to tied-up reserves.

Changes in the number of ordinary, treasury and authorised shares:

Series "A" and "B" shares	Number of shares issued	Number of treasury shares	Shares under repurchase obligation	Shares under retransfer agreement	Number of shares outstanding	Authorised number of shares
1 Jan 2023	**819,424,825**	**35,531,549**	**108,811,618**	**42,977,996**	**632,103,662**	**1,059,424,825**
Share distribution for the members of the Board of Directors and participants of MRP	-	(1,431,297)	-	-	1,431,297	-
Settlement of share option agreement with ING Bank N.V.	-	3,353,987	(3,353,987)	-	-	-
Settlement of share option agreement with Unicredit Bank A.G.	-	3,704,188	(3,704,188)	-	-	-
31 Dec 2023	**819,424,825**	**41,158,427**	**101,753,443**	**42,977,996**	**633,534,959**	**1,059,424,825**
Share distribution for the members of the Board of Directors and participants of MRP	-	(2,002,219)	-	-	2,002,219	-
Settlement of share option agreement with Commerzbank A.G.	-	(6,676,013)	6,676,013	-	-	-
Settlement of share option agreement with ING Bank N.V.	-	(72,931)	72,931	-	-	-
Settlement of share option agreement with Unicredit Bank A.G.	-	(257,634)	257,634	-	-	-
31 Dec 2024	**819,424,825**	**32,149,630**	**108,760,021**	**42,977,996**	**635,537,178**	**1,059,424,825**
Series "C" shares						
1 Jan 2023	**578**	**578**	**-**	**-**	**-**	**578**
31 Dec 2023	**578**	**578**	**-**	**-**	**-**	**578**
31 Dec 2024	**578**	**578**	**-**	**-**	**-**	**578**

The par value of the treasury shares owned by the Group companies is HUF 22,986 million (31 December 2023: HUF 23,236 million).

Dividend

In April 2024 the Board of Directors on behalf of the 2024 Annual General Meeting of MOL Plc. approved to pay HUF 197,959 million dividend in respect of 2023, which equals to HUF 249.98 dividend per share. The total amount of reserves legally available for distribution based on MOL Plc.'s reconciliation of equity is HUF 2,412,820 million as of 31 December 2024.

The approved dividend (HUF 197,959 million) and the dividend shown in the statement of changes in equity (HUF 158,874 million) are different because the following movements are not presented as dividend payments: dividend of shares under retransfer agreement (HUF 10,744 million) represents in substance MOL's contribution to social responsibility activities and therefore charged to the statement of profit or loss; dividend of shares under put and call option, and total return swap transactions (HUF 15,416 million) presented as a decrease in financial liability; dividends of shares in OTP-MOL swap agreement(HUF 10,020 million) presented as change in fair value of derivative instruments, dividend towards MOL Plc.'s Employee Share Ownership Programme Organisation (HUF 2,905 million) has no effect on the statement of financial position because the organisation is consolidated to the group.

Treasury share put and call option transactions

MOL Plc. has two option and one total return swap agreements concluded with financial institutions in respect of 68,676,013 pieces of series "A" shares ("Shares") as of 31 December 2024. Under the option agreements, MOL Plc. holds American call options, and the financial institutions hold European put options in respect of the Shares. The expiry of both the put and call options are identical. (More information about the treasury shares with put&call options are included in Note 21.)

Counterparty	Underlying pieces of MOL ordinary shares	Strike price per share	Expiry
ING Bank N.V.	31,000,000	EUR7.8820	2025.07.04
UniCredit Bank AG	31,000,000	EUR7.51229	2025.07.04
Commerzbank AG	6,676,013	-	2025.07.08

Under the share option agreement executed between ING Bank N.V. ("ING") and MOL on 20 June 2023, MOL on 24 June 2024 acquired 30,927,069 pieces of MOL Series "A" ordinary shares ("Shares"), which got physically settled on 26 June 2024. Following the settlement of option agreements on 24 June 2024, MOL concluded new share sale and derivative agreements on 5 July 2024. Under the share sale and purchase agreement concluded between MOL and ING on 5 July 2024, MOL sold 31,000,000 Shares to ING. Simultaneously, MOL and ING entered into a share option agreement under which MOL receives American call options and ING receives European put options in respect of 31,000,000 Shares. The strike price of both the put and call options is EUR 7.8820, the expiry is 4 July 2025.

Under the share option agreement executed between UniCredit Bank AG and MOL on 20 June 2023, MOL on 24 June 2024 acquired 30,742,366 pieces of MOL Series "A" ordinary shares ("Shares"), which got physically settled on 26 June 2024. Following the settlement of option agreements on 24 June 2024, MOL concluded new share sale and derivative agreements on 5 July 2024. Under the share sale and purchase agreement concluded between MOL and UniCredit Bank GmbH (“UniCredit”) on 5 July 2024, MOL sold 31,000,000 Shares to UniCredit. Simultaneously, MOL and UniCredit entered into a share option agreement under which MOL receives American call options and UniCredit receives European put options in respect of 31,000,000 Shares. The strike price of both the put and call options is EUR 7.51229, the expiry is 4 July 2025.

Under the share sale and purchase agreement concluded between MOL and Commerzbank AG (“Commerzbank”) on 5 July 2024, MOL sold 6,676,013 Series “A” MOL ordinary shares (“Shares”) to Commerzbank. Simultaneously, MOL and Commerzbank entered into a total return swap agreement in respect of 6,676,013 Shares, the expiry is 8 July 2025.

Share swap agreement with OTP

MOL Plc. and OTP entered into a share-exchange and a share swap agreement in 2009. Under the agreements, initially MOL transferred 40,084,008 “A” series MOL ordinary shares to OTP in return for 24,000,000 pieces OTP ordinary shares. The agreement contains settlement provisions in case of certain movement of relative share prices of the parties, subject to net cash or net share settlement. The agreement, concluded on 16 April 2009 and extended on 28 June 2017 was further extended in 2022 until 11 July 2027, which did not trigger any movement in MOL Plc.’s treasury shares. Until the expiration date each party can initiate a cash or physical (i.e. in shares) settlement of the deal.

25. Financial instruments

31 Dec 2024 Carrying amount of financial instruments		Fair value through profit or loss HUF million	Derivatives used for hedging hedge acc.* HUF million	Amortised cost HUF million	Fair value through other comprehensive income HUF million	Total carrying amount HUF million
Financial assets						
Other non-current financial assets	Equity instruments	19,489	-	-	140,762	**160,251**
	Loans given	-	-	7,790	-	**7,790**
	Deposit	-	-	2,294	-	**2,294**
	Finance lease receivables	-	-	6,750	-	**6,750**
	Debt securities	-	-	-	71,263	**71,263**
	Commodity derivatives	812	-	-	-	**812**
	Other derivatives	3,987	-	-	-	**3,987**
	Other	699	-	35,807	-	**36,506**
Total non-current financial assets		**24,987**	**-**	**52,641**	**212,025**	**289,653**
Trade and other receivables		-	-	953,910	-	**953,910**
Cash and cash equivalents		-	-	433,610	-	**433,610**
Debt securities		-	-	-	6,711	**6,711**
Other current financial assets	Commodity derivatives	15,805	-	-	-	**15,805**
	Loans given	-	-	38,961	-	**38,961**
	Deposit	-	-	4	-	**4**
	Finance lease receivables	-	-	2,558	-	**2,558**
	Other derivatives	1,194	-	-	-	**1,194**
	Other	1,580	-	11,161	-	**12,741**
Total current financial assets		**18,579**	**-**	**1,440,204**	**6,711**	**1,465,494**
Total financial assets		**43,566**	**-**	**1,492,845**	**218,736**	**1,755,147**
Financial liabilities						
Borrowings (long-term debt)		-	-	711,653	-	**711,653**
Finance lease liabilities		-	-	251,105	-	**251,105**
Other non-current financial liabilities	Commodity derivatives	919	-	-	-	**919**
	Other derivatives	2,825	-	-	-	**2,825**
	Other	-	-	2,972	-	**2,972**
	Interest rate derivatives	-	459	-	-	**459**
Total non-current financial liabilities		**3,744**	**459**	**965,730**	**-**	**969,933**
Trade and other payables		-	-	901,377	-	**901,377**
Borrowings (short-term debt)		-	-	238,322	-	**238,322**
Finance lease liabilities		-	-	51,924	-	**51,924**
Other current financial liabilities	Transferred "A" shares with put&call options**	-	-	190,782	-	**190,782**
	Transferred "A" shares with Total Return Swap**	-	-	20,995	-	**20,995**
	Commodity derivatives	14,750	-	-	-	**14,750**
	Foreign exchange derivatives	-	-	-	-	**-**
	Other	-	-	13,047	-	**13,047**
Total current financial liabilities		**14,750**	**-**	**1,416,447**	**-**	**1,431,197**
Total financial liabilities		**18,494**	**459**	**2,382,177**	**-**	**2,401,130**

*hedge acc: under hedge accounting
**more information about the transferred "A" shares with put&call options and Total Return Swao is included in Note 20/c

31 Dec 2023 Carrying amount of financial instruments		Fair value through profit or loss HUF million	Derivatives used for hedging hedge acc.* HUF million	Amortised cost HUF million	Fair value through other comprehensive income HUF million	Total carrying amount HUF million
Financial assets						-
Other non-current financial assets	Equity instruments	12,938	-	-	111,827	**124,765**
	Loans given	-	-	63,622	-	**63,622**
	Deposit	-	-	2,156	-	**2,156**
	Finance lease receivables	-	-	6,572	-	**6,572**
	Debt securities	-	-	-	63,269	**63,269**
	Commodity derivatives	1,304	-	-	-	**1,304**
	Other derivatives	2,975	-	-	-	**2,975**
	Other	14,370	-	33,051	-	**47,421**
Total non-current financial assets		**31,587**	**-**	**105,401**	**175,096**	**312,084**
Trade and other receivables		-	-	959,082	-	**959,082**
Cash and cash equivalents		-	-	412,977	-	**412,977**
Debt securities		-	-	-	3,763	**3,763**
Other current financial assets	Commodity derivatives	23,811	-	-	-	**23,811**
	Loans given	-	-	5,480	-	**5,480**
	Deposit	-	-	18	-	**18**
	Finance lease receivables	-	-	665	-	**665**
	Other derivatives	3,806	-	-	-	**3,806**
	Other	10,346	-	20,517	-	**30,863**
Total current financial assets		**37,963**	**-**	**1,398,739**	**3,763**	**1,440,465**
Total financial assets		**69,550**	**-**	**1,504,140**	**178,859**	**1,752,549**
						-
Financial liabilities						
Borrowings (long-term debt)		-	-	730,481	-	**730,481**
Finance lease liabilities		-	-	182,700	-	**182,700**
Other non-current financial liabilities	Commodity derivatives	643	-	-	-	**643**
	Other derivatives	2,454	-	-	-	**2,454**
	Other	-	-	1,730	-	**1,730**
	Interest rate derivatives	-	315	-	-	**315**
Total non-current financial liabilities		**3,097**	**315**	**914,911**	**-**	**918,323**
Trade and other payables		-	-	961,965	-	**961,965**
Borrowings (short-term debt)		-	-	154,732	-	**154,732**
Finance lease liabilities		-	-	30,669	-	**30,669**
Other current financial liabilities	Transferred "A" shares with put&call options**	-	-	169,474	-	**169,474**
	Commodity derivatives	16,933	-	-	-	**16,933**
	Foreign exchange derivatives	46	-	-	-	46
	Other	-	-	18,463	-	**18,463**
Total current financial liabilities		**16,979**	**-**	**1,335,303**	**-**	**1,352,282**
Total financial liabilities		**20,076**	**315**	**2,250,214**	**-**	**2,270,605**

*hedge acc: under hedge accounting
**more information about the transferred "A" shares with put&call options is included in Note 20/c

The Group does not have any instrument where the Group chose the fair value option to designate an instrument upon initial recognition at fair value through profit or loss in order to reduce a measurement or recognition inconsistency. The Group does not have any financial instrument whose classification has changed as a result of amendments in business model categorisation.

The Group elected upon initial recognition to measure investments in equity instruments at fair value through other comprehensive income, as these instruments are not held for trading. Investments in venture funds are measured at fair value through profit or loss.

After the receipt of the necessary regulatory approvals, on 25 April 2024, MOL acquired 2,654,061 “A” series ordinary shares in Waberer`s International Plc., representing a 15.00% ownership interest. The shares were recognised at the acquisitions date fair value among other non-current financial assets. The shares are not held for trading, so the Group elected upon initial recognition to measure the investments at fair value through other comprehensive income. The market value of the shares amounted to HUF 10,590 million as of 31 December 2024.The other significant equity instrument is JANAF interest held by INA d.d., the company that owns and operates the Adria pipeline system. The market value of the shares as of 31 December 2024 amounted to HUF 40,212 million (31 December 2023: HUF 37,761 million). Both of the fair value is calculated using available market prices and is considered level 1 among the fair value hierarchy.

The most significant items among debt securities are bonds issued by listed entities and banks. For the changes in the other comprehensive income due to the valuation of debt instruments please refer to Note 8.

The Group uses several valuation techniques to determine the fair value of the financial instruments. The fair value of commodity derivatives is determined based on the present value of estimated future cash flows using observable forward prices.

The fair value of debt instruments is calculated by discounting the present value of estimated future cash flows with observable zero coupon bond yield curves adjusted with issuer-specific credit risk factors.

The fair values of financial instruments measured at amortised cost approximate their carrying amounts except for the issued bonds. The fair value of the issued bonds is HUF 449,175 million, while their carrying amount is HUF 494,972 million as of 31 December 2024 (31 December 2023: fair value was HUF 403,830 million, carrying amount was HUF 469,138 million). HUF 253,436 million of the fair value of the issued bonds is categorised as Level 1 and HUF 195,739 million is categorised as Level 2. The Level 1 fair value is determined by the latest observed mid market prices available from an external market data vendor, while in case of Level 2 fair value the prices are defined by the external data vendor using a benchmark yield with an additional estimated spread.

Impairment only accounted for on trade receivables and loans given. No impairment is recognised on the remaining financial instruments based on materiality, history, expectations and change in credit risk.

Contract assets and contract liabilities from contracts with customers are not material for the Group.

The carrying amount of hedging instruments designated in hedge accounting programmes are the followings:

Carrying amounts of hedging instrument			**2024** HUF million	**2023** HUF million
Net investment hedge	Liabilities	Borrowings	451,451	487,827
Cash flow hedge	Liabilities	Interest rate derivatives	459	315

Hedge of net investments in foreign operations

The Group has EUR denominated net investments in foreign operations and EUR denominated borrowings. These borrowings are being used to hedge the Group's exposure to EUR foreign exchange risk on these investments. Gains or losses on the retranslation of this borrowing are transferred to other comprehensive income to offset any gains or losses on translation of the net investments in the subsidiaries. There is an economic relationship between the hedged items and the hedging instruments as the net investments creates a translation risk that will match the foreign exchange risk on the borrowings. The Group has established a hedge ratio of 1:1 as the underlying risk of the hedging instrument is identical to the hedged risk component. The hedge ineffectiveness will arise when the amount of the investment in the foreign subsidiary becomes lower than the amount of the borrowing.

The notional amount of the EUR denominated borrowings are EUR 1,100 million. (31 December 2023: EUR 1,274 million). The weighted average hedged rates, where the weight is the balance of the hedging instrument, for the year are 395.4 HUF/EUR (31 December 2023: 382 HUF/EUR)

The movements of the currency translation reserve due to net investment hedging are the following:

Net investment in foreign operation	Notes	**2024** HUF million	**2023** HUF million
Opening Balance of the foreign currency translation reserve due to hedging, net of tax		**166,562**	**185,188**
Change in value of hedged item used to determine hedge effectiveness		25,412	(26,256)
Change in carrying amount of borrowings as a result of foreign currency movements recognised in other comprehensive income	8	(25,412)	26,256
Change in foreign currency translation reserve due to hedging, net of tax	8	19,557	(18,626)
Closing Balance of the foreign currency translation reserve due to hedging, net of tax		**186,119**	**166,562**

The hedging gain recognised in other comprehensive income before tax is equal to the change in fair value used for measuring effectiveness. There was no ineffectiveness to be recorded from net investments in foreign entity hedges.

26. Fair value measurement of financial instruments

Fair value hierarchy	31 Dec 2024 Level 1 Unadjusted quoted prices in active markets HUF million	Level 2 Valuation techniques based on observable market input HUF million	Level 3 Valuation techniques based on unobservable input HUF million	Total fair value HUF million	31 Dec 2023 Level 1 Unadjusted quoted prices in active markets HUF million	Level 2 Valuation techniques based on observable market input HUF million	Level 3 Valuation techniques based on unobservable input HUF million	Total fair value HUF million
Financial assets								
Equity instruments	50,801	109,450	-	**160,251**	37,761	87,004	-	**124,765**
Debt securities	-	77,974	-	**77,974**	-	67,032	-	**67,032**
Commodity derivatives	-	16,617	-	**16,617**	-	25,115	-	**25,115**
Other derivatives	-	5,181	-	**5,181**	-	6,781	-	**6,781**
Other	-	-	2,279	**2,279**	-	-	24,716	**24,716**
Total financial assets	**50,801**	**209,222**	**2,279**	**262,302**	**37,761**	**185,932**	**24,716**	**248,409**
Financial liabilities								
Commodity derivatives	-	15,669	-	**15,669**	-	17,576	-	**17,576**
Foreign exchange derivatives	-	-	-	**-**	-	46	-	**46**
Other derivatives	-	2,825	-	**2,825**	-	2,454	-	**2,454**
Interest rate derivatives	-	459	-	**459**	-	315	-	**315**
Total financial liabilities	**-**	**18,953**	**-**	**18,953**	**-**	**20,391**	**-**	**20,391**

Other financial assets (both current and non-current) relate to the disposal of MOL's UK portfolio and INA's Angolan portfolio which are classified as a financial asset and measured at fair value through profit or loss. The fair values of these considerations are considered level 3 valuation inputs under the fair value hierarchy. On 4 June, 2024 MOL received default notice from WPL, the counterparty to MOL in the 2022 sale of MOL's entire UK E&P portfolio and the earn-out consideration was fully written down in June 2024. The write-off is presented as discontinued operation in the statement of profit and loss, for more information please refer to Note 19.

The fair value of the Angolan Block 3/05 earn-out consideration is determined by multiplying the average daily Brent price exceeding a pre-agreed Brent price and the number of produced oil barrels for the companies' percentage interest under the relevant Joint Operation Agreements and Production Sharing Agreement. Cash flows are estimated based on inputs including quoted Brent price and production volumes related to the disposed operations. The fair value of the consideration is determined by the restart of the production on each Punja and Caco-Gazela field together with reaching the predetermined threshold production. Future cash flows are estimated based on best estimation on when production will restart and when threshold would be reached.

The following table shows the changes in the value of level 3 financial assets for the period ended at 31 December 2024:

	2024 HUF million	2023 HUF million
Opening Balance	**24,716**	**55,413**
Increase due to new sale	-	1,714
Decrease due to payments received	-	(27,331)
Gains/losses arising during the year	2,580	(5,080)
Write-off	(25,017)	-
Closing Balance	**2,279**	**24,716**

Quantitative sensitivity analysis for the changes in unobservable inputs

- A 10% increase in the Brent oil price would result in an increase of the contingent assets in the amount of HUF 150 million, while a 10% decrease in the Brent oil price would result in a decrease of the contingent assets in the amount HUF 280 million.
- A 1 percentage point increase in the discount rate would result in a decrease of the contingent assets in the amount of HUF 3 million, and a 1 percentage point decrease in the discount rate would result in an increase of the contingent asset in the amount of HUF 3 million.
- A 10% increase in production would result in an increase of the contingent assets in the amount of HUF 68 million, a 10% decrease in production would result in a decrease of the contingent asset in the amount of HUF 68 million.

27. Trade and other receivables

Accounting policies

Trade and other receivables are amounts due from customers for goods sold and services performed in the normal course of business, as well as other receivables such as margining receivables.Trade receivables are recognised at transaction price if they do not contain a significant financing component . A provision for impairment is made for full-lifetime expected credit losses using the simplified approach.The Group calculates the expected credit loss on trade receivables as the average of yearly historical loss rates of the last three years multiplied by the forward-looking element. The forward-looking element is based on positive correlation between banking sector credit losses and one year lag of unemployment rate. Impaired receivables are derecognised when they are assessed as uncollectible.

If collection of trade receivables is expected within the normal business cycle which is one year or less, they are classified as current assets. In other cases, they are presented as non-current assets.

Trade and other receivables	**31 Dec 2024** HUF million	**31 Dec 2023** HUF million
Trade receivables	788,908	766,199
Other receivables	165,002	192,883
Total	**953,910**	**959,082**

Trade receivables	**31 Dec 2024** HUF million	**31 Dec 2023** HUF million
Trade receivables (gross)	803,986	775,991
Loss allowance for receivables	(15,078)	(9,792)
Total	**788,908**	**766,199**

The gross amount of trade receivables increased mainly due to the increase in the sales volume and increase on the receivables due to acquisitions of new entities (MOHU Zrt.). The reason for the increase in impairment is that the MOHU Zrt. has recognised a loss allowance for overdue receivables.

Movements in the loss allowance for receivables	**2024** HUF million	**2023** HUF million
At 1 January	**9,792**	**13,605**
Additions	8,477	2,185
Reversal	(3,004)	(4,881)
Amounts written off	(724)	(853)
Foreign exchange differences	537	(264)
At 31 December 2023	**15,078**	**9,792**

	31 Dec 2024		**31 Dec 2023**	
Ageing analysis of trade receivables	Gross book value HUF million	Net book value HUF million	Gross book value HUF million	Net book value HUF million
Not past due	**717,291**	**714,860**	**719,384**	**718,457**
Past due	**86,695**	**74,048**	**56,607**	**47,742**
Within 180 days	63,781	62,626	47,767	46,666
Over 180 days	22,914	11,422	8,840	1,076
Total	**803,986**	**788,908**	**775,991**	**766,199**

Current assets pledged as security

The carrying amount of currents assets pledged as security for liabilities is HUF 6,186 million as of 31 December 2024 (2023: HUF 1,228 million).

28. Cash and cash equivalents

Accounting policies

Cash includes cash on hand and cash at banks. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and that are subject to an insignificant risk of change in value. The Group considers the term “insignificant risk of change in value” not being limited to three-month period.

	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Short-term bank deposits	192,514	192,048
Demand deposit	221,712	186,925
Cash on hand	19,384	34,004
Total	**433,610**	**412,977**

Cash and cash equivalents pledged as security

The carrying amount of cash and cash equivalents pledged as security for liabilities is HUF 12,785 million as of 31 December 2024 (2023: HUF 13,047 million).

UNDRAWN LOAN COMMITMENTS

This section includes additional financial information that are either required by the relevant accounting standards or management considers these to be material information for shareholders.

29. Commitments and contingent liabilities

Accounting policies

Contingent liabilities are not recognised in the consolidated financial statements unless they are acquired in a business combination. They are disclosed in the Notes unless the possibility of an outflow of resources embodying economic benefits is remote. A contingent asset is not recognised in the consolidated financial statements but disclosed when an inflow of economic benefits is probable.

a) Guarantees

The total contractual value of bank guarantees, letters of credit and other commitments to parties outside the Group and equity consolidated investments is HUF 349,357 million (31 December 2023: HUF 350,392 million).

b) Capital and Contractual Commitments

The total amount of capital and contractual commitments of the fully consolidated companies as of 31 December 2024 is HUF 270,061 million (31 December 2023: HUF 276,866 million), of which HUF 106,079 million relate to Croatian operations, HUF 88,291 million to operations in Hungary and HUF 22,591 million to operations in Slovakia.

MOL is committed to transforming the refining business and increasing the competitiveness of the Rijeka refinery (HUF 56,977 million). The investment will make the Croatian refinery one of the most modern in Europe and will increase the share of profitable "white" products, i.e., motor fuels, to better serve market needs. Other large commitments in Croatia are linked to the development project for the Irena gas fields in the Adriatic Sea (HUF 13,308 million).

The MOL Group's most significant commitments in the upstream area are for the drilling and completion of new wells, de-risking wells with a 4D seismic programme and covering annual work programme (HUF 53,101 million).

In Hungary, MOL has taken on an important responsibility in the field of waste management. The hazardous waste incineration project aims to ensure that the Danube Refinery will have a reliable and efficient hazardous waste incinerator that complies with all relevant regulations for the coming decades (HUF 22,689 million). MOL is committed to increasing and expanding the efficiency of the circular economy by supporting recycling through a number of innovative solutions, including the selective collection and proper treatment of household kitchen green and food waste, and the modernization of waste collection (HUF 5,179 million).

MOL has further investment obligations in Hungary related to the installation of a photovoltaic power plant near the Algyő Gas Plant (HUF 9,736 million), the capacity expansion of the maleic anhydride unit of the Danube Refinery (HUF 8,993 million), the completion of the petrochemical polyol project (HUF 4,379 million) and the implementation of a metathesis project (HUF 3,531 million).

In Slovakia, the largest investment commitments relate to the upgrading of a steam cracker unit to increase its capacity (HUF 9,988 million).

As part of its corporate social responsibility, the MOL Group has made commitments of HUF 546 million through sponsorship agreements for the next three years.

c) Unrecognised lease commitments

Unrecognised lease commitments*	31 Dec 2024 HUF million	31 Dec 2023 HUF million
Due within one year	2,340	1,888
Due later than one year but not later than five years	928	849
Total	**3,267**	**2,737**

*Lease commitments for short-term leases and leases of low-value assets

d) Authority procedures, litigation

General

None of the litigations described below have any impact on the accompanying consolidated financial statements except as explicitly noted. MOL Group entities are parties to a number of civil actions arising in the ordinary course of business. Currently, no further litigation exists that could have a material adverse effect on the financial condition, assets, results or business of the Group.

The value of litigation where members of the MOL Group act as defendant is HUF 20,558 million for which HUF 3,411 million provision has been made.

ICSID arbitration (MOL Plc. vs. Croatia)

The International Centre for Settlement of Investment Disputes (ICSID) delivered its verdict in the arbitration case between the Republic of Croatia and MOL Plc. on the 5 July 2022. MOL filed a request for arbitration against Croatia in 2013 for breaching contractual obligations on multiple occasions under the agreements signed between the parties in 2009 mainly concerning gas trading. The ICSID award clearly states that Croatia's bribery related allegations are unfounded. The three-member council unanimously rejected Croatia's objection that the 2009 agreements were a result of criminal conduct. Similarly, to the UNCITRAL Tribunal in 2016, this international judicial forum also characterized the story of the Croatian criminal proceedings' crown witness as weak and full of contradictions. Furthermore, the court expressed strong doubts about the truthfulness and reliability both in the arbitral and criminal proceedings in Zagreb.

According to the ruling of the arbitration tribunal Croatia caused substantial damages to INA, and thus indirectly to MOL by failure to take over the gas trading business of INA as well as by breaching contractual obligations of natural gas pricing and royalty rate increases, thus awarding MOL with damages in the amount of USD 167.8 million. The tribunal awarded a further USD 16.1 million in damages caused by Croatia by forcing the sale of stored natural gas of INA's subsidiary (Prirodni Plin). Together with interest MOL was awarded a total of around USD 236 million in damages. In 2023 an enforcement procedure was initiated due to non-payment of the awarded amount. The contingent asset has not been recognised in the Statement of Financial Position.

BELVEDERE, INA No Nš-14/17

In July 2017 INA received a lawsuit from Belvedere d.d. Dubrovnik with a claim of HRK 220 million. The claim relates to a loan provided by INA in 2005 to Belvedere d.d. (hotel "Belvedere" in Dubrovnik served as security for the loan). Since Belvedere d.d. has not returned the loan, enforcement procedure was initiated in 2012, and the hotel was sold to a highest bidder on a public auction. Belvedere d.d. now claims that the hotel was sold below its market value and also claims damage to its reputation and loss of profit.

Although the outcome of this procedure is uncertain it is more likely in favour of INA than not. Notwithstanding the possible outcome, request for the damage is deemed to set too high considering three independent court experts already discussed the market price issue. Case is interrupted until resolution of case INA No. 018-11/17 which represents preliminary issue for resolving this case. In case INA No. 018-11/17 final decision was reached in favour of INA. Plaintiff filled proposal for permission to file a revision as an extraordinary legal remedy and the Supreme Court of the Republic of Croatia rejected the proposal.

Case Nš-14/17 will now continue but the hearing date is not yet scheduled.

BELVEDERE, INA No 018-11/23 and No 018-14/23

In June 2023, INA received two new claims from BELVEDERE d.d., where BELVEDERE d.d. is trying to establish INA loan agreement concluded in year 2005 and Real Estate Sales Contract concluded in year 2014 to be null and void. INA delivered a reply fully rejecting both BELVEDERE's claims.

In the case regarding the loan agreement the first instance court rejected the claim. The plaintiff filed an appeal against the subject decision. The case regarding the Real Estate Sales Contract is ongoing before the first instance court.

Nova Natura d.o.o.

The plaintiff filed a lawsuit for damages in the total amount of EUR 1,853,087.50 caused by the impossibility of using part of the agricultural land for agricultural production due to the defendant's underground pipelines buried on the land. In the lawsuit, the plaintiff states that the defendant has the right of easement, however, it never carried out the expropriation procedure and did not pay any compensation for the use of the land, neither to the plaintiff, nor to its predecessors. In its response, the defendant disputed the grounds and the claimed amount and suggested the intervention of company Plinacro d.o.o. in the litigation, since its pipelines also pass through the land in question. The defendant has valid use and construction permits for the pipelines in question and alleged that the plaintiff must have been aware of the pipelines. On December 6, 2023, a first-instance verdict was issued, whereby the claim was rejected in its entirety. The plaintiff filed an appeal against the judgment in question, which was rejected by a second-instance court. After the finality of the second instance decision, the plaintiff submitted an extraordinary legal remedy - a motion for permission to file a revision, to which INA responded. The Supreme Court rejected (and in some part dismissed) the plaintiff's motion for permission to file a revision.

RSG Europe Service Centre Limited

The lawsuit was filed on August 4, 2021 by the plaintiff as the insurer of the ship operator of ship FIDELITY, against defendants INA and its subcontractor MANŠPED. The plaintiff claims compensation for damages (recourse) for the total amount paid according to the settlements it concluded with the Republic of Croatia, the County of Istria and other legal and natural persons due to the damages that (allegedly) occurred to them as a result of the fuel spill from the ship FIDELITY into the sea in the Raša Bay on June 22, 2018. The plaintiff paid an advance for the litigation costs (EUR 236,536) according to the Act on Private International Law. The main hearing was held on December 4, 2023, the officers of the Port Authority of Pula were heard, who stated that there were problems in the communication between the fuel loader and the ship's crew, which was also aggravated by the bad weather, and that they did not do everything necessary to prevent pollution, but confirmed that all the fuel passed the point at the ship's bunker station after which all risk passes to the shipowner. The judge ordered that an expert report be conducted on the circumstances of the cause of the accident. The report (from 19.10.2024) concluded that (regardless of any omission of other persons involved) the ship's crew caused the fuel spill.

Ivana D (State Inspectorate, Sector for Supervision of Mining, Energy and Pressure Equipment, Supervision in the field of energy)

The State Inspectorate, on June 26, 2023 filed an indictment against the first defendant INA, d.d. and the second defendant Nikola Mišetić for allegedly committing two violations in relation to the Law on Safety in Offshore Exploration and Hydrocarbon Exploitation. The grounds for the Indictment is the Decision of the State Inspectorate, which became enforceable on September 22, 2021, allowing a deadline of one year to remove the exploitation facilities Ivana D. It is not disputed that the facilities were not removed.

However, it is questionable whether there was an obligation to remove the facilities, given that the platform sank due to an accident and given the statements of the Ministry of Economy from which it follows that an environmental impact study must be carried out before removing the platform.

The State Inspectorate, the Independent Service for Second-instance Proceedings, is to decide on the Appeal after the expiry of the deadline against the disputed Decision ordering the removal, which Appeal has not been decided on by the date of this Report.

Dispute value: 1. Violation: €66,361 – 10% of the offender's total income (fine for a legal entity, and €19,908 – €66,361 for the responsible person) 2. Violation: €3,980 – €15,920 (fine for a legal entity, and €390 – €2,650 for the responsible person)

On 18 April 2024 a verdict was issued by which INA and Nikola Mišetić were acquitted of the first offense (that we acted contrary to Article 15.1 of the Law on Offshore Investigation Safety and exploitation of hydrocarbons - if INA had not carried out oil mining rehabilitation works that would have removed the construction of the platform) while in relation to the second offense (failure to act according to the executive decision) INA were found guilty and a fine of €10,000 was imposed for INA and €1,500 in relation to Mr. Mišetić. The State Inspectorate filed an appeal against the verdict and decision on the appeal is pending.

Dispute with OMV over the calculation of the Final Purchase Price

In June 2023, the parties closed the transaction in which OMV sold its shares in OMV Slovenija (now MOL&INA d.o.o.) to MOL. In January 2024, OMV indicated in connection with the post-closing calculation of the Final Purchase Price, that it claims an additional EUR 23 million as a purchase price adjustment from MOL, due to certain movements in the working capital and cash balance of the target company prior to closing.

On 22 May 2024, OMV initiated arbitration proceedings to enforce its claim by submitting a Request for Arbitration against MOL Slovenia Downstream Investments B.V. before the International Chamber of Commerce (ICC) in Zurich. MOL maintains that OMV's request contravenes the parties' original intentions and that OMV has breached the share sale and purchase agreement on several occasions in order to increase the effect of balance sheet movements which OMV now seeks to benefit from.

Muamer V. et al. v. ENERGOPETROL, case number 65 0 Rs 704245 18 Rs

In 2018, in the case Muamer V. et al. v. ENERGOPETROL, case number 65 0 Rs 704245 18 Rs, a total of 387 employees filed a lawsuit against the company ENERGOPETROL, seeking payment of salary differences for the period from November 2014 to May 2018.

In November 2021, the first-instance court rendered a decision in favour of the company ENERGOPETROL. Following the judgment, the plaintiffs filed an appeal against the first-instance decision. As of July 2022, the case remains pending before the second-instance court.

Given that the outcome of the case Muamer V. et al. v. ENERGOPETROL, case number 65 0 Rs 704245 18 Rs, was entirely contingent upon the resolution of the case Muhamed H. et al. v. ENERGOPETROL, case number 65 0 Rs 301741 12 Rs, which was resolved in favour of the company ENERGOPETROL, the reserves for the Muamer V. et al. v. ENERGOPETROL case were released from the company's accounts.

The total value of the dispute amounts to € 9.2 million as principal, € 7.3 million in taxes and contributions, along with statutory default interest at the rate of 10% per year on the principal amount.

e) Environmental liabilities

MOL Group's operations are subject to the risk of liability arising from environmental damage or pollution and the cost of any associated remedial work. MOL Group is currently responsible for significant remediation of past environmental damage relating to its operations. Accordingly, MOL Group has established a provision of HUF 74,542 million for the estimated cost as at 31 December 2024 for probable and quantifiable costs of rectifying past environmental damage (see Note 16). In addition, a provision of HUF 6,154 million was recorded to cover an expected intervention where the timing, cost and nature of the intervention is still uncertain. Although the management believes that these provisions are sufficient to satisfy such requirements to the extent that the related costs are reasonably estimable, future regulatory developments or differences between known environmental conditions and actual conditions could cause a revaluation of these estimates.

Some of the Group's premises may be affected by contamination where the cost of rectification is currently not quantifiable or legal requirement to do so is not evident. The main case where such contingent liabilities may exist is the Tiszaújváros site, including both the facilities of MOL Petrochemicals Plc. and the area of MOL's Tisza refinery, where the Group has identified significant underground water and subsurface soil contamination. In accordance with the resolutions of the regional environmental authorities combined for MOL Petrochemicals and MOL Group, the Group completed a detailed investigation and submitted the results and technical specifications to the authorities in July 2021. Based on these documents the authorities brought a resolution on 7 September 2021 requiring MOL Petrochemicals and MOL Group to jointly perform this plan in order to manage the soil and underground water contamination. The total amount of liabilities originating from this plan can be estimated properly and MOL Petrochemicals and MOL Group set the required amount of environmental provision.

Contingent liabilities exist for uncertain remediation tasks; their magnitude cannot be estimated currently, but it is not expected to exceed HUF 4,000 million.

The technology applied in oil and gas exploration and development activities by the Group's Hungarian predecessor before 1995 may give rise to future remediation of drilling mud produced (in 1995 there was modification in the drilling technology). In accordance with legal requirements the treatment (extraction and disposal) of the resulting pollutant is required. The potential expenses associated with such an obligation depend on the extent, volume and composition of the drilling mud left behind at the various production sites. According to current estimates the amount of the environmental liability is HUF 1,118 million.

Further to more detailed site investigations to be conducted in the future and the advancement of national legislation or authority practice, additional contingent liabilities may arise at the industrial park around Mantova refinery which has been acquired in previous business combinations. As at 31 December 2024, on Group level the amount of environmental liabilities, recorded in the statement of financial position is HUF 20,717 million (31 December 2023: HUF 19,337 million).

30. Notes to the consolidated statements of cash flows

Accounting policies

Bank overdrafts repayable on demand are included as component of cash and cash equivalent in case where the use of short-term overdrafts forms an integral part of the entity's cash management practices.

The Group has classified cash payments for the principal portion of lease payments and cash payments for the interest portion of lease payments as financing activities.

Analysis of net cash outflow on acquisition of subsidiaries, joint operations as business combinations	2024 HUF million	2023 HUF million
Cash consideration	(36,596)	(122,168)
Cash at bank or on hand acquired	35,772	6,238
Net cash outflow on acquisition of subsidiaries, joint operations	**(824)**	**(115,930)**

Analysis of net cash flow related to sale of subsidiaries, joint operations as business combinations	2024 HUF million	2023 HUF million
Cash consideration	398	46,286
Cash at bank or on hand disposed	(130)	(58)
Net cash inflow/(outflow) related to sale of subsidiaries, joint operations	**268**	**46,228**

Analysis of increas/decrease in other financial assets	2024 HUF million	2023 HUF million
Change of escrow account of decommissioning	2,435	2,505
Bought/sold bonds	(9,260)	5,599
Net change of given loans	11,766	2,604
Other changes	(9,402)	8,522
Total change in other financial assets	**(4,461)**	**19,230**

Analysis of cash flow related to joint ventures and associates	2024 HUF million	2023 HUF million
Cash consideration of acquisition and capital increase	(1,360)	(8,887)
Dividend from joint ventures and associates	19,272	4,471
Net movements of loans	(365)	8,537
Total	17,547	4,121

Analysis of other items	2024 HUF million	2023 HUF million
Fair value change - commodity	12,335	(9,011)
Write-off of inventories, net	17,917	9,142
Write-off of receivables, net	58,253	9,099
Other non-highlighted items	235	(1,714)
Total	**88,740**	**7,516**

	01 Jan 2024 balance	Cash flows used in financing activities	Non-cash changes						31 Dec 2024 balance
			Acquisitions/ Disposals	Realised and non-realised FX	FV change on derivatives	Accrued Interest	New lease liabilities	Non-financing CF related movements	
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
Long-term debt	913,181	**(148,382)**	69,828	(428)	-	38,319	90,240	-	962,758
Other non-current financial liabilities	5,142	**(423)**	-	939	-	-	-	1,517	7,175
Short-term debt	185,401	**7,584**	-	79,712	-	14,733	-	2,816	290,246
Other current financial liabilities	204,916	**28,115**	-	13,758	(1,816)	-	-	(5,399)	239,574
Total Cash flows used in financing activities from financial liabilities	-	**(113,106)**	-	-	-	-	-	-	-
Other items impacting Cash flows used in financing activities	-	**(217,203)**	-	-	-	-	-	-	-
Total Cash flows used in financing activities	-	**(330,309)**	-	-	-	-	-	-	-

The Other items impacting Cash flows used in financing activities, HUF 243,155 million is the paid dividend to shareholders from retained earnings.

31. Earnings per share

Accounting policies

Basic earnings per share are calculated by dividing the net profit for the period attributable to ordinary shareholders by the weighted average number of ordinary shares outstanding during the period, after deduction of the average number of treasury shares held over the period.

The calculation of diluted earnings per share is consistent with the calculation of basic earnings per share taking into consideration all dilutive potential ordinary shares that were outstanding during the period:

- the net profit for the period attributable to ordinary shares is increased by the after-tax number of dividends and interest recognised in the period in respect of the dilutive potential ordinary shares and adjusted for any other changes in income or expense that would result from the conversion of the dilutive potential ordinary shares.
- the weighted average number of ordinary shares outstanding is increased by the weighted average number of additional ordinary shares which would have been outstanding assuming the conversion of all dilutive potential ordinary shares.

	Income HUF million	Weighted average number of shares	Earnings/(Loss) per share HUF
Basic Earnings Per Share cont.op. 2023	530,367	741,337,396	715,42
Diluted Earnings Per Share cont.op. 2023	530,367	741,337,396	715,42
Basic earnings per share attributable to owners of the parent (HUF) discont.op. 2023	(449)	741,337,396	(0,61)
Diluted earnings per share attributable to owners of the parent (HUF) discont.op. 2023	(449)	741,337,396	(0,61)
Basic Earnings Per Share 2023	529,918	741,337,396	714,81
Diluted Earnings Per Share 2023	529,918	741,337,396	714,81
Basic Earnings Per Share cont.op. 2024	368,158	741,964,078	496
Diluted Earnings Per Share cont.op. 2024	368,158	741,964,078	496
Basic earnings per share attributable to owners of the parent (HUF) discont.op. 2024	(40,893)	741,964,078	(55.11)
Diluted earnings per share attributable to owners of the parent (HUF) discont.op. 2024	(40,893)	741,964,078	(55.11)
Basic Earnings Per Share 2024	327,265	741,964,078	441.08
Diluted Earnings Per Share 2024	327,265	741,964,078	441.08

The diluted earnings per share differs from the basic earnings per share due to dilutive effect of outstanding number of shares with conversion option in equity-settled share-based payment and cash-settled share-based payment programmes. There was no that kind of programme in 2023 and 2024.

32. Related party transactions

a) Transactions with associated companies and joint ventures

	2024 HUF million	2023 HUF million
Trade and other receivables due from related parties	6,320	8,851
Long-term loans given to related parties	7,316	55,350
Long-term receivables from related parties due to finance lease	5,201	5,830
Short-term loans given to related parties	38,058	157
Short-term receivables from related parties due to finance lease	696	665
Trade and other payables due to related parties	25,568	18,444
Long-term liabilities to related parties due to finance lease	2,463	2,862
Short-term liabilities to related parties due to finance lease	661	538
Net sales to related parties	38,494	40,448
Other expenses from impairment of receivables due from related parties	-	-
Finance expenses from impairment of receivables due from related parties	3,241	5,407

The Group purchased and sold goods and services with associated companies and joint ventures during the ordinary course of business in 2024 and 2023. All of the transactions were conducted under market prices and conditions.

b) Remuneration of the members of the Board of Directors

Directors' remuneration approximated HUF 153 million in 2024 (2023: HUF 156 million). In addition, the directors participate in a long-term incentive scheme details of which are given in Note 4.

Directors are remunerated with the following net amounts in addition to the incentive scheme:

Executive and non-executive directors	25,000 EUR/year
Committee chairmen	31,250 EUR/year

In case the position of the Chairman is not occupied by a non-executive director, it is the non-executive vice Chairman who is entitled to this payment. Directors who are not Hungarian citizens and do not have permanent address in Hungary are provided with EUR 1,500 on each Board meeting (maximum 15 times a year) when travelling to Hungary.

c) Number of shares held by the members of the Board of Directors, Chief Executives' Committee and the Management

	2024 number of shares	2023 number of shares
Board of Directors	6,050,637	4,972,405
Executives' Committee and Supervisory Board (except Board of Directors members)	250,000	250,000
Senior Management (except Board of Directors, Executives' Committee, Supervisory Board members)	166,142	19,618
Total	**6,466,779**	**5,242,023**

d) Transactions with Management, officers and other related parties

In 2024 entities controlled by the members of key management personnel purchased fuel and other retail services from MOL Group in the total value of HUF 5,009 million (2023: HUF 4,458 million). MOL Group provided subsidies through sponsorship for sport organisations controlled by key management personnel in the total value of HUF 459 million (2023: HUF 720 million). MOL Group purchased other services (including business operations related and other services) from companies controlled by key management personnel in the total value of HUF 3,711 million (2023: HUF 3,462 million). All of the transactions were conducted under market prices and conditions.

Entities controlled by key management personnel hold 4,112,378 shares (2023: 3,793,145 shares).

e) Key management compensation

The amounts disclosed contain the compensation of managers who qualify as a key management member of MOL Group.

	2024 HUF million	2023 HUF million
Salaries and wages	1,197	1,204
Other short-term benefits	518	421
Share-based payments	977	553
Total	**2,692**	**2,178**

f) Loans to the members of the Board of Directors and Supervisory Board

No loans have been granted to key management personnel.

33. Events after the reporting period

a) Slovnaft special levy

As part of the measures within the consolidation package for the recovery of public finances, a proposal to amend the law on the special levy in regulated areas in Slovakia has been introduced with an effective date of January 1, 2025. The list of regulated entities which are subject of the special levy will include Slovnaft a.s., as a company that manufactures petroleum products. The regulated entities will be obligated to pay the 2.5 % levy rate from January 2025 on a monthly basis (i.e., 30% annual rate). According to the current law, the levy base is the profit before tax multiplied by coefficient. The coefficient is calculated as a share of income from regulated activities from the total income. Special levy is deductible from the CIT base.

34. Appendices

a) Appendix I.: Issued but not yet effective International Financial Reporting Standards and Amendments

At the date of authorisation of these financial statements, the following standards and interpretations were in issue but not yet effective:

- New and revised Standards and Interpretations issued by IASB and adopted by the EU but not yet effective:
  - IFRS 1 First Adoption of International Financial Reporting Standards (issued on 18th of July 2024, effective 1st of January 2026);
  - IFRS 10 “Consolidated Financial Statements” (issued July 18, 2024, effective January 1, 2026);
- Standards and Interpretations issued by IASB but not yet adopted by the EU:
  - IFRS 18 Presentation and Disclosure in Financial Statements (issued on 9th of April 2024, effective 1st January 2027);
  - IFRS 19 Subsidiaries Without Public Accountability: Disclosures (issued on 9th of May 2024, effective 1st of January 2027);
  - IFRS 9 - Amendments to financial instruments (issued 30th of May 2024, effective 1st of January 2026);
  - IFRS 7 Financial Instruments: Disclosures (issued July 18, 2024, effective January 1, 2026);
  - IAS 7 Statement of Cash Flows (issued July 18, 2024, effective January 1, 2026);
  - IFRS 9 - Amendments to financial instruments (issued December 30, 2024, effective January 1, 2026);
  - IFRS 7 Financial Instruments: Disclosures (issued December 18, 2024, effective January 1, 2026).

MOL is in the process of evaluating the impact of these amendments. They are not expected to have a significant effect on future financial reporting.

b) Appendix II.: Subsidiaries

Company name	Country (Incorporation/Branch)	Range of activity	Ownership 2024	Ownership 2023
Integrated subsidiaries				
INA-Industrija nafte d.d.	Croatia	Integrated oil and gas	49%	49%
Upstream				
Adriagas S.r.l.	Italy	Pipeline project company	49%	49%
Csanád Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
EMSZ Első Magyar Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
Kalegran B.V.	Netherlands	Exploration financing	100%	100%
Kalegran B.V Erbil Branch Office	Iraq	Exploration and production	100%	100%
KMSZ Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MH Oil and Gas BV.	Netherlands	Investment management	100%	100%
MNS Oil and Gas B.V.	Netherlands	Exploration financing	100%	100%
MOL Bázakerettye Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Bucsa Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Crossroads B.V.	Netherlands	Exploration financing	100%	100%
MOL Azerbaijan Ltd.	Bermuda	Exploration and production	100%	100%
MOL Dráva Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL (FED) Kazakhstan B. V. - Head office	Netherlands	Exploration financing	100%	100%
MOL (FED) Kazakhstan B.V. - Branch office	Kazakhstan	Investment management	100%	100%
MOL Nordsjön B.V. [3]	Netherlands	Exploration financing	-	100%
MOL Nyírség-Dél Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Nyírség-Észak Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Okány-Nyugat Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Őrség Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL RBS Holding Ltd. [2]	Hungary	Exploration financing	100%	-
MOL RBS Operator Ltd. [2]	Hungary	Exploration financing	60%	-
MOL RBS S.r.l. [2]	Romania	Exploration and production	60%	-
MOL Pakistan Oil and Gas Co. B.V. - Head Office	Netherlands	Exploration financing	100%	100%
MOL Pakistan Oil and Gas Co. B.V. - Branch Office	Pakistan	Exploration and production	100%	100%
MOL-RUSS Ooo.	Russia	Management services	100%	100%
MOL Somogyvámos Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL SZMDK Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
MOL Zala-Nyugat Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
Panfora Oil and Gas S.r.l.	Romania	Exploration and production	100%	100%
Tápió Szénhidrogén Koncessziós Ltd.	Hungary	Exploration and production	100%	100%
Gas-Midstream				
FGSZ Földgázszállító Plc.	Hungary	Natural gas transmission	100%	100%
Circular Economy				
Greenpet Recycle Ltd. [2]	Hungary	Waste Management	100%	-
MOHU Budapest Ltd. [2]	Hungary	Waste Management	50%	-
MOHU Holding Ltd.	Hungary	Investment management	100%	100%
NHSZ Észak-KOM Nonprofit Ltd.	Hungary	Waste Management	94%	94%
NHSZ Gyöngyösi Reg. Hulladékkezelő Ltd.	Hungary	Waste Management	98%	98%
NHSZ Mátra Hulladékkezelő Nonporfit Ltd.	Hungary	Waste Management	99%	99%
MOHU Miskolc Ltd. (former: NHSZ Miskolc Ltd.)	Hungary	Waste Management	100%	100%
NHSZ Tatabánya Plc.	Hungary	Waste Management	67%	67%
NHSZ Vértes Vidéke HG Nonprofit Ltd.	Hungary	Waste Management	65%	65%
NHSZ Tapolca Nonprofit Ltd.	Hungary	Waste Management	96%	96%
NHSZ Csobánc Ltd.	Hungary	Waste Management	96%	96%
NHSZ TISZA Nonprofit Ltd.	Hungary	Waste Management	77%	77%
MOHU MOL Hulladékgazdálkodási Plc.	Hungary	Waste Management	100%	100%
MOL Körforgásos Gazdálkodás Ltd.	Hungary	Waste Management	100%	100%
RE-POL Innovációs Termelő és Ker. Ltd. [2]	Hungary	Rubber waste handling,	56%	-
Vivienvíz Ltd. [2]	Hungary	Mineral water production and	100%	-
Downstream				
Aufwind Schmack Első Biogáz Ltd.	Hungary	Biogas production	100%	100%
Croplin, d.o.o.	Croatia	Natural gas trading	49%	49%
IES S.p.A.	Italy	Refinery and marketing of oil	100%	100%
Panta Distribuzione S.r.l.	Italy	Trading of oil products	100%	100%
INA d.o.o.	Serbia	Trading of oil products	49%	49%
INA Kosovo d.o.o.	Kosovo	Trading of oil products	49%	49%
INA Maziva Ltd.	Croatia	Lubricants production and	49%	49%
Leodium Investment Ltd.	Hungary	Financial services	100%	100%
MOL Austria GmbH	Austria	Wholesale trade of lubricants	100%	100%
Roth Energie GmbH	Austria	Trading of oil products	100%	100%
MOL Commodity Trading Ltd.	Hungary	Financial services	100%	100%
MOL Germany GmbH	Germany	Trading of oil products	100%	100%
Aurora Kunststoffe GmbH	Germany	Plastic compounding	100%	100%
Aurora Kunststoffe Walldürn GmbH [5]	Germany	Plastic compounding	-	100%
Aurora Kunststoffe VS GmbH [5]	Germany	Plastic compounding	-	100%
MOL Kunststoff Ltd.	Hungary	Investment management	100%	100%
MOL-LUB Ltd.	Hungary	Production and trade of	100%	100%
MOL Petrolkémia Plc.	Hungary	Petrochemical production and	100%	100%
Tisza-WTP Ltd. 1	Hungary	Feed water and raw water	0%	0%
TVK-Erőmű Ltd.	Hungary	Electricity production and	100%	100%
MOL REMA Holding Ltd.	Hungary	Investment management	100%	100%
Recrea Asset Management Plc.	Hungary	Business management	100%	100%
ReMat Hulladékhasznosító Plc.	Hungary	Recycling and wholesale of	100%	100%
ReMat Slovakia s.r.o.	Slovakia	Recycling and wholesale of	100%	100%
MOL Slovenia Downstream Investment B.V.	Netherlands	Investment management	100%	100%
Moltrans Ltd.	Hungary	Transportation services	100%	100%
MOLTRADE-Mineralimpex Plc.	Hungary	Importing and exporting of	100%	100%
MOL CZ Downstream Investment B.V.	Netherlands	Investment management	100%	100%
MOL Ukraine LLC	Ukraine	Wholesale and retail trade	100%	100%
OLAJTERV Tervező Plc.	Hungary	Engineering activity	100%	100%

Company name	Country (Incorporation/Branch)	Range of activity	Ownership 2024	Ownership 2023
SLOVNAFT a.s.	Slovakia	Refinery and marketing of oil	100%	100%
Dalby a.s.	Slovakia	Wholesale and retail trade	100%	100%
Slovnaft Polska S.A.	Poland	Wholesale and retail trade	100%	100%
Slovnaft Trans a.s.	Slovakia	Transportation services	100%	100%
Vúrup a.s.	Slovakia	Research and development	100%	100%
Terméktároló Plc.	Hungary	Oil product storage	74%	74%
Zväz pre skladovanie zásob a.s.	Slovakia	Wholesale and retail trade,	100%	100%
Consumer Services				
Energopetrol d.d.	Bosnia and Herzegovina	Retail trade	44%	44%
Fresh Corner Restaurants Holding Ltd.	Hungary	Investment management	100%	100%
Fresh Corner Restaurants Ltd.	Hungary	Catering services	100%	100%
Holdina d.o.o.	Bosnia and Herzegovina	Trading of oil products	49%	49%
INA Crna Gora d.o.o.	Montenegro	Trading of oil products	49%	49%
INA Maloprodajni servisi d.o.o.	Croatia	Trade agency in the domestic	49%	49%
INA Slovenija d.o.o.	Slovenia	Trading of oil products	49%	49%
MOL Česká republika s.r.o.	Czech Republic	Wholesale and retail trade	100%	100%
MOL Fleet Holding Ltd.	Hungary	Investment management	100%	100%
MOL Mercarius Holding Ltd. [2]	Hungary	Investment management	34%	-
MOL Fleet Solution Flottakezelő Ltd.	Hungary	Fleet management	100%	100%
Mercarius Flottakezelő Ltd. [2]	Hungary	Fleet management	34%	-
Mercarius Mercar Ltd. [2]	Hungary	Fleet management	34%	-
MOL & INA d.o.o.	Slovenia	Trading of oil products	100%	100%
MOL Limitless Mobility Holding Ltd.	Hungary	Investment management	100%	100%
MOL Limitless Mobility Ltd.	Hungary	Car sharing	100%	100%
MOL Polska sp. z o.o.	Poland	Retail sale of fuel for motor	100%	100%
MOL Retail Holding Ltd.	Hungary	Real estate management	100%	100%
MOL Kiskereskedelmi Ingatlan Ltd.	Hungary	Real estate management	100%	100%
MOL Romania PP s.r.l.	Romania	Retail and wholesale trade of	100%	100%
MOL Serbia d.o.o.	Serbia	Retail trade of fuels and	100%	100%
MOL Slovenia d.o.o.	Slovenia	Retail trade of fuels and	100%	100%
Slovnaft Mobility Services, s.r.o.	Slovakia	Rental services	100%	100%
Tifon d.o.o.	Croatia	Retail trade of fuels and	100%	100%
Corporate and other				
FER Tűzoltó és Szolgáltató Ltd.	Hungary	Fire services	100%	100%
Geoinform Ltd.	Hungary	Hydrocarbon exploration	100%	100%
Hostin d.o.o.	Croatia	Tourism	49%	49%
INA Industrijski servisi d.o.o.	Croatia	Investment management	49%	49%
Crosco Naftni Servisi d.o.o.	Croatia	Oilfield services	49%	49%
Crosco S.A. DE C.V	Mexico	Maintaining services	49%	49%
Crosco Ukraine Llc.	Ukraine	Oilfield services	49%	49%
Rotary Plc.	Hungary	Oilfield services	49%	49%
Plavi Tim d.o.o.	Croatia	IT services	49%	49%
STSI integrirani tehnički servisi d.o.o.	Croatia	Repairs and maintenance	49%	49%
INA Vatrogasni Servisi d.o.o.	Croatia	Firefighting services	49%	49%
MOL Aréna Ltd.	Hungary	Investment management	100%	100%
MOL Biztonsági Szolgáltatások Ltd.	Hungary	Security services	100%	100%
MOL CVC Investment Ltd.	Hungary	Investment management	100%	100%
MOL E-mobilitás Vagyonkezelő Ltd.	Hungary	Investment management	100%	100%
ITK Holding Plc.	Hungary	Investment management	94%	94%
Inter Traction Electrics Ltd.	Hungary	Motor vehicle manufacturing	94%	94%
Inter Tan-Ker Plc.	Hungary	Passenger transportation	94%	94%
Inter Tan-Ker City Ltd.	Hungary	Passenger transportation	94%	94%
Inter-Traffic Management Ltd.	Hungary	Renting and operating of	94%	94%
ITE Bus & Truck Kereskedelmi Ltd.	Hungary	Vehicle sales and aftersales	94%	94%
Pandant TMSZ Ltd.	Hungary	Security services	94%	94%
MOL GBS Magyarország Ltd.	Hungary	Accounting services	100%	100%
MOL GBS Slovensko s.r.o.	Slovakia	Accounting services	100%	100%
MOL Group Finance Plc.	Hungary	Investment management	100%	100%
MOL Group International Services B.V.	Netherlands	Financial and accounting	100%	100%
MOL Ingatlan Holding Ltd.	Hungary	Investment management	100%	100%
MOL Campus Ltd.	Hungary	Real estate management	100%	100%
MOL C.F. Ltd.	Hungary	Real estate management	100%	100%
MOL Investment Ltd.	Hungary	Financial services	100%	100%
MOL IT & Digital GBS Magyarország Ltd.	Hungary	IT services	100%	100%
MOL IT & Digital GBS Slovensko, s.r.o.	Slovakia	IT services	100%	100%
MOL IT Holding Ltd.	Hungary	Investment management	100%	100%
MOL Magyarország Társasági Szolgáltató Ltd.	Hungary	Company services	100%	100%
MOL Reinsurance Co. DAC	Ireland	Captive insurance	100%	100%
MOL RES Investments Plc.	Hungary	Geothermal energy production	100%	100%
MOL Solar Energy Holding Ltd.	Hungary	Business services	100%	100%
MOL Solar Operator Ltd.	Hungary	Power production	100%	100%
Naperőmű Farm Ltd. [2]	Hungary	Power production	100%	-
MOL Transportation Services Ltd.	Hungary	Transportation services	100%	100%
MOL Vagyonkezelő Ltd.	Hungary	Investment management	100%	100%
LEAD Ventures Alapkezelő Plc. [2]	Hungary	Venture capital fund	100%	-
Új Lila Labdarúgó Ltd. [2]	Hungary	Investment management	100%	-
Újpest 1885 Futball Ltd. [2]	Hungary	Other sport activities	100%	-
Újpest Labdarúgó Akadémia Ltd. [2]	Hungary	Other sport activities	100%	-
Neptunus Investment Ltd.	Hungary	Investment management	100%	100%
Fonte Viva Ltd.	Hungary	Mineral water production and	100%	100%
Petrolszolg Ltd.	Hungary	Repairs and maintenance	100%	100%
Slovnaft Montáže a opravy a.s.	Slovakia	Repairs and maintenance	100%	100%
MOL Industrial Services Investment Ltd.	Hungary	Investment management	100%	100%
ISO-SZER Ltd.	Hungary	Construction services	100%	100%
KVV Plc.	Hungary	Pipeline construction	100%	100%
Top Računovodstvo Servisi d.o.o.	Croatia	Accounting services	49%	49%
TVK Ingatlankezelő Ltd. [4]	Hungary	Real estate management	-	100%

1) Fully consolidated because MOL Petrolkémia Plc. and TVK Erőmű Ltd. is the only costumer of Tisza-WTP Ltd.; 2) Fully consolidated from 2024; 3) Liquidated in 2024; 4) Merged to MOL Petrolkémia Plc. in 2024; 5) Merged to Aurora Aurora Kunststoffe GmbH

c) Appendix III.: Clean CCS profit/(loss) from operation (Clean CCS EBIT)

Clean CCS-based profit/(loss) from operation and its calculation methodology is not regulated by IFRS. CCS stands for Current cost of supply. Clean CCS EBIT is the most closely watched earnings measure in the oil and gas industry as it best captures the underlying performance of a refining operation as it removes non-recurring special items, inventory holding gains and losses, impairment on raw materials, purchased finished products and own-produced inventory and derivative transactions.

Inventory holding gain/loss

EBIT after excluding the inventory holding gain/loss reflects the actual cost of supplies of the analysed period therefore it provides better portray on the underlying production and sales results and makes the results comparable to other companies in the industry.

Impairment on inventory

Inventories must be measured at the lower of cost or net realisable value.

The cost of inventories must be reduced - i.e., impairment must be recognised on closing inventory of the period- if the cost is significantly higher than the expected sales price minus cost to sell.

In case of finished products, impairment should be recognised if the closing value of the inventory at the end of period is above the future sales price of the product minus cost to sell. In case of raw materials and semi-finished products that will be used further in production, it has to be examined whether, following their use in production; their value can be recovered in the selling price of the produced finished products. If their value is not fully recoverable impairment must be recognised to the recoverable level.

Derivative transactions

CCS methodology is based on switching to period average crude oil prices, but the CCS effect together with the effect of commodity derivative transactions would lead to unnecessary duplication, therefore the P&L effect of commodity derivatives are eliminated, except for the results of strategic hedges and rotation transactions.

CO2 adjustment

CO2 adjustment revaluates provisions created in Downstream operation for CO2 consumption above freely allocated quotas, as defined in accounting policy. This adjustment ensures the accurate cost recognition for the given period in the clean CCS result, also including the smoother distribution within the financial year. It consequently eliminates rolled-over impacts between financial years, too.

Non-recurring special items

One-off items are single, significant (more than USD 10 million P&L effect), non-recurring economic events which are not considered as part of the core operation of the segment therefore they do not reflect the actual performance of the given period.

Clean CCS profit/(loss) from operation reconciliation	2024 HUF million	2023 HUF million
Profit from operation	**584,872**	**677,575**
Inventory holding gain/(loss)	20,912	400
Impairment on raw materials and own-produced inventory	(2,767)	(8,249)
- thereof affects raw materials	(523)	351
- thereof affects own-produced inventory	(2,036)	(8,534)
- thereof affects purchased goods/products inventory	(209)	(65)
Cargo commodity derivatives	14,054	(1,799)
CO2 adjustment	719	(2,030)
CCS profit from operation	**617,790**	**665,897**
Impact of derivative transactions	(2,534)	(13,410)
Other Clean adjustment	-	(245)
Special items	18,952	45,226
Clean CCS profit from operation	**634,208**	**697,468**

Special items	2024 HUF million	2023 HUF million
Profit from operation excluding special items	**603,824**	**722,801**
Upstream		
Impairment on Upstream assets in the Group	(18,952)	(3,654)
MOL Plc. Decommissioning liability revision estimate	-	16,904
INA Decommissioning liability revision estimate	-	8,648
Total special items in Upstream	**(18,952)**	**21,898**
Consumer services		
Impairment of Retail assets	-	(61,257)
Total special items in Consumer services	**-**	**(61,257)**
Corporate and Other		
ITK Goodwill impairment	-	(5,867)
Total special items in Corporate and Other	**-**	**(5,867)**
Total impact of special items on profit from operation	**(18,952)**	**(45,226)**
Profit from operation	**584,872**	**677,575**

d) Appendix IV.: Additional presentations according to the Hungarian Accounting Law

Person responsible for supervising transactional accounting and preparation of IFRS financial statements

Name: Ervin Berki
Registration number: 195106 (IFRS specialisation)

Person required to sign the statement of responsibility

Name: József Molnár, Group Chief Executive Officer
Address: HU – 1165 Budapest, Hunyadvár utca 42.

Name: József Simola, Group Chief Financial Officer
Address: HU – 1112 Budapest, Ördögorom út 3/C A ép. 1.

Contacts

Company name: MOL Plc.
Registered address: HU – 1117 Budapest, Dombóvári út 28.
Official website: www.molgroup.info

Presentation of company controls

In accordance with paragraph 89 of the Hungarian Accounting Law the financial statements include the itemised list of the name, registered address and voting percentage of all business associations in which the company has majority control according to the provisions of the Civil Code governing business associations. See Appendix II.

There is no such company which holds majority control or qualified majority control in MOL Plc.

Audit fees

In accordance with paragraph 133 of the Hungarian Accounting Law the financial statements include the total fees for the financial year charged by the auditor or audit firm for the audit of consolidated accounts and for non-audit services. The fee charged by the audit firm (Deloitte Könyvvizsgáló és Tanácsadó Ltd.) for the statutory audit of the 2024 consolidated and separate financial statements of MOL Plc. is HUF 122,1 million. The auditor including its network charged HUF 430 million for other assurance and audit-related services, HUF 0 million for tax advisory services and HUF 0 million for other non-audit-related services to MOL Plc. and its subsidiaries for 2024 excluding fees for statutory audits of annual financial statements. The Company is required to be audited pursuant to paragraph 155 (2) of the Hungarian Accounting Law. The annual accounts and the consolidated annual accounts of the parent company, together with the independent auditor's report, are sent electronically to the company information service.

e) Appendix V.: Presentation of licensed activities

Act LXXXVI of 2007 on Electricity (hereafter “Vet.”) stipulates that an integrated electricity enterprise and an enterprise holding several licenses shall present its various licensed activities independently in the notes of its consolidated financial statements. Separate presentation of licensed activities - in the case of several licensed activities of the same type - means accumulated separate statement of financial position and accumulated statement of profit or loss.

Government Decree No. 273/2007 (X.19.) provide for the implementation of the Act.

Act XL of 2008 on Natural Gas (hereafter “Get.”) stipulates that an integrated natural gas enterprise and an enterprise holding several licenses shall present its various licensed activities independently in the notes of its consolidated financial statements. Separate presentation of licensed activities - in the case of several licensed activities of the same type - means accumulated separate statement of financial position and accumulated statement of profit or loss.

Government Decree No. 19/2009 (I.30.) provide for the implementation of the Act.

Separation method

The separation method is described in the relevant internal policies of the companies. Short description of the policies presented in the below tables.

Companies prepares the activity separation annually.

In case of the separation of the statement of financial position, the individual activity statements of financial position are not closed on their own at certain companies. Any differences are presented on the “Technical income/(expense) for the period” line in conformance with official guidelines.

	STATEMENT OF PROFIT OR LOSS 2024									
				Electricity					**Natural gas**	
	MOL Plc.	**TVK-Erőmű Kft.**	**MOL Solar Operátor Kft.**	**MOHU Budapest Zrt.**	**FONTE VIVA Kft.**	**Aufwind Schmack Első Biogáz Kft.**	**Total**	**FGSZ Földgázszállító Zrt.**	**MOL Commodity Trading Kft.**	**Total**
	Trading			**Manufacturing**				**Transportation**	**Trading**	
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
Net sales	110,230	7,711	1,868	1,469	-	1,926	**123,204**	125,557	210,980	**336,537**
Other operating income	514	-	3	-	12	1	**530**	2,034	(4)	**2,030**
Total operating income	**110,744**	**7,711**	**1,871**	**1,469**	**12**	**1,927**	**123,734**	**127,591**	**210,976**	**338,567**
Raw materials and consumables used	106,090	4,864	296	760	-	1,188	**113,198**	26,685	209,202	**235,887**
Employee benefits expense	85	-	-	401	-	192	**678**	9,933	-	**9,933**
Depreciation, depletion, amortisation and impairment	431	327	626	601	27	336	**2,348**	18,806	-	**18,806**
Other operating expenses	(393)	36	36	5	-	34	**(282)**	4,993	100	**5,093**
Change in inventory of finished goods and work in progress	-	-	-	-	-	(5)	**(5)**	-	-	**-**
Work performed by the enterprise and capitalised	(477)	-	-	-	-	-	**(477)**	(2,723)	-	**(2,723)**
Total operating expenses	**105,736**	**5,227**	**958**	**1,767**	**27**	**1,745**	**115,460**	**57,694**	**209,302**	**266,996**
Profit/(Loss) from operation	**5,008**	**2,484**	**913**	**(298)**	**(15)**	**182**	**8,274**	**69,897**	**1,674**	**71,571**
Finance income	(770)	69	241	6	-	5	**(449)**	315	573	**888**
Finance expense	29	51	54	42	-	187	**363**	6,138	29	**6,167**
Total finance income/(expense)	**(799)**	**18**	**187**	**(36)**	**-**	**(182)**	**(812)**	**(5,823)**	**544**	**(5,279)**
Profit/(Loss) before tax	**4,209**	**2,502**	**1,100**	**(334)**	**(15)**	**-**	**7,462**	**64,074**	**2,218**	**66,292**
Income tax income/(expense)	-	(152)	(115)	-	-	(51)	**(318)**	(7,234)	-	**(7,234)**
Profit/(Loss) for the year	**4,209**	**2,350**	**985**	**(334)**	**(15)**	**(51)**	**7,144**	**56,840**	**2,218**	**59,058**

	STATEMENT OF FINANCIAL POSITION 31 Dec 2024									
			Electricity						Natural gas	
	MOL Plc.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FONTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	Total	FGSZ Földgázszállító Zrt.	MOL Commodity Trading Kft.	Total
	Trading			Manufacturing				Transportation	Trading	
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
NON-CURRENT ASSETS										
Property, plant and equipment	2,139	1,909	7,898	9,053	549	4,639	**26,187**	274,179	-	**274,179**
Investment property	-	-	-	-	-	-	**-**	-	-	**-**
Intangible assets	-	-	-	-	-	-	**-**	5,180	-	**5,180**
Investments	-	-	-	-	-	-	**-**	-	-	**-**
Other non-current financial assets	-	133	3,004	-	-	-	**3,137**	3,821	-	**3,821**
Deferred tax asset	-	-	-	17	-	-	**17**	-	-	**-**
Other non-current assets	18	-	1,767	-	-	-	**1,785**	33	-	**33**
Total non-current assets	**2,157**	**2,042**	**12,669**	**9,070**	**549**	**4,639**	**31,126**	**283,213**	**-**	**283,213**
CURRENT ASSETS										
Inventories	447	40	29	124	-	120	**760**	7,054	-	**7,054**
Trade and other receivables	15,703	1,071	309	625	-	216	**17,924**	3,301	9,189	**12,490**
Securities	-	-	-	-	-	-	**-**	-	-	**-**
Other current financial assets	-	-	-	2	-	-	**2**	-	7,851	**7,851**
Income tax receivable	-	381	-	-	-	-	**381**	-	-	**-**
Cash and cash equivalents	-	61	-	429	-	46	**536**	6,579	3,805	**10,384**
Other current assets	19,434	18	17	820	-	194	**20,483**	2,208	-	**2,208**
Assets classified as held for sale	-	-	-	-	-	-	**-**	-	-	**-**
Total current assets	**35,584**	**1,571**	**355**	**2,000**	**-**	**576**	**40,086**	**19,142**	**20,845**	**39,987**
Total assets	**37,741**	**3,613**	**13,024**	**11,070**	**549**	**5,215**	**71,212**	**302,355**	**20,845**	**323,200**
EQUITY										
Share capital	312	659	105	5,933	-	9	**7,018**	18,719	41	**18,760**
Retained earnings and other reserves	1,740	-	10,083	(140)	340	2,332	**14,355**	108,334	4,429	**112,763**
Profit/(Loss) for the year	4,209	2,350	985	(334)	(15)	(51)	**7,144**	56,840	2,218	**59,058**
Technical income/(expense) for the period	20,828	(390)	-	-	-	-	**20,438**	(368)	(1,725)	**(2,093)**
Total equity	**27,089**	**2,619**	**11,173**	**5,459**	**325**	**2,290**	**48,955**	**183,525**	**4,963**	**188,488**
NON-CURRENT LIABILITIES										
Long-term debt	-	-	284	2,536	-	-	**2,820**	48,121	-	**48,121**
Other non-current financial liabilities	-	-	-	503	-	22	**525**	-	-	**-**
Non-current provisions	-	-	-	142	-	-	**142**	4,386	-	**4,386**
Deferred tax liabilities	-	-	215	-	-	-	**215**	21,625	-	**21,625**
Other non-current liabilities	764	-	-	-	208	-	**972**	11,582	-	**11,582**
Total non-current liabilities	**764**	**0**	**499**	**3,181**	**208**	**22**	**4,674**	**85,714**	**0**	**85,714**
CURRENT LIABILITIES										
Short-term debt	-	-	12	379	-	2,629	**3,020**	1,102	-	**1,102**
Trade and other payables	6,719	994	1,283	1,130	-	52	**10,178**	11,458	15,882	**27,340**
Other current financial liabilities	-	-	26	62	-	-	**88**	8,746	-	**8,746**
Current provisions	-	-	-	-	-	-	**-**	1,640	-	**1,640**
Income tax payable	-	-	31	-	-	-	**31**	3,639	-	**3,639**
Liabilities classified as held for sale	-	-	-	-	-	-	**-**	-	-	**-**
Other current liabilities	3,169	-	-	859	16	222	**4,266**	6,531	-	**6,531**
Total current liabilities	**9,888**	**994**	**1,352**	**2,430**	**16**	**2,903**	**17,583**	**33,116**	**15,882**	**48,998**

Total liabilities	**10,652**	**994**	**1,851**	**5,611**	**224**	**2,925**	**22,257**	**118,830**	**15,882**	**134,712**
Total equity and liabilities	**37,741**	**3,613**	**13,024**	**11,070**	**549**	**5,215**	**71,212**	**302,355**	**20,845**	**323,200**

	Method of activity separation in the statement of profit or loss							
	MOL Plc.	**TVK-Erőmű Kft.**	**MOL Solar Operátor Kft.**	**MOHU Budapest Zrt.**	**FONTE VIVA Kft.**	**Aufwind Schmack Első Biogáz Kft.**	**FGSZ Földgázszállító Zrt.**	**MOL Commodity Trading Kft.**
Net sales	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	-	Distributed from net sales	Can be allocated directly to activities	Can be allocated directly to the activities
Other operating income	Can be allocated directly to the activities and adding company level other incomes attributed in proportion of the net sales revenue	-	Can be allocated directly to the activities	-	Analytics	Distributed from net sales (except green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Based on item-by-item inspection
Raw materials and consumables used	Can be allocated directly to the activities and adding company level cost of raw materials in proportion of the net sales revenue	Distributed in proportion to net sales revenue, except of the contracted services, which are distributed in proportion of fixed assets	Can be allocated directly to the activities	Can be allocated directly to the activities, indirect expenses are distributed upon naturalia	-	Distributed from net sales (except green certificate)	Can be allocated directly to activities	Based on item-by-item inspection
Employee benefits expense	Directly attributable employee benefits expenses in proportion of the headcount	-	-	Can be allocated directly to the activities, and indirect expenses are distributed upon naturalia	-	Distributed from net sales (except green certificate)	Distributed based on cost-centre classification of people	-
Depreciation, depletion, amortisation and impairment	Directly attributable depreciation in proportion of the headcount allocated to the activity	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities, and indirect expenses are distributed upon naturalia	Analytics	-	Distributed based on cost-centre classification of assets or in proportion to the direct asset	-
Other operating expenses	Directly attributable other operating expenses and adding company level other operating expenses in proportion of the headcount and the net sales revenue	Distributed in proportion to net sales revenue, except of the directly attributable authority fees and the insurance fees, which are distributed in proportion of fixed assets	Can be allocated directly to the activities	Can be allocated directly to the activities, and indirect expenses are distributed upon naturalia	-	Distributed from net sales (except green certificate)	Can be allocated directly to activities	Based on item-by-item inspection
Change in inventory of finished goods and work in progress	-	-	-	-	-	Distributed from net sales (except green certificate)	-	-
Work performed by the enterprise and capitalised	Directly attributable work performed by the enterprise and capitalise in proportion of the headcount and the net sales revenue	-	-	-	-	-	Can be allocated directly to activities	-
Finance income	Distributed in proportion to net sales revenue	Distributed in proportion to net sales revenue	Can be allocated directly to the activities	Distributed in proportion to costs	-	Distributed from net sales (except green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Based on item-by-item inspection
Finance expense	Distributed in proportion to net sales revenue	Distributed in proportion to net sales revenue	Can be allocated directly to the activities	Distributed in proportion to costs	-	Distributed from net sales (except green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Based on item-by-item inspection
Income tax income/(expense)	-	Distributed in proportion to net sales revenue, except of the	Can be allocated directly to the activities	Calculated from modified net sales	-	Distributed from total net sales	Distributed in proportion to profit before tax	-

		directly attributable industrial tax						

	Method of activity separation in the statement of financial position							
	MOL Plc.	**TVK-Erőmű Kft.**	**MOL Solar Operátor Kft.**	**MOHU Budapest Zrt.**	**FONTE VIVA Kft.**	**Aufwind Schmack Első Biogáz Kft.**	**FGSZ Földgázszállító Zrt.**	**MOL Commodity Trading Kft.**
Property, plant and equipment	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Analytics	Analytics	Distributed based on cost-centre classification of assets	-
Investment property	-	-	-	-	-	-	-	-
Intangible assets	-	-	-	Can be allocated directly to the activities	-	-	Distributed based on cost-centre classification of assets or in proportion to the direct asset	-
Investments	-	-	-	-	-	-	-	-
Other non-current financial assets	-	Can be allocated directly to the activities	Can be allocated directly to the activities		-	-	Based on item-by-item inspection	Based on item-by-item inspection
Deferred tax asset	-	-	-	Distributed in proportion to intangible assets, fixed assests and trade and other recievables	-	-	-	-
Other non-current assets	-	-	Can be allocated directly to the activities	-	-	-	Based on item-by-item inspection	-
Inventories	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Distributed in proportion to intangible assets, fixed assests and trade and other recievables	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-
Trade and other receivables	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	-	Analytics	Can be allocated directly to activities	Based on item-by-item inspection
Securities	-	-	-	-	-	-	-	-
Other current financial assets	-	-	-	Distributed in proportion to intangible assets, fixed assests and trade and other recievables	-	-	-	-
Income tax receivable	-	Distributed in proportion to fixed assets, except of the directly attributable industrial tax	-	-	-	-	-	-
Cash and cash equivalents	-	Distributed in proportion of fixed assets	-	Distributed in proportion to intangible assets, fixed assests and trade and other recievables	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	Based on item-by-item inspection
Other current assets	Directly attributable other current assets and adding company level other current assets in proportion of the employee benefit expenses	Distributed in proportion to fixed assets, except of the directly attributable industrial tax	Can be allocated directly to the activities	Distributed in proportion to intangible assets, fixed assests and trade and other recievables	-	-	It is divided in proportion to the direct asset	-
Assets classified as held for sale	-	-	-	-	-	-	-	-

	Method of activity separation in the statement of financial position							
	MOL Plc.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FONTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	MOL Commodity Trading Kft.
Share capital	Distributed in proportion of related assets	Distributed in proportion of fixed assets	Can be allocated directly to the activities	Distributed in proportion of related assets	-	Distributed from net sales (except green certificate)	Opening balance sheet in proportion to fixed assets	Distributed in proportion of related assets
Retained earnings and other reserves	Distributed in proportion of related assets	-	Can be allocated directly to the activities	Distributed in proportion of related assets	Analytics	Distributed from net sales (except green certificate)	Based on item-by-item inspection	Distributed in proportion of related assets
(Loss) / Profit for the year attr to owners of parent	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Can be allocated directly to the activities	Activity breakdown of profit and loss account	Calculated earnings after-tax	Activity breakdown of profit and loss account	Can be allocated directly to the activities
Technical income/(expense) for the period	Value ensuring equality between allocated assets and liabilities and shareholder's equity	Value ensuring equality between allocated assets and liabilities and shareholder's equity	-	Can be allocated directly to the activities	-	-	Provides accounting equation	Value ensuring equality between allocated assets and liabilities and shareholder's equity
Long-term debt	-	-	Can be allocated directly to the activities	Distributed in proportion of related assets	-	-	It is divided in proportion to the direct asset	-
Other non-current financial liabilities	-	-	-	Distributed in proportion of related assets	Analytics	Distributed from net sales (except green certificate)	-	-
Non-current provisions	-	-	-	Distributed in proportion of related assets	-	-	It is divided in proportion to the direct asset	-
Deferred tax liabilities	-	-	Can be allocated directly to the activities	-	-	-	It is divided in proportion to the direct asset	-
Other non-current liabilities	Can be allocated directly to the activities	Distributed in proportion of fixed assets	-	-	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-
Short-term debt	-	-	Can be allocated directly to the activities	Distributed in proportion of related assets	-	Value ensuring equality between allocated assets and liabilities and shareholder's equity	It is divided in proportion to the direct asset	-
Trade and other payables	Can be allocated directly to the activities	Distributed in proportion to net sales revenue	Can be allocated directly to the activities	Distributed in proportion of related assets	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	Based on item-by-item inspection
Other current financial liabilities	-	-	Can be allocated directly to the activities	Distributed in proportion of related assets	-	-	It is divided in proportion to the direct asset	-
Current provisions	-	-	-	-	-	-	It is divided in proportion to the direct asset	-
Income tax payable	-	-	Can be allocated directly to the activities	-	-	-	Distributed in proportion to profit before tax	-

Liabilities classified as held for sale	-	-	-	-	-	-	-	-
Other current liabilities	Directly attributable other current liabilities and adding company level liabilities in proportion of the raw material cost and the employee benefit expenses	-		Distributed in proportion of related assets	Analytics	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-

SUSTAINABILITY STATEMENT

CONTENT OF THIS REPORT

ESRS 2

GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

/BP-1/

The sustainability statement is prepared in accordance with the European Sustainability Reporting Standards (ESRS). The scope of consolidation of consolidated sustainability statement is same as for financial statements. MOL Group relies on internal policies, materiality and risk assessments to determine whether data collection processes should be set up at subsidiaries. Metrics related to own workforce (S1) are collected at subsidiaries where headcount is above 100. Ethics-related metrics are collected at subsidiaries where an Ethics Officer is appointed, which is mandatory for every subsidiary with above 50 FTE. Regarding environmental, energy, occupational health and safety and process safety metrics, the Group HSE MS allows for a three-year integration period of newly acquired or established subsidiaries in order to set up the policies and data collection processes. Beside the integration period, the materiality of subsidiaries is assessed yearly for all the aforementioned topics. If a subsidiary under integration is expected to be material, it is listed in footnotes of the relevant metrics. MOL Group's double materiality assessment, and thus its sustainability statement, also covers the Group's upstream and downstream value chain and relevant policies, actions, targets and metrics are reported accordingly.

We are committed to continuously improving our sustainability reporting processes and addressing these limitations in future reports to provide more comprehensive and reliable information to our stakeholders.

In preparing this sustainability statement, MOL Group acknowledges certain inherent limitations due to the initial reporting under the Corporate Sustainability Reporting Directive (CSRD). Consequently, comparisons over time may be constrained as frameworks for sustainability reporting are continuously evolving. The data collection processes and methodologies for certain sustainability metrics are still being refined. As such, some data points may be subject to estimation and may not capture all aspects of performance accurately. Any future changes in structure or operations may impact the reported sustainability metrics. The sustainability impacts reported herein are influenced by external factors such as regulatory changes, market conditions, and technological advancements, which may affect the outcomes of our sustainability initiatives.

Section 134/J of the Accounting Act requires the Company to prepare its consolidated annual report in the electronic reporting format (XHTML) as defined in the Commission Delegated Regulation (EU) 2019/815 (ESEF Regulation) and to indicate the sustainability disclosures defined by the ESEF taxonomy in the consolidated sustainability report using the XBRL markup language, including the disclosures required by Article 8 of Regulation (EU) 2020/852. Given that the ESEF taxonomy for sustainability reporting has not yet been adopted, the Company has not been able to perform the XBRL markup.

Assurance

Deloitte provided limited assurance over the sustainability statement and reasonable assurance over two selected KPIs: Scope 1 CO_2 emissions under ETS and TRIR. Please see the auditor's assurance reports.

DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

/BP-2/

Changes in preparation or presentation of sustainability information

From this year, MOL Group includes FGSZ Zrt. in the consolidated Group-level metrics. Due to the unbundled nature of the Midstream company, FGSZ Zrt. was not included in the Group's previous sustainability reports. Since FGSZ Zrt. is a financially fully consolidated subsidiary of MOL Plc., the company is included in the sustainability statement. When inclusion of FGSZ Zrt. was not possible because of differences in calculation methodologies and data collection processes, it is mentioned in the footnotes. Overall, it does not materially affect the conclusions of this report.

Incorporation by reference

The placement of ESRS 2 disclosure requirements in the management report can be found in the section 'List of Disclosure Requirements complied with in preparing the sustainability statement' of this chapter.

Estimations and outcome uncertainty (including value chain estimation)

Some data points require the use of estimations until more reliable direct measurement processes are introduced at the Group-level. For Scope 3 emissions, MOL Group uses activity data and emission factors to calculate emissions where it is not feasible to collect supplier-specific data. In case of the disaggregation of energy consumption and production, MOL Group has to extrapolate on existing reliable data.

Restatements

2023 water discharge figures were restated due to a miscalculation in connection with water discharge with no treatment in INA d.d.

OVERSIGHT ON SUSTAINABILITY-RELATED ISSUES

/GOV-1, GOV-2/

Role of Administrative and Supervisory bodies

General description of MOL Group's governance structure is available in the Corporate Governance Declaration. The Financial Risk Committee (FRC) and the Sustainable Development Committee (SDC) oversee impacts, risks, and opportunities at MOL Group. The SDC approves the Double Materiality Assessment, while the FRC monitors financial and operational risks, including the ERM system. The SDC ensures that management systems and rules of procedures are in place and applied to achieve MOL Group's sustainability goals. Members of the Supervisory Body also attend FRC and SDC meeting, providing oversight of their activities. The roles and responsibilities of Committees are regulated by the Charter of the Committees operated by the Board of Directors of MOL Plc., available on the company's website.

Role of management

Executive management at MOL Group assesses and manages climate-related risks across various roles, including Group Strategy, Chief Economist, Public and EU Regulatory Affairs, HSE department, and Investor Relations. The Board of Directors defines business objectives and reviews strategies based on climate-related risks, receiving regular updates from senior management.

Reporting lines, controls and procedures

The Board of Directors communicates through the Chairman-CEO, who implements resolutions and reports on company affairs. The Board receives updates on strategic issues, capital market developments, and evaluates business unit performance. Additionally, the Board of Directors, committees, and Board members are entitled to request information or opinions from any unit or employee of the company, provided they inform the Chairman-CEO simultaneously.

The Board regularly reports to the Supervisory Board on management, financial situation, and business policy. In addition to the reports from the Board of Directors, Senior Management, and the Audit Committee, the Supervisory Board receives briefings from Internal Audit and detailed information on the functioning of major business areas such as Strategy and Business Development, Investor Relations, Corporate Relations and Regulatory Affairs, Human Resources, Group Compliance and Ethics, Group Security, and Cybersecurity.

Governance is carried out through the Chief Executives' Committee (CEC) and the Management Committee (MC). The CEC adopts strategic decisions, while the MC links the CEC with the company's work organization. Internal Audit evaluates financial, operational, and control activities, reporting to the Finance and Risk Management Committee, Audit Committee, and Supervisory Board.

Setting of targets and monitoring of progress

The Board of Directors defines business objectives and reviews the Group's strategy, integrating climate-related risks. The Board and its committees monitor progress against goals and targets, receiving regular updates on sustainability-related issues.

The Sustainable Development Committee (SDC) and the Finance and Risk Management Committee (FRC) handle climate-related responsibilities. The SDC monitors progress against sustainability goals, with regular reports from the Group Vice President of Health, Safety & Environment and the Head of Investor Relations & ESG Coordination. The Board of Directors and SDC receive sustainability-related topics during meetings.

Sustainability-related expertise

The Board of Directors (BoD), and the Sustainable Development Committee of the BoD receive a wide range of sustainability related topics, either as reports or proposals during each meeting (typically 6 and 4 meeting per year respectively). MOL Group publishes each year the agenda of each Board of Director Meeting: The main measures for developing and enhancing the highest governance body's (BoD) collective knowledge of economic, environmental, and social topics are the discussed agenda points at BoD meetings, where each of these main topics are regularly covered.

Diversity of the Supervisory Board and Board of Directors

	UNIT OF MEASURE	2024	2023	ESRS
Supervisory Board and Board of Directors by gender				ESRS 2 – GOV-1
Male	%	95.5	95.5	ESRS 2 – GOV-1
Female	%	4.5	4.5	ESRS 2 – GOV-1
Supervisory Board and Board of Directors by citizenship				ESRS 2 – GOV-1
Hungarian	%	82.0	82.0	ESRS 2 – GOV-1
Slovak	%	9.0	9.0	ESRS 2 – GOV-1
Croatian	%	0.0	0.0	ESRS 2 – GOV-1
Omani	%	4.5	4.5	ESRS 2 – GOV-1
Czech	%	4.5	4.5	ESRS 2 – GOV-1
Supervisory Board and Board of Directors by age groups				ESRS 2 – GOV-1
Below 30 years of age	%	0.0	0.0	ESRS 2 – GOV-1
Between 30-50 years of age	%	18.2	18.2	ESRS 2 – GOV-1
Over 50 years of age	%	81.8	81.8	ESRS 2 – GOV-1

STAKEHOLDER ENGAGEMENT

/SBM-2, SBM-3/

Groups of stakeholders MOL Group regularly engages with can be obtained from the Stakeholder Engagement section of our website, which include, but are not limited to Shareholders, Employees, Customers, Suppliers, Professional associations, Local communities and authorities. On top of the regular engagement activities conducted by specialised functional departments and business owners within MOL Group, during the autumn of 2023 the ESG Coordination department did a broad internal and external stakeholder engagement with the specific aim to gather information to support our materiality assessment:

- Internal stakeholders were selected to represent both MOL Group's corporate structure (Downstream, Upstream, Consumer Services and Corporate Functions) and geographic structure (Group-level divisions, Mol Hungary, Slovnaft and INA). To assess the Group's impact on external stakeholders, we shortlisted stakeholders including investors & financial analysts, creditors and banks, affected communities, regulators and non-governmental organisations.
- We reached out to our stakeholders by sending them tailored questionnaires, and we conducted in-depth interviews to gather insightful details shared by high-priority stakeholders. Overall, we have registered over 75 samples to our assessment.
- The results were consolidated by using weighting each stakeholder type equally to sufficiently represent all stakeholders. Findings of this exercise as a foundation for our Double Materiality Assessment ensure the continuity of our previous, GRI-based materiality assessment methodology.

The views and expectations of key stakeholders also informed MOL Group's Shape Tomorrow Strategy which includes sustainability-related targets as well. The targets are disclosed in this report in their respective topical chapters.

DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES

/ESRS 2. IRO-1/

ESRS	Disclosure Requirement IRO-1 Disclosure Requirement SBM-2
GRI	GRI 2-14 GRI 2-29 GRI 3-1
IFRS	IFRS S2.25(a)(v) IFRS S2.25(b) IFRS S2.25(a)(iii) IFRS S2.25(a)(iv) IFRS S2.25(c) IFRS S2.25(a)(i) IFRS S2.25(a)(vi)

Double materiality assessment

In 2024, MOL Group introduced a new Double Materiality Assessment (hereinafter: DMA) methodology to comply with CSRD requirements and following the Materiality Assessment Implementation Guidance published by EFRAG. Whilst the bottom-line of the exercise remained to determine the relevant content for MOL Group's Sustainability Report, a key focus of the approach shifted from assessing the importance of certain sustainability topics, to identification of the material impacts on people and the environment; and financial risks and opportunities related to sustainability matters (hereinafter: IROs).

Identification of impacts

Since risks and opportunities generally derive from impacts & dependencies of the company, first step the DMA was the identification of impacts on people and the environment. Building on the results of our established survey-based stakeholder engagement results, analysis of findings from due diligence processes, peer and sector studies, and deep-dive workshops with all relevant internal subject matter experts & leaders related to sustainability matters, we concluded a list of impacts rated by severity (based on the scale, scope and irremediable character of negative impacts and the scale and scope of positive impacts), likelihood and time-horizons.

Table: Scale

	Positive impacts	Negative impacts
Negligible	Scale of the impact is not as significant that would justify inclusion in the Group-level Sustainability Report.	Scale of the impact is not significant, and / or can easily be remediated.
Moderate	The company's activities generate noticeable positive effects on individuals, communities, or the environment, such as improved working or living conditions, or enhanced ecological balance. While these benefits are tangible, they do not represent a fundamental shift in social or environmental well-being.	Scale of the impact is noticeable on the people and environment, but with appropriate mitigation and/or remediation actions grievances are unlikely to be received.
Significant	The company's activities have significant positive impact on individuals or groups that contributes to better living standards or improved conditions, or have a positive impact on the state of environment or availability of natural resources.	The company's activities have negatively impact on individuals, groups of people or on the environment, to the degree that mitigation actions are crucial to avoid or address grievances; or there is potential for irremediability.

Table: Likelihood

	Positive impacts	Negative impacts
Very low	Positive impact is unlikely to reach material level	Unlikely that impact will have material consequences, but precaution is necessary
Low	No / very few cases when positive impact have been present to a material degree.	No / very rare occasions of impact in the past, but constant monitoring is necessary
Medium	Positive impact can materialise, but not as a consequence of regular activities of the company	There has been past events where such impact happened, but actions are in place to manage negative / enhance positive impacts.
High	Positive impact often materialised, but during but not strictly connected to regular activities of the company	Impact is very likely to occur (e.g., in the macro environment), but not part of business as usual
Actual	Positive impact is present as direct consequence of regular company actions or operations	Negative impact is present during regular operations (business as usual)

Table: Scope

Local	Impact is only noticeable in a limited area, e.g. in the proximity of the site.
Territorial	The impact not only have affects in the close proximity of the site where the impact originates, but potentially also affect people or environment of the region.
Country level	Impact is notable or significant in a given country, but does not have significant cross-border implications.
CEE	Impact is noticeable in multiple countries of Central-Easter Europe, where the company operates.
Global	The impact is not limited or connected to a given geographical area.

Table: Time horizons

Short-term	Until the end of the upcoming next reporting period (2025 for current report)
Medium-term	Between 1 and 5 years (2026-2029 for current report)
Long-term	Over years (2030 and later for current report)

Identification of risks

To assess and identify risks related to sustainability matters, the starting point was MOL Group's regular Enterprise Risk Management (hereinafter: ERM) process, which follows the step laid down in the GROUP RISK MANAGEMENT POLICY. This process takes a bottom-up approach, where Risk Owners and Risk Sponsors list all relevant risks related to the business or functional units in their domain. To increase their awareness on ESG topics, the Group Risk Management and Group ESG Coordination organised workshops and shared support materials with relevant Risk Owners and Risk Sponsors to ensure that appropriate consideration were given to the environment, social and governance related risks stemming from dependencies, and identified impacts on people and the environment. From the concluded complete risk register, risks related to sustainability matters have been selected and used to determine the Group-level ESG risks. For each ESG risk, a likelihood and financial effect were determined based on the consolidation of individual risks provided by different business segments and Subject Matter Experts. When assessing the financial effect, resources allocated to mitigate related risks, and where applicable, expected decrease in EBIDTA were taken into account.

Table: – Financial effect of risks

Magnitude of financial effect	Environmental risks (Quantitative assessment)	Social and Governance risks (Qualitative assessment)
Low	Cost of mitigations actions and/or associated EBIDTA loss is unlikely to exceed the threshold of USD 20 million per year in any time horizon on Group level.	Cost of mitigations actions and/or associated EBIDTA loss associated with the risk is unlikely to have financial implications notable to users of the company's statements.
Medium	Resources allocated to mitigations actions and/or associated EBIDTA loss are likely to exceed this USD 20 million per year threshold, but unlikely to exceed USD 50 million in any year before 2030 on Group level.	Cost of mitigations actions and/or associated EBIDTA loss associated with the risk have a potential to be of the interest of the users of the company's statements, but is unlikely to imply notable changes in the business model of the company.
High	MOL Group's business planning processes allocated to mitigation actions, and/or associated EBIDTA loss is very likely to exceed USD 50 million in any year before 2030	The actual or potential cost associated mitigations actions and/or potential EBIDTA loss imply the need for strategic investments or noticeable actions on Group level.

Note: This categorisation regarding the materiality of risks different from those applied for during the Group level ERM in two aspects:

1. Firstly, ERM takes deviation in cash-flow or in EBITDA (asset damage, loss in production, lost revenue, etc.) into consideration; whilst for the financial materiality assessment of sustainability topics relevant under CSRD, the basis of financial materiality is the resources allocated to mitigate related risks and negative impacts on people or the environment, plus in cases where applicable the deviation in EBITDA (positive for opportunities, negative for risks) have been considered.
2. Secondly, the in case of the ERM, USD 20 mn financial impact on the mid-term on Group level is considered the reporting threshold, and USD 50 mn for the materiality threshold. In order to follow the requirements of CSRD, the categorisation of financial magnitude is aligned with to the materiality threshold.

Level of likelihood of risks was determined on the categories below, following the Group-level ERM requirements:

Table. Likelihood of risks

Very low	Is rare/very unlikely to occur within the foreseeable future
Low	Is unlikely to occur within the foreseeable future
Moderate	May occur within the foreseeable future
High	Is likely to occur within the foreseeable future
Very high	Is almost certain to occur within the foreseeable future

Identification of opportunities

The starting point for the identification of opportunities for the DMA was MOL Group's Shape Tomorrow Strategy, which revised in 2024, and additional insights of management of key business units they provided during the aforementioned workshops during the ERM process. The opportunities have been classified based on the two aspects: Maturity at MOL Group and expected magnitude of increased EBIDTA and/or the amount associated of associated investments.

Table. – Maturity of opportunities

General opportunity	The company considers investing in the opportunity on the medium or long term, but currently no activities.

Assessed/ planned	The company is preparing to invest in the opportunity on the short or medium, but currently no significant activities.
Pilot	The company has investments and in the opportunity and prepared for the ramp-up in the short or medium term, but the scale of the projects is currently not significant.
Implemented at scale	The company has mature investments related to the matter and actively engaged in the ramp-up.

Table. – Financial effects of opportunities

Low	Planned or actual CAPEX and/or associated EBIDTA currently does not to exceed the threshold of USD 20 million per year.
Medium	Planned or actual CAPEX and/or associated EBIDTA likely to exceed the USD 20 million per year threshold, but unlikely to exceed USD 50 million in any year before 2030 on Group level.
High	Planned or actual CAPEX and/or associated EBIDTA exceeds, or very likely to exceed USD 50 million in any year before 2030.

Determining material IROs

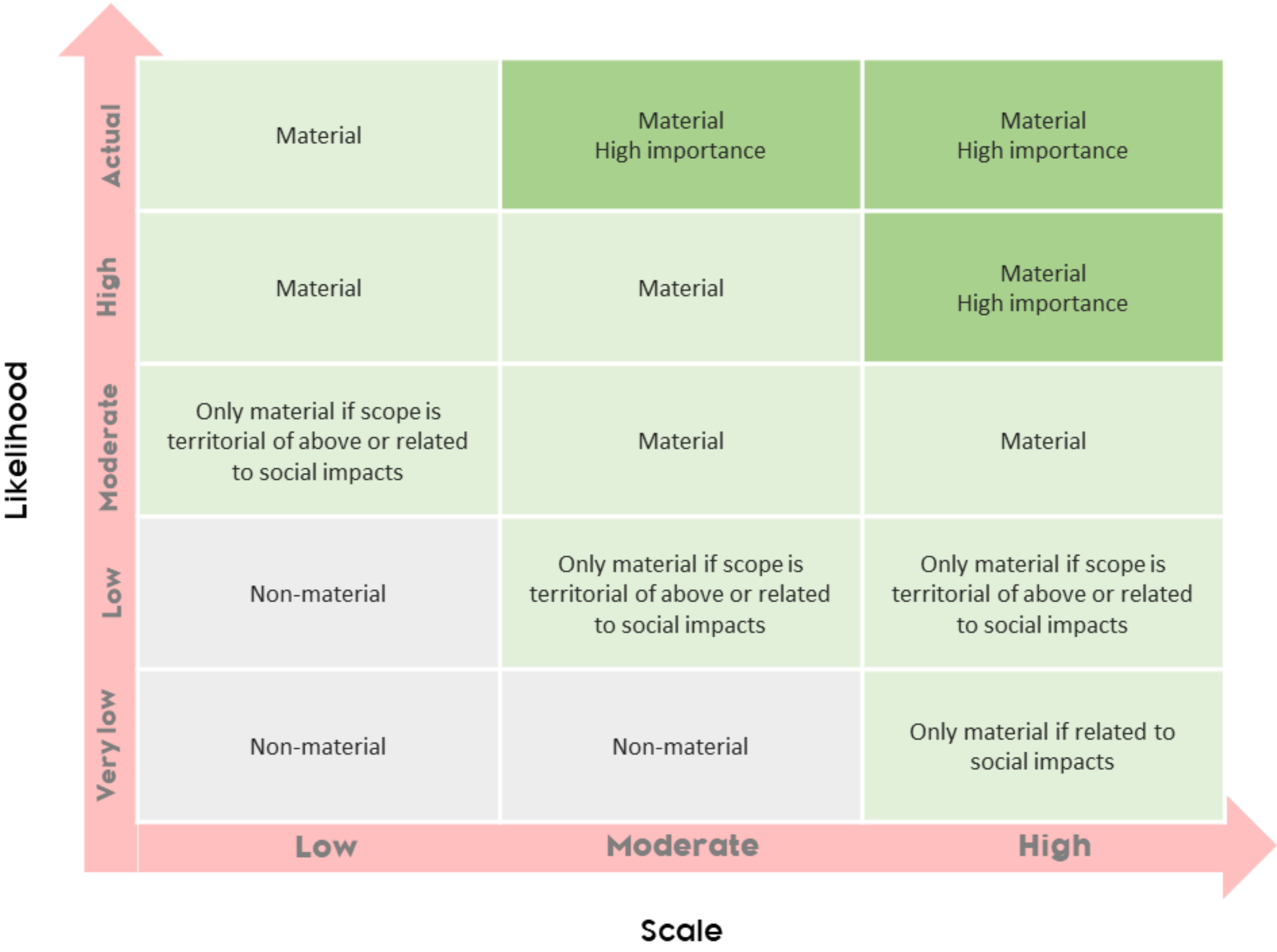
The materiality of each identified IRO has been determined by taking three factors into consideration: scale, likelihood and scope. The table below provides a summary of what these factors mean in each case:

Table. – Factors to determine materiality

	Impacts	Risks	Opportunities
Scale	Scale of the impact, determined by expert judgement	Financial effect of risk	Financial effect of opportunities
Likelihood	Likelihood that the impact will have material consequence on people or environment	Likelihood of the risk materialising on the indicated scale	Refers to the level of the maturity of the opportunity in the companies' operations – see
Scope	Geographic scope where the impact generally materialises	Not relevant	

The threshold for materiality of IROs have been determined based on Table 10.:

Table 10. Materiality thresholds



Validation and approval of our Double Materiality Assessment

Our materiality assessment was first validated by our internal SMEs and our most important external stakeholders. After finalisation, we fulfilled the mandatory requirements described by CSRD & national legislation in Hungary on sustainability reporting: the result has been validated by the Board of Directors, while our methodology has been approved by an external auditor – see Independent Assurance Report attached to our Sustainability Report.

SUMMARY OF MOL GROUP'S DOUBLE MATERIALITY ASSESSMENT RESULTS

/IRO-2/

Material IROs consists of a list of 10 positive and 12 negative impacts, 9 risks (and 3 currently non-material considering the current circumstances, with expectation to became material on the long-term) and 11 opportunities:

IRO group	ID	IRO title	Materiality	Chapter
Actual positive impact	IM-01	Contribution to the transition to low carbon economy	Material (High)	E1
Actual negative impact	IM-02	Effect on climate	Material (High)	E1
Actual negative impact	IM-03	Effect on air quality	Material (High)	E2
Potential negative impact	IM-04	Spills	Material	E2
Potential negative impact	IM-05	Water discharges	Material	E3
Potential negative impact	IM-06	Operations in areas in or near areas with high environmental value	Material	E4
Actual positive impact	IM-07	Providing waste management & circular economy services	Material (High)	E5
Potential negative impact	IM-08	Waste generation	Material	E5
Actual positive impact	IM-09	Key regional business partnerships	Material (High)	G1

IRO group	ID	IRO title	Materiality	Chapter
Potential negative impact	IM-10	Risk of unfair business conduct	Material	G1
Actual positive impact	IM-11	Corporate culture	Material (High)	S1
Actual positive impact	IM-12	Secure employment on fair terms	Material (High)	S1
Potential negative impact	IM-13	Work-related injuries and road accidents	Material	S1
Actual positive impact	IM-14	Training and skills development	Material (High)	S1
Potential negative impact	IM-15	Human rights & labour practices in the value chain	Material	S2
Actual positive impact	IM-16	Corporate giving, donations, volunteering	Material (High)	S3
Potential negative impact	IM-17	Disturbance from operations	Material	S3
Actual positive impact	IM-18	MOL Group as a taxpayer	Material (High)	S3
Potential negative impact	IM-19	Operations in areas with low security	Material	S1
Actual positive impact	IM-20	Supply of critical products (fuel, electricity, convenience products)	Material (High)	S4
Potential positive & negative impact	IM-21	Consumer health & safety	Material	S4
Actual positive impact	IM-22	Providing sustainable mobility services	Material (High)	S4
Potential negative impact	IM-23	Risk of data exposure	Material	S4
Market/technology & legal risk	RK-01	Increased cost of greenhouse gas emissions	Material (High)	E1
Market/technology & legal risk	RK-02	Risks related to new energy efficiency and renewable energy regulations	Material (High)	E1
Potential physical & operational risk	RK-03	Climate change induced physical risks & other natural disasters	Non-material	E1
Physical & operational risk	RK-04	Personal injury risk due to system integrity failure or accidents	Material	E2
Potential physical & operational risk	RK-05	Risk of increased cost of environmental load reduction	Non-material	E2
Operational risk	RK-06	Risks due to waste handling & recycling capacity bottlenecks	Material	E5
Potential operational risk	RK-07	Labour market risks - Employee attraction & retention capabilities	Non-material	S1
Operational risk	RK-08	Risk of shortage of services, feedstock, products to be obtained from market	Material	S2
Physical risk	RK-09	Exposure to security threats	Material	S1
Operational risk	RK-10	Operational hinderances and / or increased expenses due to community issues	Material	S3
Fraud risk	RK-11	Risk of fraud	Material	G1
Operational risk	RK-12	Risk of information & cyber security incidents	Material	G1
Piloted opportunity	OP-01	Green hydrogen production	Material (High)	E1
Opportunity implemented at scale	OP-02	Waste management services	Material (High)	E5
Piloted opportunity	OP-03	Sustainable chemicals	Material (High)	E2
Piloted opportunity	OP-04	Renewable energy production	Material (High)	E1
Assessed / planned opportunity	OP-05	Leveraging subsurface expertise	Material	E1
Opportunity implemented at scale	OP-06	Sharing economy services	Material	S4
Opportunity implemented at scale	OP-07	E-charging network	Material	E1
Assessed / planned opportunity	OP-08	Waste-based fuel usage & production	Material	E1
Opportunity implemented at scale	OP-09	Energy efficiency projects	Material (High)	E1
Piloted opportunity	OP-10	Sustainable aviation fuel	Material (High)	E1
Opportunity implemented at scale	OP-11	Biogas production	Material (High)	E1

Details of each IRO – such as description, time horizons, remendability, information on the relevancy in MOL Group's value chain and connected sustainability topics are described in the beginning of the corresponding topical standard. MOL Group's Materiality Matrix provides the sustainability matters from the topical perspective. It maps the list of topics taken from *ESRS 1 paragraph AR 16*, and tailored to MOL Group - i.e., by selecting the most illustrative granularity, and by adding entity-specific topics: Disturbance of local communities, Shared wealth and economic impact, Cyber security). The matrix considers each of the selected topics from the two dimensions of Double Materiality:

	Explanation
Impact materiality	A sustainability matter is material from an impact perspective when it pertains to MOL Group's material actual or potential, positive or negative impacts on people or the environment connected with its own operations as well as through its business relationships, value chains and products & services. In our assessment, a topic is considered material from the "impact" perspective, if there was at least one *impact* on the IRO list, where the topic was marked as relevant.
Financial materiality	A sustainability matter is material from the financial perspective when it is considered material for primary users of general-purpose financial reports in making decisions relating to providing resources to the entity. In our assessment, a topic is considered material from the "financial" perspective, if there was at least one *risk or opportunity* on the IRO list, where the topic was marked as relevant.

Impact materiality / Financial materiality	NON-MATERIAL	MATERIAL	HIGH
HIGH	• Pollution of air • Pollution of water • Pollution of soil • Gender equality and equal pay for work of equal value • Employment and inclusion of persons with disabilities • Measures against violence and harassment in the workplace • Diversity • Adequate housing • Communities' economic, social and cultural rights • Training and skills development	• Management of relationships with suppliers including payment practices • Working time • Secure employment • Adequate wages • Freedom of association • Collective bargaining	• Climate change mitigation • Energy • Resources inflows, including resource use • Resource outflows related to products and services • Waste • Shared Wealth & Economic Impact • Access to products and services
MATERIAL	• Pollution of living organisms and food resources • Water consumption • Water withdrawals • Water discharges • Impacts on the extent and condition of ecosystems • Corporate culture • Protection of whistle-blowers • Political engagement and lobbying activities • Working conditions in the value chain • Equal treatment and opportunities for all in the value chain • Child labour in the value chain) • Forced labour in the value chain • Other work-related rights in the value chain • Health and safety of consumers • Security of a person • Work-life balance	• Corruption and bribery (including: detection, prevention, trainings, incidents) • Social dialogue • Health and safety • Disturbance of local communities • Privacy • Cyber security • Substance of concern • Substance of very high concern	
	• Climate change adaptation • Extraction and use of marine resources • Rights of indigenous peoples • Direct impact drivers of biodiversity loss • Impacts on the state of species • Impacts and dependencies on ecosystem services • Microplastics • Communities' civil and political rights • Freedom of expression • Access to (quality) information • Protection of children • Non-discrimination • Responsible marketing practices • Animal welfare		

Impact materiality

Financial materiality

Selecting material Disclosure Requirements /IRO-2_13/

The primary aim of the DMA is to determine which Disclosure Requirements (DR) are to be elaborated on in out Sustainability Report. As a preliminary step, we have assigned the relevant DR to each IRO on our final list. For this exercise, we have consulted the document „*Links* *between AR16 and Disclosure requirements*" (ID 177) published by EFRAG. Generally, if we matched at least one material IRO to a DR, we considered it material, meaning we include it in MOL Group's 2024 Sustainability Report. To determined materiality the sub-paragraphs under DRs, we also considered the Materiality Matrix and relevant IROs to make our judgement.

List of Disclosure Requirements complied with in preparing the sustainability statement

DR		Reference to chapter
ESRS 2 BP-1	General basis for preparation of the sustainability statements	
ESRS 2 BP-2	Disclosures in relation to specific circumstances	
ESRS 2 GOV-1	The role of the administrative, management, and supervisory bodies	• Oversight on sustainability related issues • Corporate Governance Declaration (2.-6.)
ESRS 2 GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	
ESRS 2 GOV -3	Integration of sustainability-related performance in incentive schemes	• Corporate Governance Declaration (8.)
ESRS 2 GOV-4	Statement on sustainability due diligence	• G1 – Sub-chapter B: Supply chain management
ESRS 2 GOV-5	Risk management and internal controls over sustainability reporting	• Oversight on sustainability related issues • Integrated Risk Management
ESRS 2 SBM-1	Strategy, business model, and value chain	• Management Discussion&Analysis (3.)
ESRS 2 SBM-2	Interests and views of stakeholders	• Stakeholder engagement
ESRS 2 SBM-3	Material impacts, risks, and opportunities and their interaction with strategy and business model	
ESRS 2 IRO-1	Description of the process to identify and assess material impacts, risks, and opportunities	
ESRS 2 IRO-2	Disclosure requirements in ESRS standards covered by the undertaking's sustainability statements	• Summary of MOL Group's double materialiaty assessment
E1-1	Transition plan for climate change mitigation	• Transition plan and targets related to climate change
E1, SBM-3	Material impacts, risks, and opportunities, and their interaction with strategy and business model	• Impacts, risks and opportunities related to climate change
E1, IRO-1	Description of the process to identify and assess material climate-related impacts, risks, and opportunities	
E1-2	Policies related to climate change mitigation and adaptation	
E1-3	Actions and resources in relation to climate change policies	• Action related to climate change
E1-4	Targets related to climate change mitigation and adaptation	• Transition plan and targets related to climate change
E1-5	Energy consumption and mix	• Metrics related to energy consumption and mix
E1-6	Gross scope 1, 2, 3 and total GHG emissions	• Metrics related to GHG emissions
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	• No disclosure (not materials)
E1-8	Internal carbon pricing	

DR		Reference to chapter
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	No disclosure (phase-in)
E2, IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	• Impacts and risks related to pollution
E2-1	Policies related to pollution	
E2-2	Actions and resources related to pollution	
E2-3	Targets related to pollution	
E2-4	Pollution of air, water and soil	• Metrics related to air water and soil pollution
E2-5	Substances of concern and substances of very high concern	• Information on substances of concern & Substances of very high concern
E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	No disclosure (phase-in)
E3, IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	• Identified water related impacts
E3-1	Policies related to water and marine resources	• Policies related to water use
E3-2	Actions and resources related to water and marine resources	• Actions related to water use
E3-3	Targets related to water and marine resources	• Targets related to water
E3-4	Water consumption	• Metrics related to water use
E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	No disclosure (phase-in)
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	No disclosure (not material)
E4, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	No disclosure (not material)
E4, IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	• Impacts, risks and opportunities related to biodiversity
E4-2	Policies related to biodiversity and ecosystems	
E4-3	Actions and resources related to biodiversity and ecosystems	• Actions related to biodiversity and ecosystems
E4-4	Targets related to biodiversity and ecosystems	
E4-5	Impact metrics related to biodiversity and ecosystems change	• Metrics related to biodiversity and ecosystems
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	No disclosure (phase-in)
E5, IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	• Identified impacts and risks related to own waste generation and treatment • Identified risks and opportunities related to circular economy & resource use in the downstream segment • Identified impacts, risks and opportunities related to circular economy services
E5-1	Policies related to resource use and circular economy	• Policies related to waste generation and treatment • Policies related to resource use • Policies related to circular economy services
E5-2	Actions and resources related to resource use and circular economy	• Actions related to waste generation and treatment • Actions related to resource use • Actions and resources related to circular economy services
E5-3	Targets related to resource use and circular economy	• Targets related to waste generation and treatment • Targets related to the circular economy services business segment
E5-4	Resource inflows	• Metrics related to waste generation and treatment • Metrics related to resource in- and outflows of the downstream business segment • Metrics related to resource in- and outflows of the circular economy services business segment
E5-5	Resource outflows	• Metrics related to waste generation and treatment • Metrics related to resource in- and outflows of the downstream business segment

DR		Reference to chapter
		• Metrics related to resource in- and outflows of the circular economy services business segment
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	No disclosure (phase-in)
S1, SBM-2	Interests and views of stakeholders	• Identified impacts and risks related to human resource management • Identified impacts and risks related to occupation health & safety • Identified impact related to diversity and inclusion
S1, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
S1-1	Policies related to own workforce	• Policies & engagement related to own workforce • Policies related to health, safety and security of workers • Policies, engagement and grievances related to diversity and inclusion • Policies related to grievances and remediation
S1-2	Processes for engaging with own workers and workers' representatives about impacts	• Policies & engagement related to own workforce • Engagement related to health, safety and security of workers • Policies related to health, safety and security of workers • Policies, engagement and grievances related to diversity and inclusion
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	• Policies related to health, safety and security of workers • Policies, engagement and grievances related to diversity and inclusion • Policies related to grievances and remediation
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	• Actions related to human resources • Actions and resources related to occupational health & safety • Actions related to diversity and inclusion
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	• Targets related to human resources • Targets related to health & safety • Targets related to diversity and inclusion
S1-6	Characteristics of the undertaking's employees	• Metrics related to characteristics of employees
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	No disclosure (phase-in)
S1-8	Collective bargaining coverage and social dialogue	• Metrics related to collective bargaining coverage and social dialogue
S1-9	Diversity metrics	• Metrics related to diversity and inclusion
S1-10	Adequate wages	
S1-11	Social protection	No disclosure (phase-in)
S1-12	Persons with disabilities	
S1-13	Training and skills development metrics	• Actions related to human resources
S1-14	Health and safety metrics	• Metrics related to health and safety
S1-15	Work-life balance metrics	No disclosure (phase-in)
S1-16	Compensation metrics (pay gap and total compensation)	• Metrics related to remuneration (pay gap and total remuneration)
S1-17	Incidents, complaints and severe human rights impacts	• Metric related to incidents and complaints related to a fair, ethical , inclusive work environment
S2, SBM-2	Interests and views of stakeholders	No disclosure (phase-in)
S2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
S2-1	Policies related to value chain workers	• Policies, engagement and grievances related to diversity and inclusion (phase-in)
S2-2	Processes for engaging with value chain workers about impacts	No disclosure (phase-in)

DR		Reference to chapter
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	• Policies related to grievances and remediation (phase-in)
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	No disclosure (phase-in)
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	
S3, SBM-2	Interests and views of stakeholders	• Impacts and risks related to affected local communities • Impacts related to shared wealth & economic impact
S3, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
S3-1	Policies related to affected communities	• Policies related to affected local communities • Policies related to shared wealth & economic impact
S3-2	Processes for engaging with affected communities about impacts	
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	• Actions to manage impacts and risks related to affected local communities • Actions related to shared wealth & economic impact
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	• Targets related to affected local communities • Targets related to shared wealth & economic impact
S4, SBM-2	Interests and views of stakeholders	• Impacts and opportunities related to consumers
S4, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	
S4-1	Policies related to consumers and end-users	
S4-2	Processes for engaging with consumers and end-users about impacts	• Policies related to consumers and end-users
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end- users, and effectiveness of those actions	• Actions related to consumers and end-users
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	• Excluded (more information in Excluded Disclosure Requirements from Social Standards)
G1, GOV-1	The role of the administrative, supervisory and management bodies	• Oversight on sustainability related issues
G1, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	• Impacts, risks & opportunities related to business conduct • Impacts on suppliers
G1-1	Corporate culture and Business conduct policies and corporate culture	• Policies related to business conduct •
G1-2	Management of relationships with suppliers	• Policies related to relationships with suppliers
G1-3	Prevention and detection of corruption and bribery	• Policies related to business conduct
G1-4	Confirmed incidents of corruption or bribery	• Incidents of corruption or bribery
G1-5	Political influence and lobbying activities	• Political influence and lobbying activities
G1-6	Payment practices	• Metrics related to payment practices

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

DR	Data point		Legislation	Chapter
ESRS 2 GOV-1	21 (d)	Board's gender diversity	SFDR, BRR	Oversight on sustainability related issues
ESRS 2 GOV-1	21 (e)	Percentage of Board members who are independent	BRR	Oversight on sustainability related issues
ESRS 2 GOV-4	30	Statement on due diligence	SFDR	Supply chain management
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	SFDR, P3, BRR	Management Discussion&Analysis (3.)
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	BRR	Management Discussion&Analysis (3.)
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	BRR	not relevant
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco	EUCL	not relevant
ESRS E1-1	14	Transition plan to reach climate neutrality	EUCL	Transition plan and targets related to climate change
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks	P3, BRR	Transition plan and targets related to climate change
ESRS E1-4	34	GHG emission reduction targets	SFDR, P3, BRR	Transition plan and targets related to climate change
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources	SFDR	Metrics related to energy consumption and mix
ESRS E1-5	37	Energy consumption and mix	SFDR	Metrics related to energy consumption and mix
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	SFDR, P3, BRR	Metrics related to GHG emissions
ESRS E1-6	53-55	Gross GHG emissions intensity	SFDR, P3, BRR	not material
ESRS E1-7	56	GHG removals and carbon credits	EUCL	not material
ESRS E1-9	66	Exposure of the benchmark portfolio to climate related physical risks	BRR	No disclosure (phase-in)
ESRS E1-9	66 (a), (c)	Disaggregation of monetary amounts by acute and chronic physical risk; location of significant assets at material physical risk	P3	No disclosure (phase-in)
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	P3	No disclosure (phase-in)
ESRS E1-9	69	Degree of exposure of the portfolio to climate related opportunities	BRR	No disclosure (phase-in)
ESRS E2-4	38	Amount of each pollutant listed in annex II of the E-PRTR regulation emitted to air, water, and soil	SFDR	Metrics related to air, water and soil pollution
ESRS E3-1	9	Water and marine resources	SFDR	Policies related to water use
ESRS E3-1	13	Dedicated policy	SFDR	Policies related to water use
ESRS E3-1	14	Sustainable oceans and sea	SFDR	Policies related to water use
ESRS E3-4	28 (c)	Total water recycled and reused	SFDR	Metrics related to water use
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	SFDR	Metrics related to water use
ESRS 2 – IRO 1 – E4	16 (a) i	Activities negatively affecting biodiversity-sensitive areas	SFDR	Impacts, risks and opportunities related to biodiversity
ESRS 2 – IRO 1 – E4	16 (b)	Land degradation, desertification, or soil sealing	SFDR	No disclosure (not material)
ESRS 2 – IRO 1 – E4	16 (c)	Threatened species	SFDR	No disclosure (not material)
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	SFDR	No disclosure (not material)
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	SFDR	No disclosure (not material)
ESRS E4-2	24 (d)	Policies to address deforestation	SFDR	No disclosure (not material)

DR	Data point		Legislation	Chapter
ESRS E5-5	37 (d)	Non-recycled waste	SFDR	Metrics related to waste generation and treatment
ESRS E5-5	39	Hazardous waste and radioactive waste	SFDR	Metrics related to waste generation and treatment
ESRS 2 – SBM 3 – S1	14 (f)	Risk of incidents of forced labour	SFDR	Workforce
ESRS 2 – SBM 3 – S1	14 (g)	Risk of incidents of child labour	SFDR	Workforce
ESRS S1-1	20	Human rights policy commitments	SFDR	Policies, engagement and grievances related to diversity and inclusion
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	BRR	Minimum social safeguards (MSS) assessment
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	SFDR	No disclosure (not material)
ESRS S1-1	23	Workplace accident prevention policy or management system	SFDR	Policies related to health, safety and security of workers
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	SFDR	Policies, engagement and grievances related to diversity and inclusion
ESRS S1-14	88 (b), (c)	Number of fatalities and number and rate of work-related accidents	SFDR, BRR	Metrics related to health and safety
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness paragraph	SFDR	No disclosure (phase-in)
ESRS S1-16	97 (a)	Unadjusted gender pay gap	SFDR, BRR	Metrics related to remuneration (pay gap and total remuneration)
ESRS S1-16	97 (b)	Excessive CEO pay ratio	SFDR	Metrics related to remuneration (pay gap and total remuneration)**)**
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	SFDR, BRR	Metric related to incidents and complaints related to a fair, ethical , inclusive work environment
ESRS 2 – SBM 3 – S2	11 (b)	Significant risk of child labour or forced labour in vaue chain	SFDR	No disclosure (not material)
ESRS S2-1	17	Human rights policy commitment	SFDR	No disclosure (phase-in)
ESRS S2-1	18	Policies related to value chain workers	SFDR	No disclosure (phase-in)
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	SFDR, BRR	No disclosure (phase-in)
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Convention 1 to 8	BRR	No disclosure (phase-in)
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	SFDR	No disclosure (phase-in)
ESRS S3-1	16	Human rights policy commitments	SFDR	Policies related to affected communities
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles and OECD guidelines	SFDR, BRR	No disclosure (not material)
ESRS S3-4	36	Human rights issues and incidents	SFDR	No disclosure (not material)
ESRS S4-1	16	Policies related to consumers and end-users	SFDR	Policies related to consumers and end-users
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	SFDR, BRR	No disclosure (not material)
ESRS S4-4	35	Human rights issues and incidents	SFDR	No disclosure (not material)
ESRS G1-1	10 (b)	United Nations Convention against Corruption	SFDR	Minimum social safeguards (MSS) assessment
ESRS G1-1	10 (d)	Protection of whistle-blowers	SFDR	Policies related to grievances and remediation

DR	Data point		Legislation	Chapter
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	SFDR, BRR	Incidents of corruption and bribery
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	SFDR	Policies related to business conduct

(SFDR = Sustainable Finance Disclosure Regulation, P3 = EBA Pillar 3 disclosure requirements, BRR = Climate Benchmark Standards Regulation, EUCL = EU Climate Law)

ESRS ENVIRONMENT

CLIMATE CHANGE

/E1/

TRANSITION PLAN AND TARGETS RELATED TO CLIMATE CHANGE

/E1-1; E1-4/

Shape tomorrow strategy

MOL Group recognized early the necessity of coordinated industrial development and sustainable objectives. Since the publication of the Group-level strategy in 2016, the focus has been on a gradual transition towards meeting the demands of a low-carbon economy.

In 2024, MOL Group announced its updated Shape Tomorrow Strategy in response to the changing external environment. Despite MOL Group's long-term goals and the fundamental principles of its strategy remaining unchanged, evolving energy and fuel demand market trends, the importance of secure energy supply, and the EU's more ambitious decarbonization targets necessitated an update to the strategy, prompting the revision of sustainability goals to accelerate the transition. The strategy was updated to reduce absolute emissions by 25% by 2030 compared to our 2019 base value. This 25% absolute emission reduction target is equivalent to a 33% reduction on the previous (2019 like-for-like) terms. Representatives of the main business divisions and functional areas are involved in strategy and target setting, and any changes to the strategy need approval from the Board of Directors.

MOL Group's sustainability strategy is embedded in its business strategy and business planning: the company strives for a smart energy transition which makes the Central and Eastern European region more sustainable, more self-sufficient and more competitive. The transition path builds on the above-average growth trajectory expected in CEE economies and MOL's ambition to retain or increase its presence in this area in its traditional wholesale and retail markets. This resilient growth model is foreseen to be maintained over the strategic horizon to 2030 and is the main engine to fund the transition.

To reach its ambition of net climate neutrality by 2050, MOL Group is committed to the transformation of its fossil-fuel-based operation into a low-carbon, sustainable business model. This model builds on the already existing integrated nature of the company: MOL will provide sustainable materials and circular solutions for the economy, low carbon fuels for mobility and convenient products and services for the people on the move, while also minimizing the environmental footprint of its own operations.

Transition plan and decarbonization levers

Expanding on MOL Group's Shape Tomorrow strategy, the company also discloses its transition plan for the first time in the 2024 sustainability statement. The transition plan was approved by the Sustainable Development Committee of the Board of Directors in February 2025. As part of the sustainability statement, it was also approved by the Board of Directors in March 2025, and by the Annual General Meeting in April 2025. The plan includes key milestones for 2030 and 2050 with the following targets:

- Decrease absolute gross Scope 1 and 2[8] GHG emission by 25% by 2030 compared to 2019[9],
- Decrease absolute gross Scope 3 GHG use-phase emissions of our sold energy products[10] (Category 11: Use of sold products) by 5% by 2030 compared to 2022,
- Reach net zero GHG emissions on all Scopes by 2050,
- Allocate 30-40% of total CAPEX to low-carbon and sustainable business projects between 2025 and 2030.

The targets take into account MOL Group's best estimates with regards to macroeconomic scenarios, the speed of the energy transition in the Central and Eastern European region, established regulatory frameworks and the Group's expected strategic shifts in the business scope.

The base year and the baseline value for Scope 1 and 2 GHG emissions are aligned with the Shape Tomorrow Strategy and remains unchanged. Since there was no significant change neither in the GHG reporting boundary in the 2019-2024 period, nor in the measurement methodologies and significant assumptions behind the GHG calculation, the baseline value is considered representative and consistent with the reported GHG inventory boundaries[11] of MOL Group's current operations. The baseline value was 6.93 mn tons of CO_2-eq for Scope 1 emissions and 0.7 mn tons of CO_2-eq for Scope 2 location-based emissions. Due to the unbundled nature of FGSZ Zrt., Scope 1 and 2 emissions of FGSZ are not included in the target and in the described decarbonization levers. Metrics are disaggregated in 'Metrics related to GHG emissions' section for traceability of target scope.

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[8] Scope 2 location based

[9] GHGs covered in target: carbon dioxide (CO_2) and methane (CH_4)

[10] Target refers to Scope 3 Category 11: Use of sold products, which includes sales of natural gas and fossil-based refinery products.

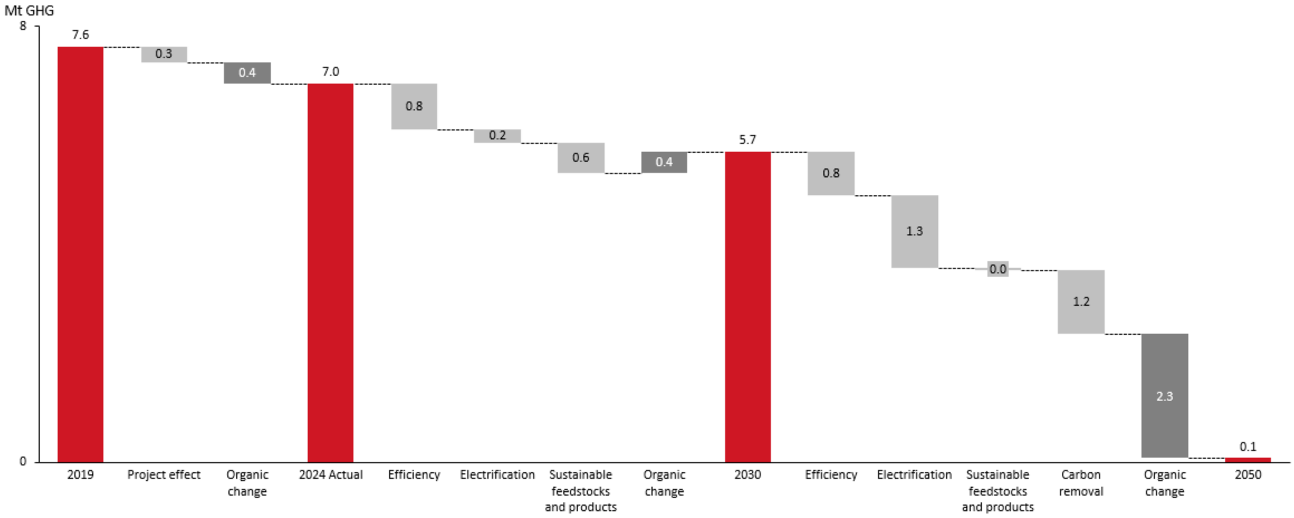
[11] As stated in section Basis for Preparation, newly acquired companies are not yet part of the GHG inventory.

The base year for Scope 3 GHG use-phase emissions of sold energy products is 2022 due to more reliable data collection and the fact that this is a newly introduced target[12]. The target is consistent with the Group's GHG inventory boundary and includes the use-phase emission of all energy products sold to third parties, most notably natural gas, motor gasoline and diesel. The baseline value for Scope 3 GHG use-phase emissions of sold energy products is 56.7 mn tons of CO_2-eq.

MOL Group's target for the share of low-carbon CAPEX takes into account a wide variety of projects, including, but not limited to EU Taxonomy aligned projects. MOL's low carbon definition covers every project which contributes to the Group's energy transition by lowering emissions (including energy efficiency, electrification) or stepping into new, low carbon businesses (renewable energy, circular economy).

MOL Group identified the key decarbonization levers and their expected contribution to the aforementioned Scope 1 and 2 target. The levers are listed below and also visualized on the below figure. Decarbonization levers.

Figure. Decarbonization levers



1. Energy efficiency: Energy efficiency involves optimizing processes and equipment to reduce energy consumption and emissions. This includes upgrading to more efficient machinery, improving insulation, and implementing advanced process controls. By reducing energy waste, companies can lower their carbon footprint and operational costs. Energy efficiency technologies are well-established and widely implemented across various industries, including the oil and gas sector. For this reason, energy efficiency initiatives are key from the earliest stages of decarbonization.

MOL Group has already implemented several actions related to this decarbonization lever, listed in the *Actions related to Climate Change* section. Energy efficiency is expected to contribute 800 kt of Scope 1 and 2 emissions reductions between 2025-2030.

2. Electrification and renewable energy: Electrification involves replacing fossil fuel-based energy sources with electricity. This transition can significantly reduce greenhouse gas emissions, especially when combined with renewable energy integration. The maturity of electrification and renewable energy technologies varies. Solar and wind power are highly mature and cost-competitive with traditional energy sources in the CEE region. While rapidly advancing technology, integrating renewable energy at industrial production sites also poses several challenges. The variability and intermittency of renewable energy sources can lead to reliability issues; conventional power management systems require significant upgrades or the adoption of advanced solutions such as energy storage installation; more specifically for oil and gas operations, full balance of steam systems also has to be considered.

MOL Group has already implemented actions which support the electrification of its production sites. Electrification and renewable energy is expected to contribute a further 100-200 kt of Scope 1 and 2 emissions reduction between 2025-2030.

3. Sustainable feedstocks and products: This lever includes using sustainable feedstocks such as green hydrogen, biogas, biomethane, biofuels, waste-based feedstock, and recycled plastics. These alternatives can replace conventional fossil-based feedstocks, reducing the carbon intensity of products and processes. The above-mentioned products are not only feedstocks for MOL Group's own operations but also direct the company towards a more sustainable product portfolio.

[12] Based on the European Sustainability Reporting Standards and the Transition Plan Implementation Guidance, baseline value cannot be earlier than 2022, except for cases where a target was already set before the publication of the transition plan.

The maturity of sustainable feedstocks and products varies. For example, biofuels and biogas are relatively mature and commercially available, while technologies like green hydrogen are still developing but show significant potential. MOL Group has already implemented projects in all of these directions. A more detailed description is available in the *Actions related to Climate Change* section.

4. Carbon capture solutions: Carbon removal solutions involve capturing and storing carbon dioxide emissions from industrial processes or directly from the atmosphere. Technologies include carbon capture, utilization, and storage (CCUS), direct air capture (DAC) and solutions related to land-use change. Verified negative emissions are an acknowledged part of climate scenarios and will be necessary to tackle residual emissions in hard-to-abate sectors such as oil and gas.

Carbon removal technologies are in various stages of development. CCUS is relatively mature and has been implemented in several large-scale projects around the world, while DAC is still in the early stages but is rapidly advancing. MOL Group plans to use and gradually scale up carbon removal solutions after 2030 to reach its net zero target.

Beside the described decarbonization levers, MOL Group acknowledges that future organic growth (investments in new assets), but also the decline of traditional fossil fuel sales due to demand changes (presented as organic decline in the chart) will affect the Group's emission pathway. The planned actions and the expected demand changes are also taken into account in the transition plan.

Assumptions of transition plan and 1.5°C alignment

MOL Group's transition plan is based on the company's long-term premises, in line with the Shape Tomorrow Strategy. MOL premises are the basis of project evaluation and strategic direction setting. Premises are developed through partial equilibrium models where we regularly use external assumptions, including IEA World Energy Outlook scenario results. However, climate modelling is not the scope of these exercises.

Universally accepted economic or energy models that can incorporate the impact of and on climate change typically lack the granularity necessary for the design of the transition plan of more concentrated asset portfolios such as that of MOL Group. Hence, it is difficult to apply global results to specific regions, countries, especially if the green transition is multi-speed. First, the EU commitment to green transition suggests a very different transition path from the path of the global average. But even with EU-level granularity, there are significant differences between Western and Central and Eastern Europe in key factors defining the pathway, such as access to capital, technology and innovation, government policies, production costs, customer preferences. That suggests that even within the EU/Europe there will be different transition pathways.

Assessment of the transition plan's compatibility with a 1.5°C pathway faces difficulties not just from the point of view of geographical limitations, but also industry-specific ones. A widely accepted, oil and gas industry specific benchmark for a 1.5°C compatible gross absolute GHG emission pathway is not yet available. MOL Group will assess the feasibility of adopting such a plan once the relevant guidelines and resources, primarily from the Science Based Target Initiative (SBTi), become available.

MOL Group's forecasts are prepared for three scenarios: Slow Transition, Steady Transition & Net Zero Emission. The green energy transition is happening in all three scenarios, the biggest difference between them is the pace of the transition. The Shape Tomorrow Strategy and the transition plan is predominantly based on the Steady Transition scenario. If one of the other two scenarios materializes, it would mostly affect the timing of the investments and actions envisaged in the Shape Tomorrow Strategy and the transition plan, not the strategic directions themselves.

For the above reasons, MOL Group's 2030 targets are below the SBTi's cross-sector pathway, which suggests that gross Scope 1, 2 and 3 emissions should be reduced by 42% by 2030 and 90% by 2050 from 2020 levels[13]. Based on the Group's activities, MOL Group is excluded from the EU Paris-aligned Benchmarks.[14]

More information about the resilience of the strategy are available in the Integrated Risk Management chapter of the Management Report and under the description of 'RK-03: Climate change induced physical risks & other natural disasters' of this chapter.

Assessment of locked-in emissions

As an integrated oil and gas company, MOL Group's current operations include hydrocarbon exploration and production, crude oil refining and petrochemical production. While these operations and the related assets and product portfolio make up the overwhelming majority of the Group's emission profile, they are also key to the Group's abilities to finance and implement the actions necessary to the energy transition.

The Upstream operations span nine countries, with active production in eight. In 2024, MOL Group produced 93,838 barrels of oil equivalent per day. At the end of 2023, MOL Group was estimated to have 76 MMboe of natural gas and 242 MMboe of crude oil and condensates as proved reserves (1P). While MOL is committed to launching low-carbon projects in the Central and Eastern Europe (CEE)

[13] SBTi: Pathways to Net Zero
[14] Article 12(1) of Commission Delegated Regulation (EU) 2020/1818

region between 2025 and 2030 as part of its 2030 strategy, the current production activities inherently involve significant emissions. These emissions are locked in due to the nature of the existing assets and their expected operational lifetimes.

The Downstream segment includes three refineries (Danube refinery, Bratislava refinery, Rijeka refinery) and two petrochemical units, located in Slovakia, Hungary, and Croatia, and with sales focused in 14 countries across Central and Eastern Europe. These facilities convert crude oil into various refined products such as gasoline, diesel, heating oil, lubricants and petrochemical products such polypropylene, low-density and high-density polyethylene. In 2024, MOL Group sold 18.6 million tons of refined products and 1.1 million tons of petrochemical products. MOL Group's largest ever organic investment, the Polyol project was inaugurated in May 2024 and will significantly enhance the Group's petrochemical production capacity. Given that Downstream operations contribute significantly to the Group's emissions, these facilities and the related product portfolio represent the highest locked-in emissions within our portfolio. While these emissions could hinder our ability to meet our GHG reduction targets and increase transition risk, the facilities are also the primary candidates for carbon removal technologies due to the concentrated GHG emissions. Thus, we are actively focusing on GHG emission reduction, sustainable chemical transformation, circular economy initiatives, renewable fuels, including green hydrogen projects to mitigate these emissions and diversify our product portfolio from fossil fuels towards sustainable materials, as presented earlier in this chapter. The Sisak refinery in Croatia, previously shut down, is being retrofitted to become a biogas/biomethane plant utilizing agricultural waste. This transformation is part of our broader strategy to transition into a low-carbon energy company while ensuring stable and affordable supply of energy products.

ACTIONS RELATED TO CLIMATE CHANGE

/E1-3/

Progress: actions taken and planned

MOL Group has already implemented several actions and initiatives to converge towards the aforementioned transition targets. This chapter reports on our past progress compared to our base year in 2019 and more specifically focuses on developments in 2024, while also presents the key actions and resources to achieve our goals.

Past progress

MOL Group has decreased Scope 1 and 2 emissions by 9% between 2019 and 2024. The key decarbonization lever which contributed to this decrease is energy efficiency. Since 2020, several projects have been implemented with 0.3 mn tons of CO_2 reduction impact compared to the 2019 base year. In 2024, MOL Group invested approximately USD 38 million in CAPEX on several major projects aimed at enhancing energy efficiency and reducing emissions.

EU Taxonomy eligible activities in turnover is 9.3%, in OpEx 28.4%, in CapEx 21.0% for the year 2024. EU Taxonomy aligned activities in turnover is 0.5%, in OpEx 5.5%, in CapEx 7.3% for the year 2024. Relatively low alignment percentages are partially result of the previously demonstrated facts, that significant part of MOL Group's activities is still related to the oil and gas industry and a conservative approach has been followed in the assessment and reporting. More detailed table can be found in the EU Taxonomy Report of the Sustainability Statement.

The financial figures presented in this section are part of the same line items in the financial statement as the definition of total CAPEX in the EU Taxonomy Report.

One key initiative involved replacing four high-power rate condensing turbines in Rijeka Refinery in 2023 with electric drives equipped with frequency drive system. This upgrade significantly improved energy performance indicators by increasing overall efficiency. Another important project in Rijeka Refinery focused on hydrogen management improvement. By installing new pipes and spill pressure flow control systems, surplus pure hydrogen was redirected directly to the Hydrocracking Unit, translating into emission reduction of 11 ktpa.

Heat integration in a Crude Oil Distillation Unit was a major focus in 2024 at Danube Refinery, as they are among the biggest energy consumers. Efficiency improvements were achieved by installing compabloc type heat exchangers on the main and preflash columns as condensers, integrating them into the crude preheat line, and utilizing heat from vacuum residue to preheat reduced crude. This project aimed to improve efficiency, reduce natural gas consumption, and lower CO_2 emissions.

Another project that also focused on CDU efficiency upgrade involved revamping the existing INA Rijeka Refinery Crude Distillation Unit to enhance energy efficiency and operational conditions, implemented during 2020-2024.

To increase feedstock processing efficiency and produce more products like ethylene and propylene, two new Pressure Swing Absorption units were installed in steam cracker units in 2023 at MPC (MOL Petrochemicals). These units produce high-purity hydrogen, which can be used in fuel gas systems or provided to the Polyol Complex project.

One of the most significant green hydrogen projects aims to develop production capabilities that could replace traditional hydrogen production units at Danube refinery. We invested over USD 17 mn in an electrolyzer unit to partially phase out conventional hydrogen production. In 2024, we successfully inaugurated a green hydrogen facility at the Danube Refinery with a 10 MW electrolysis unit, which reduces CO_2 emissions by 25 ktpa, producing about 1,600 t of green hydrogen to be used primarily in our own fuel production.

In 2020, the rubber bitumen plant in Zalaegerszeg began operations, utilizing a new manufacturing technology for crumb rubber developed jointly by MOL and Pannon University. This rubber bitumen, made from bitumen and waste tyres, offers several advantages over conventional road construction bitumen, including a longer lifecycle, better resistance to environmental impacts, and improved traffic safety due to reduced braking distances.

Overall, these projects are able to reduce CO_2 emission in MOL Group operations by more than 150 ktpa.

In line with our strategic direction, several acquisitions have been made in recent years. In 2019, MOL Group acquired the German-based Aurora Kunststoffe GmbH, a leading engineering plastic scrap recycling company supplying the automotive industry. This acquisition strengthened our presence in recyclate-based compounds and our position as an automotive supplier, supporting MOL Group's ambition to transform its fuel-based business model in Downstream to a higher value-added petrochemical product portfolio.

In April 2022, MOL Group acquired ReMat, Hungary's market-leading plastics recycling company, which uses communal and industrial waste to create recycled plastic granules. This transaction increased MOL Group's total capacity for recycled plastic material from 25,000 tons/year to 40,000 tons/year.

In 2023, MOL Group acquired its first biogas plant near Szarvas, Hungary. This plant processes over 100,000 tons of feedstock, including residual waste from food producers, farmers, and livestock producers in the region, producing more than 12.5 million cubic meters (mcm) of biogas per year.

Additionally, in December 2024, we expanded our renewable energy capacity by acquiring Naperőmű Farm Kft. This company oversees the construction of a 66 MWp photovoltaic plant in Ballószög, Hungary. With construction completed, trial runs are expected to start in January 2025.

Further sustainability-related initiatives have also been implemented at our Circular Economy Services segment in Hungary. While these actions do not result in immediate Scope 1 and 2 emission reductions, the successful operation of this segment is key to MOL Group's long-term strategy.

The integrated waste management concession started its operation successfully in 2023 in line with the terms laid down in the Act on Waste and in the concession agreement. The scope of the concession covers the waste management public service task and the waste management institutional tasks. MOHU takes a managing role in the waste management value chain from collection to handover for treatment. Waste management services continued with an uninterrupted frequency, collection method being consistent with pre-concession period. The cooperation with relevant authorities and government bodies is continuous. The government published the relevant legislative acts and guiding methodologies, introducing a completely new, cost-based price regulation, which includes the setting of fees for the EPR system.

With regards to efficiency measures, the waste management landscape has been rationalized in the first quarters of operation. The previous modus operandi of 26 independent service providers had been reviewed for the concession. By reducing the number of regions to six and bringing the service providers under these umbrellas, MOHU has already explored how, on a country-wide scope, synergies could and can be identified and utilized for a more efficient operation.

The new extended producer responsibility system (EPR) has been introduced from 1 July 2023, in which producers are responsible for financing the treatment or disposal of post-consumer products. Furthermore, the deposit refund system (DRS) has commenced on 1 January 2024. In case of both systems, MOHU is the designated operating organization. As part of the DRS and with close cooperation of retail partners, more than 2,600 reverse vending machines (RVMs) have already been installed by 1 July 2024, when the system came into full effect after a half-year transition period. By the end of the year, the number of installed RVMs reached approximately 3,200, with a further 1,500 contracted manual takeback points increasing national coverage of the system.

All investments made in 2024 were intended to intensify selective waste collection, and projects included the development of separate textile waste collection infrastructure, the rollout of bio kitchen waste collection system, and the purchase of first own collection vehicles. Furthermore, the first own waste yard investment in Esztergom had been completed and started its operation in May 2024, performing above expectations in terms of waste material throughput.

Key actions planned and allocated resources

Over the next five years, we have several actions planned to enhance efficiency and reduce emissions, requiring around USD 800 million in CAPEX from our total planned USD 4.3 billion for low-carbon projects. Efficiency projects include initiatives such as boosting profitability by replacing liquid fuel with gaseous fuel at the Slovnaft powerplant. This change is expected to reduce CO_2 emissions by approximately 230 ktpa and increase the yield of white products, making it one of the largest CO_2 reduction initiatives in Downstream. Various efficiency enhancements are also planned at the Slovnaft Refinery.

In terms of electrification and renewable energy, we are focusing on replacing key condensing steam drives with electromotors at the Slovnaft refinery. This change aims to reduce heavy fuel oil usage for steam production, leading to a decrease in CO_2 and other pollutant emissions by 100-150 ktpa. At MPC, we plan to improve energy efficiency and electrification and reduce CO_2 emissions by upgrading turbines and installing a new steam pipeline. These measures are expected to save significant energy and decrease CO_2 emissions by 61 kt pa.

A leading decarbonization project in Upstream with significant emission reduction of more than 100 ktpa is the construction of CO2 compressor station at Ethane Plant in Croatia, designed to compress CO_2 separated from natural gas. This project is part of the EOR (Enhanced Oil Recovery) program which aims to reduce CO_2 emission through recycling and injecting it back to the system.

The company will also expand its green electricity production in Tiszaújváros with a new 48 MWp solar power plant, one of the largest directly connected to an industrial consumer in Hungary. The project, planned to be implemented by 2026, covers an average of 5% of the Tiszaújváros manufacturing unit's annual electricity demand, which can reach up to 30% during peak periods. The solar park reduces the site's CO_2 emissions by 17 ktpa.

Our sustainable feedstocks and products strategy includes green hydrogen, biomethane, and waste feedstock, together requiring around USD 3 billion in CAPEX investment. Green hydrogen production at the Group level is crucial for ensuring long-term compliance and competitiveness in the renewable energy sector. Therefore, we plan to undertake additional green hydrogen projects, including the development and investment in a 20 MW electrolyser unit at the Slovnaft Refinery. This initiative aims to partially phase out conventional hydrogen production by 2030. Following the handover of the green hydrogen plant at Danube Refinery, the next step involves preparing and developing an investment option to produce green hydrogen at a scale that can replace one of the current grey hydrogen producing unit at the Danube Refinery. The bio-oil processing project aims to introduce bio-content into motor fuels produced by Slovnaft, focusing on cost efficiency. By co-processing bio-materials using existing refinery assets, the project minimizes investment and environmental impact by avoiding new greenfield investments, and maximizes cost efficiency for incorporating bio-content into finished fuels. MOL Group is also planning to carry out multiple projects that will scale up biomethane production for both internal and external demand.

To manage our hazardous waste and meet all emission requirements, we began constructing a state-of-the-art hazardous waste incinerator at the Danube Refinery in 2020. This project aims to address both MOL's operational waste and the increasing demand in the Hungarian market.

Until 2050, major efficiency projects will continue to be our main decarbonization lever, in Danube refinery as well as in MPC and Slovnaft, electrification projects will continue its later phases well into 2040s at all large sites under MOL Group. The upstream business is currently investigating geothermal opportunities, which, if successful, will be implemented post-2030, and expected to cut our emissions by cca. 100 ktpa. Green hydrogen projects will expand into MPC with the objective of reducing the CO_2 footprint of MOL Petrochemicals by partially replacing hydrogen production from a grey-hydrogen plant with a new green-hydrogen electrolysis technology. The produced green hydrogen will be used within the existing assets of the MPC, specifically in the Polyol complex, with no plans for external sales. The remaining emissions will be addressed with carbon capture (more than 1 million tonnes of CO_2) and the organic decline of fossil-based production due to changes in consumer behavior (more than 2.3 million tonnes of CO_2), which is expected to accelerate by the 2040s.

Overall, the described transformation requires significant funding. MOL Group has published its financial framework for the 2025-2030 period in the Shape Tomorrow Strategy, which presents a viable path towards the full execution of the Group’s organic investment plan, even at conservative macro assumptions. More favourable macroeconomic conditions would leave financial headroom fro special dividends and acquisitions as well.

In 2024, MOL Group has spent 492 bn HUF on CAPEX and investments related to its Upstream, Downstream and Consumer Services business divisions covering significant CapEx for oil and gas related economic activities, as stated in the Management Discussion and Analysis chapter 3.3-3.5. MOL Group has no coal-related economic activities.

IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CLIMATE CHANGE

/E1. IRO-1; E1. SBM-3/

ESRS	Disclosure Requirement E1.IRO-1, E1.SBM-3,
IFRS	IFRS S2.25(a) IFRS S2.10(d) IFRS S2.22(b)(i)(2) IFRS S2.22(b)(i)(3) IFRS S2.22(b)(i)(4) IFRS S2.25(a) IFRS S2.25(b) IFRS S2.25(a)(ii) IFRS S1.23 IFRS S1.B42(c)

MOL Group's double materiality assessment conducted in 2024 covered the impact of our operations on climate change, and the vast implications of climate change on the current and future financial performance of MOL Group – including risks and opportunities. The general methodology and consultation process are detailed in section ESRS 2 IRO-1 of this report. Procedures for identifying actual and potential environmental impacts and risks – including climate change, pollution and water use are outlined in *Element 2: Risk & Change Management* of Health, Safety and Environment Management System (hereinafter HSE MS) of MOL Group:

- MOL Group has a company-wide HSE risk assessment system in place to identify, assess, manage, regularly review and document hazards and risks related to operations.
- Risk assessment is conducted by competent personnel with appropriate knowledge and experience. The methodology used for risk assessment is selected in accordance with the complexity of the assessed activities/workplaces.
- Identified risks, preventive, control and mitigation measures are documented and a tracking system is in place that facilitates regular reviews to ensure that risks are properly managed. Risk mitigation measures follow the hierarchy of elimination, substitution, engineering control, administrative control and personal protective equipment.
- A management-of-change process is in place to assess, control and manage all critical changes to organization/personnel, technologies, facilities and processes. All changes in operations, processes and activities are accordingly re-assessed from a risk perspective. Risk assessments related to changes are subject to the same rigorous review that is applied to new processes and activities.
- Identified risks, preventive, control and mitigation measures are communicated to all relevant employees and affected parties.
- Environmental risks and impact of the operation are identified and assessed. In order to minimize medium and high risks and impacts, action plan is developed and implemented.

HSE MS details specific measures related to GHG management, including regular risk assessment (see Section Policies: Climate change mitigation and adaptation in this chapter). Furthermore, each business unit has processes related to the identification of climate related risks which are then channeled into the Group-level risk assessment and strategy processes – see description of processes in section E1- *Policies: Climate change* of this chapter. Insights from this process are aggregated the double materiality assessment through engagement with internal environmental protection experts and business-side stakeholders, ensuring a comprehensive evaluation of climate risks and impacts.

MOL Group has identified 2 climate change related impacts, 3 risks and 4 opportunities in the 2024 double materiality assessment. As a result, we concluded the topic Climate Change to be material from impact perspective. From financial perspective, currently (on the short- and medium term) we consider climate change as material topic due to the high likelihood and high magnitude of the financial effect.

The list of material impacts, risks and opportunities are described in the tables below:

Table IM-01: Contribution to the transition to low carbon economy

Severity	Significant positive impact
Scope	CEE
Likelihood	Actual impact
Description	MOL Group has long-standing experience in conventional energy production, however, it is exploring opportunities arising from low carbon energy solutions & dedicated towards decarbonisation of its own operations and its value chain to contribute to the energy transition of the CEE region. One of the key pillars of MOL Group's "Shape tomorrow" strategy is investing in green electricity generation & electric car charging, increasing energy efficiency of production, using and producing low-carbon fuel alternatives such as biogas & biofuels, and utilising modern technologies such as CO2 injection for Enhanced Oil Recovery to reduce carbon footprint and increase productivity.
Mitigation actions & remendability	MOL Group's mitigation actions include ensuring business continuity by developing and maintaining comprehensive contingency plans, investing in emerging green technologies to promote sustainability, and exploring innovative business solutions to adapt to evolving market demands.
Time horizons	MOL Group's contribution to a low carbon economy is integral part of its long-term strategy, as the company's dedicated to become a net-zero carbon by 2050.
Relevance in the value chain	Transition to low carbon economy has a material impact of MOL Group's industrial operations, including New and Sustainable Businesses (hereinafter: NSB), Consumer Services and in the Circular Economy Services business segments.

Table IM-02: Effect on climate

Severity	Significant negative impact
Scope	Global
Likelihood	Actual impact
Description	MOL Group's main activities are related to the oil and gas industry, associated with high greenhouse gas (GHG) emissions during its own operations (Scope 1), through its upstream value chain (Scope 2 & 3) and through its sold products (Scope 3). In 2024, MOL Group's total GHG footprint (Scope 1, 2 and 3) was 63.6 mn tonnes of CO2eq. MOL Group acknowledges that via its GHG footprint it contributes to climate change, affecting both people and the environment.
Mitigation actions & remendability	MOL Group's mitigation actions include GHG emission reduction actions such as transitioning to low-carbon solutions and implementing energy efficiency projects. Generally, effect of GHG emissions are considered irremediable. MOL Group is dedicated to reduce its emissions and the exploration of carbon capture technologies (see OP-5) to contribute to rectifying the impact of emissions on the longer term.
Time horizons	MOL Group aims to reduce its GHG emission gradually, by 25% until 2030 (compared to 2019) and reach net zero emissions by 2050. Until 2050, we expect the impact to be material.
Relevance in the value chain	Climate change is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Gas Midstream, New and sustainable businesses, Consumer Services and in the Circular Economy Services business segments.

Table RK-01: Increased cost of greenhouse gas emissions

Type	Market/technology and legal risk
Likelihood	Very high
Magnitude of financial effect	High
Description	Existing (ETS I.) and emerging (ETS II., CBAM, Methane Regulation) legislation in relation to the European Green Deal leads to increased costs for companies for their GHG emissions. Fluctuation in the price of emission quotas leads to uncertainties and poses risk to the profitability of MOL Group's core activities.
Related impact & dependencies	An integrated oil&gas company (O&G) Mol Group's current business model is highly dependent on fossil fuels both during its energy intensive industrial operations (drilling, oil refining, petrochemical production) which lead to significant Scope 1 & 2 GHG emissions, and also due to Scope 3 value chain emissions associated with sold fuels and polymers. This causes exposure to climate mitigation regulation. Because of its current business model, Mol Group has a significant impact on climate change (IM-1).
Mitigation actions	To reduce the aforementioned risk stemming from dependency on fossil fuels and impact on climate change, MOL Group has a detailed Climate Transition Plan (see DR E1-1). To ensure the business continuity while transitioning away from fossil fuels, MOL Group in engaged in providing various low carbon solutions (see IM-2) and puts great emphasis on improving energy efficiency and fuel switch (see DR E1-3). Green transition also opens new business fields which the company is actively pursuing – see Mol Group's Shape Tomorrow strategy and for more information.
Financial effect & time horizons	As of 31 December 2024, the Group has recognised a provision of HUF 72,464 million for the shortage of emission quotas. For more details, see MOL Group's Financial statement (Non-Financial Assets and Liabilities – 16. Provisions). On the long term, we expect the price of quotas to increase due to the shrinking number of total free allocated quotas. We consider the topic climate change mitigation as financially material due to the significant amount of related investment plans on short, medium and long-term as well.
Relevance in the value chain	Climate change is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Gas Midstream, New and sustainable businesses, Consumer Services and in the Circular Economy Services business segments.

Table RK-02: Risks related to new energy efficiency and renewable energy regulations

Type	Market/technology and legal risk
Likelihood	High
Magnitude of financial effect	High
Description	EU's ambitious regulatory requirements related to the use of renewable energy and energy efficiency puts pressure on the oil & gas sector to adapt new, often immature and high-cost technologies. Compliance requires high CAPEX thus poses risks to short-term competitiveness. On the other hand, improving energy efficiency and adaptation of renewables are not only crucial the realise emission reduction targets, but also contributes to more efficient operations and potential revenue sources on the long-term.
Related impact & dependencies	The source of the risk is that as an integrated oil&gas company (O&G), MOL Group's current business model is highly dependent on fossil fuels during its energy intensive industrial operations (drilling, oil refining, petrochemical production), which leads to exposure to regulation aimed at promoting renewable energy sources. Because of its current business model, Mol Group has a significant impact on climate change (IM-1).
Mitigation actions	To reduce the aforementioned risk stemming from dependency on fossil fuels and impact on climate change, MOL Group has a detailed Climate Transition Plan (see DR E1-1). To ensure the business continuity while transitioning away from fossil fuels, MOL Group in engaged in providing various low carbon solutions (see IM-2) and puts great emphasis on improving energy efficiency and fuel switch (see DR E1-3). Green transition also opens new business fields which the company is actively pursuing – see Mol Group's Shape Tomorrow strategy for more information.
Financial effect & time horizons	Albeit the financial risks associated with exposure to regulation aimed at promoting renewable energy sources (mainly RED III and EED) is only expected to materialise after 2030 (long-term), the MOL Group is already investing significant amounts to increase the use of renewable energy and energy efficiency, therefore the financial magnitude of these actions are important also on the short- and medium term.
Relevance in the value chain	Climate change is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Gas Midstream, New and sustainable businesses, Consumer Services and in the Circular Economy Services business segments.

Table RK-03: Climate change induced physical risks & other natural disasters

Type	Physical risk
Likelihood	Low
Magnitude of financial effect	Low
Description	Identified physical risks include a combination of both acute risks (extreme rainfall and flooding), as well as chronic risks (extreme heat, fluctuating water levels and drought). If any of these events were to occur, they could have an adverse effect on MOL Group's assets, operations and staff. MOL Group has incurred and is likely to continue incurring additional costs to protect its assets, operations and staff from physical risks. To the extent such severe weather events or other climate conditions increase in either frequency, severity or both, MOL Group may be required to adjust its operations and incur costs that could adversely affect its financial position. See more information in our Integrated Risk Management Report (TCFD disclosures).
Related impact & dependencies	The source of this risk is external, and not related to dependencies or impacts.
Mitigation actions	MOL Group operates Risk Engineering program, where the potential impacts of water-related events analysed in main Downstream sites. Actions related to climate change adaptation and water supply issues are elaborated in DR E1-3 and DR E3-2.
Financial effect & time horizons	The financial effect of this risk category relates to the asset damage & lost production due to the aforementioned events. Other relevant costs include the cost of insurance and the expanse of investments to adopt & mitigate potential losses – see DR E1-3. Since the majority of MOL Group's assets are heavy industry equipment, they are relatively resilient even to extreme weather events. Operational hinderances due to natural phenomena (such as lack of industrial water supply) are also rare. Therefore, physical risks are only considered (potentially) financially material on the long term.
Relevance in the value chain	Climate change is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Gas Midstream, New and sustainable businesses, Consumer Services and in the Circular Economy Services business segments.

Table OP-01: Green hydrogen production

Maturity at MOL Group	Pilot
Magnitude of financial effect	High
Description	Green hydrogen is expected to play a major role in heavy industry and transportation decarbonization. MOL Group can leverage existing infrastructure and expertise in large-scale industrial processes to produce green hydrogen via electrolysis using renewable energy sources, supporting the transition to a low-carbon economy. MOL inaugurated its first 10 MW capacity green hydrogen plant in Százhalombatta and announced planned investments in Slovakia and Croatia.
Related impact & dependencies	MOL Group's business model requires significant amount of energy – with increasing emphasis on renewable sources. Green hydrogen production supports the regulatory compliance with both carbon reduction schemes (such as EU ETS) and renewable energy use (RED III), therefore contributes to the mitigation of related impacts and risks (see IM-01, IM-02, RK-01, RK-02).
Financial effect & time horizons	This opportunity is already pursued by MOL Group since the inauguration of facility in Százhalombatta (EUR 22 million CAPEX), which will produce ca. 1600 tonnes of green hydrogen annually. Therefore, it is considered financially material in all time horizons.
Relevance in the value chain	Green hydrogen production is material impact of MOL Group's industrial operations, including the Refining, Petrochemical and New and Sustainable Businesses.

Table OP-04: Renewable energy production

Maturity at MOL Group	Pilot
Magnitude of financial effect	High
Description	MOL Group is currently implementing multiple renewable energy projects to increase the share of green electricity in our overall energy consumption. For instance, renewable electricity will be used to cover the consumption growth of green hydrogen (H2), which is utilized to decarbonize the energy consumption of owned plants and sites or sold to third parties. The current portfolio of 110 MW is planned to scale up in synergy with current and future electricity consumption (up to 2500 GWh RE consumption by 2030). While solar projects are expected to provide the majority of production, complementary renewable sources (such as geothermal) and storage solutions are also considered.
Related impact & dependencies	MOL Group's business model requires a significant amount of energy, with an increasing emphasis on renewable sources. Green energy is essential for regulatory compliance with carbon reduction schemes

	(such as the EU ETS) and renewable energy use (RED III), thereby contributing to the mitigation of related impacts, risks and costs (i.e. IM-01, IM-02, RK-01, RK-02).
Financial effect & time horizons	The current operation of 110 MW of solar production is considered the first step, making the opportunity financially material only in the mid- and long term. The scale-up of the portfolio is planned in synergy with the company's current and future electricity consumers, with an organic CAPEX of USD 700 million between 2025 and 2030.
Relevance in the value chain	Renewable energy production is material impact of MOL Group's industrial operations, including the New and Sustainable Businesses and others.

Table OP-05: Leveraging subsurface expertise (geothermal, lithium and Carbon Capture and Storage (CCS)

Maturity at MOL Group	Assessed/Planned
Magnitude of financial effect	Medium
Description	Oil and gas expertise in subsurface exploration can be applied to geothermal energy production, lithium extraction for batteries, and implementing carbon capture and storage technologies to mitigate greenhouse gas emissions. MOL Group has been in the process of planning to utilize geothermal energy as a renewable energy source. The project is still in the exploration phase both in Hungary and Croatia, but has the same benefits as presented in CCS is also in the exploration phase, MOL Group is identifying suitable storage sites. The technology has the potential to become a key enabler of achieving net zero emissions targets, especially in hard-to-abate industries MOL Group is analyzing the opportunity of Direct Lithium Extraction to extract a valuable metal from underground, which is a key material for green-tech solutions.
Related impact & dependencies	Geothermal energy, lithium mining and CCS technologies are a key enablers of becoming net zero for the industry, therefore expected to play an increasingly important role in Mol Group's low carbon transition, thereby contributing to the mitigation climate change of related impacts, risks and costs (i.e. IM-01, IM-02, RK-01, RK-02).
Financial effect & time horizons	Since large scale implementation of these technologies are only expected after 2030, the financial effect is considered „medium".
Relevance in the value chain	Leveraging subsurface expertise is material impact of MOL Group's industrial operation, specifically in the Upstream business segment.

Table OP-09: Energy efficiency projects

Maturity at MOL Group	Implemented at scale
Magnitude of financial effect	High
Description	Investment in energy efficiency and electrification initiatives optimise operations, reduce energy consumption, and lower greenhouse gas emissions – consequently, it contributes to the competitiveness and profitability of MOL Group. Energy efficiency improvement is relevant in all business activities with focus on the refining segment, where to goal is to reach second quartile in Solomon Energy Intensity Index.
Related impact & dependencies	Energy efficiency investments support the mitigation of climate related impacts and risks (see IM-01, IM-02, RK-01, RK-02) by reducing the carbon footprint of the company.
Financial effect & time horizons	MOL Group expects investments in high asset efficiency to deliver USD 150mn savings by 2025 via energy efficiency, maintenance, and logistics on track to secure additional cash flow for strategic investments. The opportunity is considered material on all time horizons.
Relevance in the value chain	Energy efficiency projects is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical and New and Sustainable Businesses.

The climate related opportunities has strong interconnections with other environmental and social topics, such as resource use and circular economy, consumers and end-users. Please see these described in the respective chapters:

- OP-06: Sharing economy services (Chapter S4)
- OP-07: E-charging network (Chapter S4)
- OP-08: Waste-based fuel usage and production (Chapter E5)
- OP-10: Sustainable aviation fuel (Chapter E5)
- OP-11: Biogas production (Chapter E5)

POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

/E1-2/

ESRS	Disclosure Requirement E1-2
GRI	Several GRI 3 3-3 c
IFRS	IFRS S2.25(a) IFRS S2.25(b)

The following section outlines MOL Group's policies for managing material impacts, risks, and opportunities related to climate change mitigation and adaptation. MOL Group recognises the need to simultaneously strengthen the supply security and accelerate the green energy transition. Our commitment to mitigate the impact of our operations on climate change (IM-01, IM-02), and approach to manage financial effects and risks associated with GHG emission related regulations and adaptation to climate change (RK-01,RK-02) whilst seeking business opportunities in the area of green transition (OP-1, OP-4 , OP-7, OP-9, OP-10, OP-11) is expressed at all layers of our policies:

1. **Strategic level:** The long-term business strategy of MOL Group aims at transforming our traditional fossil-fuel-based operations into a low-carbon, sustainable business model.
2. **Business unit level:** Business specific processes related to climate change mitigation and adaptation are outlined in each business unit's respective Area Books.
3. **Environmental regulations:** MOL Group's approach to handling Health, Safety and Environment related impacts and risks of climate change are outlined in the overarching Group-level internal regulations covering all activities with environmental impact.

1. Strategic level: Shape Tomorrow Strategy

The overarching climate strategies and policies of MOL Group are outlined in its **Shape Tomorrow Strategy** Review, approved by the Board in 2024. These strategies are driven by the company's commitment to achieving long-term climate neutrality and integrating sustainability into its operations. Key focus areas include:

- **Climate Neutrality Commitment**: Aiming for net climate neutrality by 2050, MOL Group has set progressively ambitious targets for reducing greenhouse gas emissions, demonstrating an even stronger focus on tackling climate change.
- **Sustainable Transformation in Downstream Operations**: Supporting the vision to become a sustainable chemicals company and a low-carbon mobility provider, MOL Group is dedicated to reducing its operational carbon footprint and striving toward net-zero emissions.
- **Advancing New and Sustainable Businesses**: Driving emission reductions and transition to green economy by accelerating the development of biogas and hydrogen value chains and expanding activities in recycling and material compounding.
- **Renewable Energy and Circular Economy**: Prioritizing the use of renewable electricity and advancing waste management operations to supply feedstock for the energy industry, contributing to both decarbonization and resource efficiency.
- **Green and Integrated Mobility Solutions:** Transforming into a digitally advanced provider of sustainable mobility services, MOL Group aims to meet evolving consumer and market demands by integrating green mobility solutions, such as low-emission transportation options and innovative, environmentally friendly mobility services, into its offerings. This transition supports a broader commitment to reducing carbon emissions in the transportation sector.
- **Decarbonizing Exploration and Production (E&P)**: Leveraging expertise in areas such as geothermal energy and lithium projects, complying with methane regulations, and exploring carbon capture and storage (CCS) technologies to support the Group's climate goals.

These commitments are also transposed into time-bound, measurable targets – as outlined in the Transition Plan section of this chapter.

2. **Business unit level:**

MOL Group's key business unit define their approach to climate change mitigation and sustainable development in their respective Area Books, outlining relevant processes and principles:

Downstream Production Area Book

The primary objective of Downstream Production is to convert raw materials into high-quality products in a safe, sustainable, reliable, and efficient manner, in line with the Shape Tomorrow Strategy. To achieve our hydrocarbon refining and petrochemical production goals, we focus on providing the necessary resources in a way that ensures operational safety and environmental protection:

- Energy Management: The key priority is improving energy performance, reducing GHG emissions, and optimizing energy production and consumption at the site level. This is achieved through accurate planning aligned with production needs, as well as corrective and efficiency measures to ensure continuous improvement.
- Environmental Compliance: Downstream Production units operate in accordance with strict environmental regulations to keep emissions within prescribed limits. Technologies and processes are designed to prevent major environmental spills that could result in groundwater, air, or soil pollution.

Renewables & Energy Efficiency Management Area Book

This framework establishes MOL Group's Renewables & Energy Efficiency Management System in line with ISO 50001 standards. The objective is to implement a systematic approach to improving energy efficiency and integrating energy management practices across the organization:

- **Energy Performance:** Continuous improvement in energy efficiency is pursued to reduce costs, enhance competitiveness, and lower GHG emissions.
- **Knowledge Sharing & Awareness:** The principles of energy efficiency are promoted across the Group through training, workshops, and internal communication to encourage energy-conscious project development and decision-making.

Circular Economy Services Area Book

MOL Group aims to be a key player in the circular economy within the Central and Eastern European region. This is a model across value chains and industries, redefining product design, production and consumption, and it aims to reduce waste and resource use by transforming the lifecycle of products. Circular economy is based on three principles, driven by design eliminating waste and pollution; circulating materials and products at their highest value; and regenerating nature. The Area Book defines the processes embedding these principles into business operations:

- **Regulatory Compliance & Investment:** Circular Economy Services (CES) oversees compliance with EU and national waste management directives, ensuring MOL meets Extended Producer Responsibility (EPR) obligations efficiently. Investment projects are planned and executed according to MOL Group's project management principles to align with corporate and regulatory sustainability goals.
- **Recycling & Waste Management:** The Group is expanding its petrochemical portfolio with recycled plastic feedstocks and is committed to energy recovery from non-recyclable waste through incineration.

3. **Environmental regulations:**

The **Group HSE and Social Impact Policy** declares MOL Group's public commitment to acting responsibly regarding the health, safety, environmental (HSE), and social impacts of our daily operations. This commitment includes improving asset integrity, preventing incidents of all kinds, and maintaining high standards in emergency response. We are dedicated to reducing our environmental footprint, protecting natural resources, and supporting international efforts to address climate-change related risks. MOL Group also strives to create positive impacts in the communities where we operate, while eliminating negative effects on society as a whole.

All of our employees and contractors have a responsibility to maintain high HSE standards and management must take a leadership role in this. Accountability for implementing the policy lies primarily with the top management, local CEOs or Managing Directors, supported by the Group HSE Senior Vice President and local HSE Managers.

This overarching policy applies to all MOL Group activities, extending across both operated and, where feasible, non-operated joint ventures. It spans the entire MOL value chain and geographical reach, affecting a wide range of stakeholders, including employees, contractors, visitors, and surrounding communities. It specifically addresses all stages of project development, from design through decommissioning, ensuring HSE principles are embedded throughout.

This commitment is integrated into MOL Group's corporate governance systems on multiple levels:

Health Safety and Environment Area Book is the highest level process-based regulation in the field of HSE management, focusing on end-to-end processes describing the operation model and the interactions within and outside the organisation.

MOL Group Health, Safety & Environment Management System (Current version: V5, hereinafter: HSE MS) is a Process Description regulating all processes listed in Health Safety and Environment Area Book, establishing a comprehensive framework that aligns health, safety, environmental, and community impact guidelines with MOL's strategic business objectives across 12 key elements**.** The table below gives the description of elements which are relevant for the purposes of this report, indication on how they related to managing the identified material IROs and reference to the relevant parts of this report:

Element	Description	Relevant IROs
ELEMENT 1: Leadership, Commitment & Accountability	Management, workforce and contractors understand their accountabilities aligned with job responsibilities, authority levels and performance objectives, and they demonstrate leadership and commitment to the Group-level HSE and Social Impact Policy through visible and effective HSE management.	
ELEMENT 2: Risk & Change Management	Systems are in place to identify, assess, manage, regularly review and document HSE-related hazards and risks associated with MOL Group activities to prevent or reduce the likelihood and/or consequences of incidents. Planned and unplanned changes to MOL Group activities are identified and properly managed from a risk perspective.	All HSE-related

Element	Description	Relevant IROs
ELEMENT 3: Competence, Training & Behaviour	Employees, contractors and third parties are aware of relevant HSE requirements, hazards, risks and controls, and are competent at conducting their activities and behave responsibly. Competencies are regularly assessed.	IM-13, IM-14, IM-15, RK-04
ELEMENT 4: Contractor Management	Contractors are assessed for their capabilities and competencies and selected to perform work for / on behalf of MOL Group where they are monitored to ensure their HSE performance is in alignment with MOL Group requirements.	
ELEMENT 5: Design & Construction	The assessment and management of process and HSE risks are an integral part of project design and construction, enabling sound HSE performance throughout the planning, construction and commissioning of facilities.	IM-06
ELEMENT 6: Operational and occupational safety	Operational safety: Maintain operational reliability and integrity throughout the whole lifecycle of our assets by use of clearly defined and documented operational and structured maintenance and inspection programs. This requires effective procedures, reliable safety-critical equipment, and adequate and competent human resources who consistently execute these procedures and practices. Occupational safety: We continuously maintain occupational safety by use of clearly defined and documented operational and structured work safety programs. This requires effective procedures and training of staff as well as reliable, adequate and competent human resources who consistently support these procedures and practices, while protecting the health of employees, providing adequate relevant medical services, and promoting healthy lifestyles.	IM-13, IM-14, IM-15, RK-04
ELEMENT 7: Environmental Stewardship	Our environmental footprint is reduced, natural values are protected, and climate-change related risks are addressed. Environmental issues are addressed and controlled, consistent with policy, regulatory requirements and business plans. Environmental performance (including emissions, discharges and wastes) is tracked and stewarded to meet performance goals.	IM-01, IM-02, IM-03, IM-04, IM-05, IM-06, IM-08, RK-01, RK-02, RK-06, RK-05
ELEMENT 8: Information & Documentation	All the information required to ensure accuracy and consistency when applying risk controls is documented and systematically maintained. The HSE impacts of MOL Group's products and services are assessed, managed and communicated to customers and users to enable their responsible use. The introduction of new products/substances into manufacturing or operational processes is controlled.	IM-04
ELEMENT 9: Stakeholder & Community Relations	Open, proactive and effective HSE communication and consultation is maintained with stakeholders regarding the HSE aspects of all of our business activities.	IM-17
ELEMENT 10: Incident Management	Systems are in place to ensure that all HSE incidents are reported, recorded, investigated and analysed in a timely manner to prevent recurrence and improve performance. Corrective and preventive actions are defined, their effectiveness is evaluated and learning outcomes are shared.	RK-04
ELEMENT 11: Emergency Preparedness & Response	Plans, procedures and resources are in place to effectively respond to emergency situations, to protect people/employees, the environment (including the workplace) and the public, and to preserve the company's assets and reputation.	RK-04
ELEMENT 12: Assurance, Monitoring & Improvement	HSE performance and systems are monitored, audited and reviewed to identify trends, measure progress, assess compliance and drive continuous improvement. HSE Planning is an integral part of business planning with strategic objectives, goals and annual targets to drive performance improvement.	All HSE-related

HSE MS is applicable for all types of operations and projects; and manages operational integrity through the lifecycle of the assets. Requirement are applicable not only to MOL Group's own employees, but to contractors and subcontractors as well. In case of newly joining (acquired) companies an integration period of maximum three years is considered depending on maturity of its HSE management system, in order to catch up with the relevant Group level requirements. During this period, general principles of the HSE MS are applicable to the companies, but their HSE performance is not included into overall MOL Group HSE performance.

Element 7 - Environmental Stewardship describes the processes related to managing GHG emission related matters, including MOL Group's approach to reduce GHG emissions to minimise our impact on climate change and manage financial effects and risks associated with GHG emission related regulations and adaptation to climate change. Key commitments include:

- Eliminating routine flaring during normal operations, while non-routine flaring (e.g. during start-ups, shutdowns, emergency) is minimized. Routine venting is not an acceptable. Venting shall only be allowed in case of an emergency or malfunction and where it is feasible flaring has to be preferable to venting.
- Leak Detection and Repair (LDAR) program is in place for accurately quantifying and reducing the emission from fugitive sources.
- Greenhouse Gas Emissions (GHG) management system is in place:
    - (a) Methane, ETS I and II: local-level process descriptions are in place to ensure legal compliance.
    - (b) In each high GHG intensity businesses GHG reduction plans are in place and executed to ensure carbon neutrality.
    - (c) Compliance with the CBAM regulation is ensured.

The goal of the GHG management system is to help verify that the installations and regulated entities of MOL Group that are subject to EU ETS system (I and II) comply with legal requirements. The document details the process steps to monitor, calculate, verify, plan, forecast the GHG emissions of relevant operators subject to EU ETS I and ETS II. ETS quota inventory management processes are maintained to ensure limitation on CO2 inventories while also providing flexibility for Emitting Entities managing their business models. For more details on tasks and responsibilities, please refer to *Detailed rules on Environmental Stewardship (Element 7) - CO2 Management*, which is an Appendix to the HSE MS.

METRICS RELATED TO ENERGY CONSUMPTION AND MIX

/E1-5/

	UNIT OF MEASURE	2024	2023	ESRS
TOTAL ENERGY CONSUMPTION	MWh	27 183 633	27 924 988	E1-5_01, E1-5_19
Direct energy consumption	MWh	24 217 712	25 132 604	E1-5_16
o/w crude oil and petroleum products	MWh	16 408 214	18 094 965	E1-5_11
o/w natural gas	MWh	8 040 921	7 037 639	E1-5_12
Indirect energy consumption	MWh	2 734 498	2 792 384	E1-5_14
o/w renewable energy	MWh	102 181	140 109	E1-5_07
ENERGY INTENSITY (from activities in high climate impact sectors)	MWh/million HUF	2.96	-	

All energy consumption of MOL Group is accounted as activities in high climate impact sectors (therefore indicators related to high-climate sectors are not indicated separately). MOL Group's total energy consumption was 3.64% lower in 2024 compared to 2023. Both the direct energy consumption (fuels combusted in boilers, furnaces, heaters, turbines, flares, incinerators, generators, and company-owned vehicles and machines) and the indirect energy consumption (intermediate energy, i.e., heat, steam and electricity purchased from outside MOL Group) were lower.

MOL Group's energy intensity from activities in high climate impact sectors was 2.96 MWh/mn HUF in 2024. Since MOL Group does not have material revenues from sectors which are not considered high climate impact, Total Net sales are taken into account from the Consolidated Statement of Profit or Loss for the purpose of this calculation. Similarly, total energy consumption as presented in the above table is equivalent to the total energy consumption in high climate impact sectors.

As stated in the Shape Tomorrow Strategy, MOL Group is dedicated towards diversification of its energy sources towards renewable sources, however, its current business model is heavily reliant on fossil fuels. 67.75% of direct energy consumption in 2024 has been sourced from crude oil and petroleum products including, fuels distilled from crude oil, including LPG, compressed natural gas, LNG, butane, propane, ethane and refinery fuel gas used for the energy-intensive production processes (e.g., oil refining, petrochemical production); and gasoline, autogas, diesel used for company owned vehicles and for machines. 33.20% of consumed energy is from natural gas purchased and produced.

The share of renewable energy both in consumption and production remained below 0.5% (disclosed number is based on estimation as majority of the renewable energy production comes from solar panels placed in office buildings and service stations, which are out of the scope of the energy management system of MOL Group due to negligible energy intensity compared to industrial production) – even with new solar panels acquired at multiple locations in 2024.

METRICS RELATED TO GHG EMISSIONS

/E1-6/

GREENHOUSE GAS EMISSIONS	UNIT OF MEASURE	2024	2023	ESRS
Gross Scope 1 GHG emissions	**mn t CO2-eq**	**6.38**	**6.64**	E1-6_07
o/w Consolidated accounting group	mn t CO_2-eq	6.37	-	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO_2-eq	0.01	-	E1-6_02
o/w Upstream	mn t CO_2-eq	**0.86**	**0.91**	E1-6_03
o/w Downstream	mn t CO_2-eq	**5.41**	**5.69**	E1-6_03
o/w Refining	mn t CO_2-eq	3.14	3.29	E1-6_03
o/w Petrochemicals	mn t CO_2-eq	1.25	1.29	E1-6_03
o/w Power and Heat Generation	mn t CO_2-eq	0.98	1.07	E1-6_03
o/w Other downstream	mn t CO_2-eq	0.04	0.04	E1-6_03
o/w Midstream	mn t CO_2-eq	**0.08**	-	E1-6_03
o/w Others	mn t CO_2-eq	**0.03**	**0.04**	E1-6_03

GREENHOUSE GAS EMISSIONS	UNIT OF MEASURE	2024	2023	ESRS
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	**89.85**	**88.28**	E1-6_08
Gross location-based Scope 2 GHG emissions	mn t CO_2-eq	**0.65**	**0.61**	E1-6_09
o/w Consolidated accounting group	mn t CO_2-eq	0.64	-	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO_2-eq	0.01	-	E1-6_02
Gross market-based Scope 2 GHG emissions	mn t CO_2-eq	**0.92**	**0.81**	E1-6_10
o/w Consolidated accounting group	mn t CO_2-eq	0.90	-	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO_2-eq	0.02	-	E1-6_02
Total GHG Emissions Scope 1+2 – by business	mn t CO_2-eq	**7.03**	**7.25**	E1-6_03
Total GHG emission of Upstream (Scope 1 + Scope 2)	mn t CO_2-eq	0.92	0.97	E1-6_03
Total GHG emission of Downstream (Scope 1 + Scope 2)	mn t CO_2-eq	5.93	6.16	E1-6_03
o/w Total GHG emission of Refining (Scope 1 + Scope 2)	mn t CO_2-eq	3.33	3.46	E1-6_03
o/w Total GHG emission of Petrochemicals (Scope 1 + Scope 2)	mn t CO_2-eq	1.47	1.50	E1-6_03
Total GHG emission of Midstream (Scope 1 + Scope 2)	mn t CO_2-eq	0.08	-	E1-6_03

In 2024, our total Scope 1&2 GHG emissions decreased by around 5% compared to last year. This reduction was observed across all business segments and aligns with our transition plan, which included various energy efficiency and electrification projects from Upstream to Retail stations.

In the Upstream segment, flaring was eliminated at certain sites, which reduced gas consumption. At the Danube refinery, fuel oil usage was decreased through technical upgrades and optimized furnace operations. Energy consumption is monitored at the device level, focusing on operational energy use reduction. For instance, we optimize steam production at steam generators using Visual Mesa Software, and flaring is monitored daily. At Slovnaft, extensive turnarounds during 2024 resulted in total GHG emissions being less than 250 kt compared to 2023.

In MOL Petrochemicals, major energy efficiency projects were completed in 2024, including the introduction of a steam tracking system and compressor bypass optimization. Methane combustion in the HRSG system was optimized, reducing the plant's fuel consumption and Scope 2 emissions compared to 2023. To reduce venting, we focused on minimizing start-up losses by applying lessons learned and taking definitive actions with the production and energy management organization.

For our retail stations, energy and electricity consumption are regularly monitored, with stations equipped with LED lights and electrified heating methods. However, the primary driver for emission reduction was not only efficiency and electrification projects. In cases like Slovnaft, extensive turnarounds during 2024 were the main reason for the reduction.

CAT	GHG EMISSIONS SCOPE 3	UNIT OF MEASURE	2024	2023	ESRS
	Total GHG Emissions Scope 3	tonnes CO_2-eq	**56 538 921**	**55 767 391**	E1-6_11
1	**Purchased goods and services**	tonnes CO_2-eq	**1 854 922**	**1 827 952**	
	o/w purchased crude oil	tonnes CO_2-eq	1 393 206	1 348 802	
	o/w purchased biofuel	tonnes CO_2-eq	461 716	479 151	
2	**Capital Goods**	tonnes CO_2-eq	**18 321**	**20 287**	
3	**Fuel and Energy Related Activities**		*not measured (not material)*		
4	**Upstream Transportation and Distribution**	tonnes CO_2-eq	**240 478**	**226 209**	
5	**Waste Generated in Operations**		*not measured*		
6	**Business travel**		*not measured (not material)*		
7	**Employee Commuting**		*not measured (not material)*		
8	**Upstream Leased Assets**		*not applicable*		
9	**Downstream Transportation and Distribution**		*accounted under Scope 1*		
10	**Processing of Sold Products**	tonnes CO_2-eq	**873 417**	**1 005 048**	
11	**Use of sold products**	tonnes CO_2-eq	**52 430 648**	**51 478 543**	
	o/w sold refinery products (excl. naphtha)	tonnes CO_2-eq	48 546 393	47 426 000	
	o/w sold natural gas	tonnes CO_2-eq	3 884 255	4 052 543	
12	**End-of-life treatment of sold products**	tonnes CO_2-eq	**651 154**	**752 622**	
13	**Downstream Leased Assets**		*not applicable*		
14	**Franchises**		*not applicable*		
15	**Investments**	tonnes CO_2-eq	**469,982**	**456,728**	
	Total GHG (Scope 1 + Scope 2 location-based + Scope 3)	mn t CO_2-eq	**63.57**	**63.01**	E1-6_11
	Total GHG (Scope 1 + Scope 2 market-based + Scope 3)	mn t CO_2-eq	**63.84**	**63.22**	E1-6_13

In 2024, our Scope 3 emissions increased by around 1.4% compared to last year. This rise was primarily driven by higher purchases of crude oil, increased upstream transportation and distribution, and notably, the use of sold refinery products excluding naphtha. The 5% growth in our fuel product sales was a major contributor to this increase. On the positive side, we achieved notable reductions in certain Scope 3 categories compared to the previous year, including the processing of sold products (polymers), natural gas sales, and the end-of-life treatment of sold products (polymers).

Methodologies and significant assumptions behind metric

MOL Group's calculation methodology for Scope 1 and 2 GHG emissions is regulated by the Group's Reporting Handbook. The Group report carbon dioxide (CO2) and methane (CH4) emissions as part of its Scope 1 and 2 reporting.

Regarding Scope 1 calculation, there are two equally acceptable methods for calculating emissions from sources (energy, process and flares related), and the choice of method depends on the information available for input. Scope 1 CO2 emissions under the EU ETS are also externally verified.

One of the options is using the energy data. For each source or operation, the total consumption of fuel within the assessment period of each different fuel type is recorded. Where fuel property data is available, the fuel consumed is converted to an equivalent energy input in GJ using the average net calorific value of the fuel over the period. The emission of carbon dioxide is then calculated by multiplying the total energy input for each fuel type by a carbon dioxide emission factor for that fuel. The emission factor should be calculated based on actual fuel properties. Where fuel property data is not available, the IPCC emission factors should be used. This default factors should only be used where fuel data is not available and in preference to reporting no data.

The second option is using the mass data. In this case, the emission of carbon dioxide is calculated by multiplying the mass of fuel burnt by the carbon content of the fuel burnt, on the basis that all carbon is emitted as carbon dioxide. For gaseous fuel, the carbon content should include any carbon dioxide in the fuel. If the fuel flow is not metered, the fuel consumption should be estimated from the equipment load data such as specific fuel consumption of a gas turbine or the thermal output of a boiler. The emission of carbon dioxide is calculated from the mass of gas flared and the carbon content of the flared gas (including any inorganic carbon). The calculation should be done on the basis of 100% conversion to CO_2, and no correction to flare efficiency. The accuracy of the estimate is dependent on the reliability of the flow and composition data. Estimates of gas flared are generated using plant logs and engineering calculations based on process design information.

Scope 1 methane emission calculation has further specificities. Methane emissions could be due to venting, flares, process fugitives, combustion, chemical or refinery processes. In case of venting, the preferred method of methane determination is to carry out engineering estimates based on as much direct field measurement as is practical, including pressures, duration and number of venting operations, physical dimension and types of valves and chokes through which the venting is controlled, grabbing of samples of the gas being vented for analysis of the methane content, and flash calculations or correlation based on process simulations calculation. Regarding flares, methane is estimated using the assumption that the composition of methane in the emitted hydrocarbon is the same of the methane content of the flared hydrocarbons. The methane component of the leaked gas should be determined from the composition of fluids within the system. The basic assumption is that the leaking fluid has the same composition as the contained fluid.

Scope 2 emissions are calculated from information about the energy (steam and electricity) imported and exported across a facility boundary. Other indirect emissions, such as from offsite waste disposal, are specifically excluded. The emission of CO_2 is obtained by multiplying the net amount of energy imported by a CO_2 emission factor. The carbon emission factor to be applied depends on the source of the imported energy. The intent is to account for the CO_2 emissions from third parties as a consequence of generating energy for MOL Group.

Reporting boundaries, scope of calculation

- MOL Group is calculating and reporting GHG (scope 1 and 2) emissions that are arising from wholly owned and/or operated assets, excluding legal entities with only office/administrative activities.
- Scope 1 emission (direct emissions) are direct GHG emissions from sources that are owned or controlled by MOL Group. Scope 1 can include emissions from fossil fuels burned on site, emissions from entity-owned or entity-leased vehicles, and other direct sources.
- Scope 2 emissions (indirect emissions) are indirect GHG emissions resulting from the generation of electricity, heating and cooling, or steam generated off site but purchased by the entity, and the transmission and distribution (T&D) losses associated with some purchased utilities (e.g., chilled water, steam, and high temperature hot water).
- Scope 3 emissions include indirect GHG emissions from sources not owned or directly controlled by MOL Group but related to the entity's activities. They are a consequence of the activities of the company, but occur from sources not owned or controlled by the company. Some examples include third party deliveries, business travel activities and use of sold products and services

Calculation methodology:

Various methods are used for each categories included in our Scope 3 calculation, all based on GHG protocol. From our subsidiaries over which we have operational control, the data for following categories of Scope 3 are collected:

- Category 1 (Purchased biofuel & crude oil)
- Category 2 (Capital goods)
- Category 4 (Upstream transportation and distribution)
- Category 10 (Processing of sold polymers)
- Category 11 (Use of sold natural gas; use of sold refinery products)
- Category 12 (End-of-life treatment of sold polymers)
- Category 15 (Investments)

Categories included in Scope 3 GHG emission calculation:

- **Category 1 –Purchased Goods and Services** (bio-fuel for blending and purchased petroleum product for using as feedstock): MOL Group includes in its Scope 3 calculation the footprint of the externally produced crude oil purchased by MOL for processing in the Group's refineries. MOL Group also includes the gross footprint (GHG removals not included) of the biofuel produced externally and purchased for the blending into the Group's fuel. In line with EU regulation, each biofuel purchase transaction includes the CO_2 footprint of its production. For the calculation of CO_2 emissions, MOL Group uses the average-data method calculation and applies CO_2 conversion factors from the Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (LINK).

- **Category 2 - Capital Goods** (steel and concrete for construction): MOL Group includes in its Scope 3 calculation the footprint of the externally produced steel and concrete purchased by MOL Group. In 2024, we identified major CAPEX investments with the highest potential for steel and concrete usage. With confirmation from their project managers, these footprints have been included in the calculation. For the calculation of CO_2 emissions, MOL Group uses the average-data method calculation and applies CO_2 conversion factors from the World Steel Association (LINK) for steel and Global Cement and Concrete Association (LINK) for concrete.
- **Category 4 - Upstream transportation and distribution:** MOL Group includes in its Scope 3 calculation the footprint of the transportation of externally produces crude oil purchased by MOL for processing in the Group's refineries. For the calculation of GHG emission, MOL Group uses the distance-based method calculation and applies CO_2eq conversion factors from the Greenhouse gas reporting: conversion factors used for the 2024 GHG calculation were obtained from the UK Government (LINK) and CEFIC (LINK).
- **Category 10 - Processing of sold products:** MOL Group includes in its Scope 3 calculation the footprint of the processing sold intermediate petrochemical products (used for plastic). For the calculation of GHG emission, MOL Group uses the average-data method calculation and applies CO_2eq conversion factors based on product categories. Conversion factors used for the 2024 GHG calculation were obtained from a recent publication in Circular Economy and Sustainability (LINK) for polymer products.
- **Category 11 - Use of Sold Products** (Refinery excl. naphtha): As of 2024, for the CO_2 Emission Factor (conversion rates) of its different sold refinery products, MOL Group applies IPCC's emission factors for mobile (LINK) and stationary (LINK) combustion. The methodology includes references to “global warming potential” (GWP). MOL Group includes in the calculation the CO_2 impact of the following sold products: natural gas, diesel, motor gasoline (petrol), jet fuel, heating oil, LPG, fuel oil and petroleum coke. Naphtha is excluded as its byproducts are accounted for under Category 10 and 12. Sold fuel includes both own produced as well as purchased (traded) from third parties. As of 2020, MOL Group no longer calculates with natural gas produced, but with natural gas sold for the CO_2eq calculation.
- **Category 12 - End-of-Life Treatment of Sold Products** (polymers): This category includes the expected end-of-life emissions from polymer products sold during the accounting year, independent of the year in which they are actually disposed of. The Group's petrochemical sales (2024 MOL Group sales are available from the 2019-2024 Data Library) are made up polymers, butadiene and monomers (polymers make up around three quarters of total petrochemical sales). GHG Protocol Scope 3 Standard directs companies to consider estimating emissions for this category if they can reasonably estimate the downstream emissions associated with end use. Consequently, for the calculation of the End-of-Life Treatment of Sold Products calculation, only polymer sales have been considered, as emissions associated with end use can be reasonably estimated. The production of the Group's polymers (plastics) is made up of LDPE, HDPE and PP, with the first two accounting for around half the sales. The Group's polymers are manufactured by its two petrochemical plants in Hungary and Slovakia. As a result, most of the Group's polymers (LDPE, HDPE and PP) are sold on European markets. LDPE and HDPE are mostly sold for the packaging industry, whereas PP is sold to the automotive, agriculture, construction and packaging industries. It is assumed that the products would be used and disposed of in the countries to which MOL Group sold them, therefore EU disposal statistics from Plastics Europe's “The Circular Economy for Plastics - A European Overview” report (LINK) were applied for the end-of-life treatment of products based on their application: packaging, automotive, agriculture, construction and other. End-of-life treatment based emission factors used for the 2024 GHG emission calculation are based on a 2019 publication in Nature (LINK)
- **Category 15 – Investments:** Since 2020, MOL Group incorporated into the Scope 3 calculation the Scope 1 and 2 emissions of major non-operated JVs in both Upstream and Downstream. MOL Group follows the principle of conservativeness (i.e. erring on the side of overestimating rather than underestimating emissions)

Categories excluded from Scope 3 GHG emissions calculation:

- **Category 3 - Fuel- and Energy-related Activities:** As MOL Group is an integrated oil and gas company, it produces and consumes mainly its own fuels and energy and it is included in the Scope 1 and Scope 2 emission calculation, therefore Category 3 is not material for the company in the Scope 3 emission calculation.
- **Category 5 - Waste generated in operations:** currently not reported. Currently, boundaries are being determined and data is being collected for future reporting and disclosure.
- **Category 6 - Business Travel**: This is not a material source of Scope 3 emissions in MOL Group's value chain. Employees travelling for business-related transportation mainly use the MOL Group's own internal fleet which is accounted for under Scope 1.
- **Category 7 - Employee Commuting:** This is not a material source of Scope 3 emissions in MOL Group's value chain. Those commuting using MOL Group fleet cars are accounted for under Scope 1.
- **Category 8 - Upstream Leased Assets:** Not relevant. An emissions figure is not calculated for this category as MOL Group does not lease upstream assets in the course of normal operations.
- **Category 9 - Downstream Transportation and Distribution:** This is not a material source of Scope 3 emissions in MOL Group's value chain given the integrated nature of MOL Group. Downstream logistics is accounted for under Scope 1 emission.
- **Category 13 - Downstream leased assets:** This is not a material source of Scope 3 emissions in MOL Group's value chain as the only leased assets are the fleet of the MOL Fleet Solutions which are using cars owned by MOL Group. In addition, MOL fuel

cards are used to fuel cars of the fleet on MOL Petrol stations, therefore, fuel sales are already calculated under Scope 3 category 11 (use of sold products).

- **Category 14 - Franchises:** This is not a material source of Scope 3 emissions in MOL's value chain as all petrol stations are under MOL Group control. Franchised service stations constitute a small number of the total Group Service station network.

In terms of primary data obtained from our suppliers, we receive purchased biofuels certificate from our suppliers which we use in our Scope 3 calculation for category 1.

As mentioned in this Management Report's Management Discussion and Analysis under Biofuels in MOL Group section, MOL Group's biofuel purchase with regards to both supply points (9 countries) and concluded amount (>600 kilotons) remained stable in.

There has been no significant changes in our operations or supply chain which could possibly affect the year-to-year comparability of our GHG emissions.

The amount of biofuels purchased in 2024 is included in our Scope 3 calculation.

We do not disclose GHG intensity based on net revenue as changes in the GHG/net revenue do not reflect the effectiveness of GHG reduction targets, and revenue in O&G industry is generally determined by fluctuation in oil & gas quotations.

INTERNAL CARBON PRICING

/E1-8/

MOL Group applies internal carbon pricing as a shadow price to factor in the financial impact of carbon emissions, during:

- Capital expenditure and investment decisions
- Risk management and opportunity assessment
- Project development (organic/inorganic)
- Operations and value chain engagement
- Product development and R&D

This ensures consideration of potential future carbon costs arising from regulatory changes, market trends, and climate risks. Currently, the internal carbon pricing scheme applies to Scope 1 emissions under EU ETS, covering 89.85% in 2024. Carbon price premises are reviewed annually, incorporating EU ETS forecasts. MOL Group projects a continuous price increase until the 2040s, driven by free allocation phase-out and stricter benchmarks. After 2040, prices are expected to gradually decline as emissions decrease. The company discloses an ETS carbon price forecast of EUR 100-140/t by 2030 in its scenario analysis and capital market releases.

CO_2-related costs from EU ETS and the Hungarian CO_2 tax are embedded in financial planning and capital allocation. A key example is MOL Group's green hydrogen plant at the Danube Refinery, reducing CO_2 emissions by ~25 kt/year and mitigating EU ETS price risks. MOL Group ensures internal carbon pricing aligns with financial statements, including asset valuation and impairment calculations and fair value assessment of acquired assets. The company recognizes provisions for excess CO_2 emissions, factoring in market prices, forward contract rates, and Upstream Emission Reduction (UER) quotas for EU Fuel Quality Directive compliance.

EU TAXONOMY REPORT

Introduction and legal background

Based on Article 8 of Regulation (EU) 2020/852 (hereinafter Taxonomy Regulation)[15], undertakings - that are subject to an obligation to publish a non-financial statement or a consolidated non-financial statement pursuant to Article 19a or Article 29a of Directive 2013/34[16] of the European Parliament and of the Council, shall include in their non-financial statement or consolidated non-financial statement on how and to what extent their activities are associated with economic activities, that qualify as environmentally sustainable under Articles 3 and 9 of the Taxonomy Regulation. As part of that, the covered undertakings, including MOL Group shall disclose KPIs (key performance indicators) on the proportion of the turnover, capital expenditure (CapEx) and operating expenditure (OpEx) of their activities related to assets or processes associated with environmentally sustainable economic activities. Detailed description of each KPI and its calculation methodology can be found on page 11.

General approach

For financial year 2024, an extensive identification approach was conducted, with eligibility and alignment assessments for all environmental objectives contributing to climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems. This is possible with the publication of Delegated Regulation (EU) 2023/2486 of 27 June 2023[17] (hereinafter Environmental Delegated Act). Relevant activities for MOL Group are covered under Climate change mitigation, Climate change adaptation, Transition to circular economy and Pollution prevention and control, based on the Groups activity scope, however, all objectives are monitored for future investments. MOL Group has not identified any activity at CapEx, OpEx or Turnover level, which would contribute to multiple environmental objectives.

In terms of financial instruments, MOL Group has not issued any sustainability-linked or green bonds in the assessed periods, although it used sustainability-linked loans for funding.

Eligibility screening

An eligible economic activity is an economic activity that is listed and described under the EU Taxonomy regulation. The screening covered MOL Group core businesses in case of every consolidated activity and operation. The eligible items are identified with the help of the different businesses across the company. Furthermore, the eligibility screening is already incorporated into the project preparation process of the company, with several approval and cross-checking rounds. This is allowing MOL Group to identify every relevant project already in early phase of their lifecycle.

Alignment screening

In line with the EU Taxonomy assessment logic, alignment screening was completed in three steps. Compliance with technical screening criteria (TSC) has been assessed first, followed by the do no significant harm (DNSH) screening on activity level. Compliance with minimum social safeguards (MSS) has been assessed on the Group level.

MOL Group has screened some of its activity types in a group-level joint alignment assessment (including TSC and DNSH). The covered activities are the group level EV charger and solar activities, the Hungarian waste management network (operating under Circular Economy Services (CES) segment, controlled by MOHU MOL Waste management Zrt. (hereafter MOHU)) , and the Hungarian transmission and distribution networks for renewable and low-carbon gases. This joint assessment is possible, since these activity types are conducted in several sites (with large geographical extension) and with similar technical profile. Furthermore, the screened sites one by one are financially not significant at MOL Group level.

Technical Screening Criteria (TSC) monitoring

The Technical Screening Criteria are specific characteristics that can be used to determine whether an economic activity provides a substantial contribution to one of the environmental objectives. Pre-selected eligible activities were subject to a technical screening criteria (TSC) monitoring as the first step to proving their alignment. For the TSC screening the responsible project managers and business departments have been contacted with internal assessment templates. The templates aim to translate the EU Taxonomy legislative criteria into MOL Group language and providing a step-by-step guidance with binding content for project teams.

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[15] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088

[16] Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (Text with EEA relevance)

[17] Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

Do no significant harm (DNSH) screening

Activities fulfilling technical screening criteria have been tested against the do no significant harm (DNSH) requirements of the remaining five environmental objectives. To prove the activities alignment with the DNSH criteria, a detailed assessment has been carried out.

Appendix A screening (i.*e. compliance with Climate change adaptation criteria*)[18] has been conducted for every aligned activity. In order to deliver climate risk and vulnerability assessment for the relevant activities, already existing in-house expertise and knowledge on risk management has been combined with the EU Taxonomy additional requirements – and integrated to a specific Appendix A framework.

For the future climate scenarios, IPCC (Intergovernmental Panel on Climate Change) and EEA (European Environmental Agency) sources have been used in the assessment – as referred to in Appendix A requirements. Furthermore, to select the material physical climate risks, the European Climate Adaptation Platform (Climate-ADAPT)[19] database has been applied.

A conservative approach has been implemented during the assessment and the worst-case scenario; the RCP 8.5 pathway was examined[20]. The latest available climate scenarios were used. Future scenarios were analysed until 2050. Due to the geographical proximity and due to the similar climate profile of the main operational countries of MOL Group, the applied scientific framework examined them as one region, so as Western and Central Europe (for example in the IPCC projections). Due to this reason in the risk assessments all material physical climate risks have been screened relevant to this area. The material physical climate risks have been assessed in the scenarios as detailed above, taking into account the likelihood and impact on the Group and adaptation plan defined whenever necessary.

According to the methodology of MOL Group in case of the group level EV charger, solar activities, and the Hungarian transmission and distribution networks a group level joint climate risk and vulnerability assessment has been conducted. This approach was also conducted with waste management site screenings based on the high number of sites with similar profiles in the Hungarian region.

During proofing compliance with criteria set out by **Appendix B**[21] (*i.e. compliance with Sustainable use and protection of water and marine resources criteria*) and **Appendix D**[22] (*i.e. compliance with Protection and restoration of biodiversity and ecosystems criteria*) screening, operational permits have been reviewed with the help of the relevant permitting departments within the company. According to the screening process the compliance can be fulfilled either by IPPC certificate, or Environmental Impact Assessment (EIA) or by further environmental permits. A further option is that based on local law Environmental Impact Assessment is not required in case of the activity and the criteria is not relevant due to the nature of the activity. In order to proof the compliance an internal screening template have been created. The Appendix B and D screening was conducted by involving project managers, HSE and permitting experts.

During the screening of **Appendix C[23]** (*i.e. compliance with Pollution prevention and control criteria*) screening was conducted according to the appendix elaborated under this environmental objective. Criteria defined by the points "a"-"f" have been assessed in details with an internal screening template. In case of a relevant activity the internal REACH expert is involved into the assessment.

The transition to a circular economy and other DNSH criteria defined by the regulation have been assessed on a case-by-case basis, as these criteria are not uniform across all activities but differ depending on the specific activity. Since each activity has its own environmental impacts and challenges, the criteria applied vary to align with the specific environmental and sustainability objectives of each activity.

Minimum social safeguards (MSS) assessment

Basis of detailed assessment was the Final Report on Minimum Safeguards[24] issued by the Platform on Sustainable Finance, focusing on human rights, anti-corruption, fair competition and taxation.

MOL Group respects fundamental human rights, its Code of Ethics and Business Conduct[25] includes the company's commitments. MOL Group respects the Universal Declaration of Human Rights, which summarizes fundamental human rights in 30 articles and further guidance documents on human rights such as the UN Global Compact, the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises and the ILO Declaration on Fundamental Principles and Rights at Work and voluntary principles about security and human rights. Furthermore, the MOL Group Compliance & Ethics department

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[18] Appendix A (Generic Criteria for Climate Change Adaptation) of ANNEX I of Delegated Regulation (EU) 2021/2139
[19] The European Climate Adaptation Platform Climate-ADAPT (2024)
[20] COMMISSION NOTICE on the interpretation and implementation of certain legal provisions of the EU Taxonomy Climate Delegated Act establishing technical screening criteria for economic activities that contribute substantially to climate change mitigation or climate change adaptation and do no significant harm to other environmental objective (C/2023/267), Question 168
[21] Appendix B (Generic Criteria for DNSH to Sustainable Use and Protection of Water and Marine Resources) of ANNEX I of Delegated Regulation (EU) 2021/2139
[22] Appendix D (Generic Criteria for DNSH to Protection and Restoration of Biodiversity and Ecosystems) of ANNEX I of Delegated Regulation (EU) 2021/2139
[23] Appendix C (Generic Criteria for DNSH to Pollution Prevention and Control Regarding Use and Presence of Chemicals) of ANNEX I of Delegated Regulation (EU) 2021/2139
[24] Final Report on Minimum Safeguards, Platform on Sustainable Finance, October 2022
[25] Code of Ethics and Business Conduct (2024) MOL Group

operates a corporate grievance mechanism (*Speak-Up!*), whereas the internal and external parties have the possibility to report every ethics related issue, including any concern regarding the human rights. During the 2024 financial year MOL Group did not faced with any human rights related violation, similar to previous years.

Integrity and transparency are important values for MOL Group and fighting against corruption is an essential part of our corporate strategy. MOL Group respects guidance documents on anti-corruption like the UN Global Compact, OECD Guidelines for Multinational Enterprises, United Nations Convention against Corruption (UNCAC) and takes into consideration suggestions of Transparency International, and the World Economic Forum Partnering Against Corruption Initiative (PACI). The anti-corruption policy is part of Code of Ethics and Business Conduct. MOL Group has well operated Ethics Management System including an annual group level mandatory training program and regulated speak-up channel for internal and external colleagues. MOL Group has special Anti-Fraud & Investigation department to prevent, detect, deter, investigate, sanction fraudulent / corrupt risks and practices.

MOL Group is dedicated to practice fair market behaviour; its activities on the market must be conducted in accordance with the norms of fair competition and the spirit and letter of applicable competition law.

Fully complying with competition law is not only a legal obligation but it is related to attitudes and cultures that can positively impact a company's business. The aim of our Compliance Program is to raise the awareness of our employees and to eliminate legal risks, thus supporting the effective implementation of business strategies in a legal way. Group Compliance organization has a constantly adjusted scope to the changing regulatory and business environment (Group Compliance Plan), which focuses on those compliance risks that require engagement on corporate level, e.g. competition law. Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing group-level trainings to increase awareness. Group Compliance has its dedicated experts. In-house investigations and simulations aiming at monitoring compliance with internal and external commitments are being performed.

Regarding taxation the company has an adequate governance structure in place to ensure full tax compliance and tax transparency. The company or its subsidiaries has not been convicted on violating tax laws during the 2024 financial year.

Financial methodology

In terms of the assessment of the EU Taxonomy eligible and aligned activities and calculation of the mandatory KPIs such as turnover, OpEx and CapEx as the main rule MOL Group followed the requirements defined by the Disclosure Delegated Act (EU 2021/2178)[26], however, in some cases materiality thresholds and simplification considerations have been applied as described in below sections.

KPI related to turnover (turnover KPI)

For the KPI calculation the consolidation system was used for the reporting. The data for the reporting process was collected and cross-checked by the responsible finance teams.

The turnover KPI's numerator calculation is based on the turnover of the identified eligible and aligned activities of MOL Group. In the case of profit centers where both eligible and non-eligible turnover was identified, only the turnover related to the eligible products was collected and calculated. The same logic is applied in case of aligned, and non-aligned activities. To avoid double counting, only third-party external turnover is considered in the calculation. No materiality threshold has been applied, and all relevant activities independently from the magnitude of contribution to the Group Turnover have been considered. The turnover KPI's denominator is the same as the Net Sales line in the Consolidated Statement of Profit or Loss and can be found on page 15 of the Consolidated Financial Statements of the Annual Financial Report.

KPI related to operating expenditure (OpEx KPI)

OpEx KPI has been calculated even for the profit centers, the individual reporting units of value creation with impact on both costs and revenues, where sustainable turnover has not been identified. Furthermore, the OpEx spendings of the CapEx projects have been involved into the OpEx KPI.

In the case of OpEx KPI the not-relevant OpEx items (such as Personnel-Type Expenses (PTE), charged services (allocated internal functional costs), energy and raw material) were deducted first, otherwise the calculation was done using the consolidation system, by taking into account all the relevant general ledger accounts based on the methodology defined by the Disclosure Delegated Act.

[26] Supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation (EU 2021/2178)

For the numerator calculation in the case of profit centers where both eligible and non-eligible OpEx was identified, only OpEx related to the eligible products was collected and calculated. In case of production units (especially in the case of Annex I/ 3.14 Manufacture of organic basic chemicals activity) allocation keys are applied in the OpEx KPI allocation, based on the production volume of the EU Taxonomy eligible product. The same logic has been applied in the case of aligned, and non-aligned activities.

MOHU related OpEx alignment screening was conducted in 2024, with extensive assessment of processes. Activities were analyzed on a subcontractor level, with the inclusion of TSC and DNSH criteria.

For the denominator calculation the total Group level amount of the relevant general ledger accounts have been accounted.

The data for the reporting process was collected and cross-checked by the segment finance teams. An 1-9 test report was taken place in order to prepare the organisation for the 1-12 reporting process and to demonstrate preliminary result for the organisation.

Overall, the OpEx KPI is considered as less material for the description of MOL Group's EU Taxonomy related activities.

KPI related to capital expenditure (CapEx KPI)

In the case of CapEx KPI the central CapEx reporting and monitoring tool of MOL Group has been used. In the system already from early phase the EU Taxonomy relevancy of the projects are marked. The data was provided and cross-checked by the Group Sustainable Investment Solutions team (responsible for CapEx resource allocation). Throughout the year the MOL Group issues an internal monthly EU Taxonomy report in order to track the relevant CapEx spendings.

Concerning the CapEx definition used in this database and the definitions used in the Taxonomy Regulation the following comments must be taken: the central CapEx reporting and monitoring tool of MOL Group does not include additions from borrowing costs, right-of-use assets, estimated field abandonment and site restoration costs. MOL Group believes, that these differences do not have a material impact on the numerator of the KPI. For the numerator the relevant (eligible and/or aligned) realized capital expenditure of investment projects for the respective financial year 2024 has been considered.

In the case of CapEx KPI a materiality threshold of USD 100 thousand has been applied. The CapEx figure used as the denominator is comparable with the figure on page 20 of the Consolidated Financial Statements of the Annual Financial Report. The CapEx KPI's denominator is the same as the Additions and capitalizations plus Acquisition of subsidiaries line in the Property, plant and equipment movement table, additions of Investment property and the Additions plus Acquisition of subsidiary line in the Intangible asset movement table. In case of related sustain type of investments by the eligible or aligned operations (cost center & company or site), investments will be calculated automatically as eligible or aligned. These investments are supporting the day-to-day running of the eligible/aligned business activity of MOL Group.

Contextual information about the KPIs

EU Taxonomy eligible activities in turnover is 9.3%, in OpEx 28.4%, in CapEx 21.0% for the year 2024. EU Taxonomy aligned activities in turnover is 0.5%, in OpEx 5.5%, in CapEx 7.3% for the year 2024.

Relatively low alignment percentages are partially result of the previously demonstrated facts, that significant part of MOL Group's activities is still related to the oil and gas industry and a conservative approach has been followed in the assessment and reporting.

Furthermore, MOL Group won[27] the Hungarian state concession tender through MOHU (MOHU MOL Hulladékgazdálkodás Zrt.) for waste management services in July 2022, and started the operations on 1st of July 2023 supporting our aspiration to become a key player in the circular economy. MOL Group is responsible for the collection, transportation, pre-treatment, handling over to treatment, sales operations and operating EPR and DRS systems of the municipal solid waste and committed to make circular economy related investments. For the first time in 2024, these investments and economic activities were screened on alignment level.

Turnover

The eligible turnover proportion in 2024 is 9.3%, which is similar to the previous year (9.6%). The aligned turnover proportion increased to 0.5% from last year's 0.2%. The similar results in the eligible turnover proportion are due to our similar EU Taxonomy related activity portfolio compared to 2023 financial year. The increase in aligned turnover percentage is due to the waste management segment (MOHU), which is reported on alignment level for the first time this year. However, even though significant proportion of MOHU is related to the transition to circular economy environmental objective,

[27] MOL wins concession for waste management services (2022). molgroup.info

the turnover of this subsidiary is limited compared to the total of MOL Group. MOL Group will continue its journey of smart transition, contributing to both sustainability and competitiveness at the same time. That is, alongside with its promising low carbon and green investment projects, will generate a growing EU Taxonomy related revenue in the upcoming years.

Aligned activities are associated with the following activity categories:

- *2.3. Collection and transport of non-hazardous and hazardous waste,* linked to MOHU, as the sole operator of the Hungarian waste management system.
- *2.6. Depollution and dismantling of end-of-life products,* is a key activity within MOHU, which aims material recovery and preparation for re-use from complex end-of-life products in several sites in Hungary.
- *2.7. Sorting and material recovery of non-hazardous waste,* linked to MOHU, dedicated to return as much high quality secondary raw material as possible to the economy, minimizing the waste stored in landfills.
- *3.17. Manufacturing of plastics in primary form*, linked to ReMat operations. In April 2022 MOL Group acquired ReMat, Hungary's market leading plastics recycling company, using communal and industrial waste for creating recycled plastic granules. With this transaction MOL Group's total capacity of recycled plastic material was raised from 25,000 tons/year to 40,000 tons/year.
- *4.1. Electricity generation using solar photovoltaic technology*, linked to solar operations activity in Hungary and Croatia. MOL Group stepped into the solar power business in 2018, with the building of photovoltaic powerplants. MOL Group is currently having around 31 MW solar capacity in Hungary and 14 MW in Croatia.
- *5.9. Material recovery from non-hazardous waste*, covering Aurora Kunststoffe Gmbh activities and rubber bitumen production of Zala Refinery, Hungary. MOL Group acquired Aurora Kunstoffe Gmbh in 2019 and strengthened its presence in recycle-based compounds and its position as an automotive supplier. This transaction supported MOL Group's ambition to transform its fuel-based business model in Downstream to a higher value-added petrochemical product portfolio. The rubber bitumen plant started its operation in 2020 in Zalaegerszeg, Hungary and applies a new manufacturing technology of crumb rubber, which is made from bitumen and waste tyres and has been developed jointly by MOL and Pannon University. The rubber bitumen has several advantages compared to the conventional road construction bitumen as it has a longer lifecycle, better resistance on environmental impacts as well as providing an improved traffic safety due to the reduced braking distance.
- *6.4. Operation of personal mobility device, cycle logistics*, covering operation in Bratislava, Slovakia. Bike sharing activity has been the first initiative of MOL Group in the mobility field in the year 2014.
- *6.5. Transport by motorbikes, passenger cars and light commercial vehicles*, attributable to another building block of our mobility services, through providing leasing services, including financing and fleet management for MOL Group and external clients. The transitional economic activity[28] could be proven to be aligned only partially, as not the entire car park is compliant with the 'low- and zero-emission light-duty vehicles' (lower than 50gCO2/km emission) criteria. With the continuous modernization of the fleet, the percentage of environmentally friendly vehicles is expected to grow year by year.
- *6.15. Infrastructure enabling low-carbon road transport and public transport* enabling economic activity[29] is linked to our electric vehicle charging station network, covering nearly 300[30] EV chargers in the CEE region. E-mobility is also one of the key pillars of our mobility solutions.

For details, please see *Table 1*

[28] As it is stated in our long-term Shape Tomorrow Strategy, MOL Group aims to provide complex mobility services in order to reach its sustainability targets. Increasing the zero and low carbon emission vehicles share within our portfolio is in line with this aspiration. In that way as referred in Article 10(2) of Regulation (EU) 2020/852 we consider this activity as transitional, as there are no technologically and economically feasible low-carbon alternatives for it, but the activity supports the transition to a climate-neutral economy in a manner that is consistent with a pathway to limit the temperature increase to 1.5 degrees Celsius above pre-industrial levels.
[29] Based on the Article 16 of Regulation (EU) 2020/852 the EV charger activity of MOL Group is covering the enabling economic activity category, since it enables other activities to make a substantial contribution to one or more of the environmental objectives, as it enables the operation of low-carbon road transport and public transport. Furthermore, the activity does not lead to a lock-in in assets that undermine long-term environmental goals, considering the economic lifetime of its assets, as currently there is no better widespread technology, which enables the operation of electric vehicles. Furthermore, the technology supports the European environmental target to phase out the ICE motors. In addition, the activity has a substantial positive environmental impact on the basis of lifecycle considerations, since the components of the EV chargers are over 90% recyclable.
[30] Status as of 31 December 2024

Financial year 2024	Year 2024			Substantial contribution criteria						DNSH (Do No Significant Harm) (h)									
Economic activities	Code (a)	Turnover (USDmn)	Proportion of Turnover, year 2024	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) turnover, year 2023	Category (E: enabling activity)	Category (T: transitional activity)
				Y; N/N/EL (b)(c)	Y; N/N/EL (b)(c)	Y; N/N/EL (b)(c)	Y; N/N/EL (b)(c)	Y; N/N/EL (b)(c)	Y; N/N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. **Environmentally sustainable activities (Taxonomy-aligned)**																			
Collection and transport of non-hazardous and hazardous waste	CE 2.3	10.7	0.0%				Y				Y	Y		Y		Y	0.0%		
Depollution and dismantling of end-of-life products	CE 2.6	17.2	0.1%				Y				Y	Y		Y	Y	Y	0.0%		
Sorting and material recovery of non-hazardous waste	CE 2.7	52.6	0.2%				Y				Y	Y		Y	Y	Y	0.0%		
Manufacture of plastics in primary form	CCM 3.17	10.3	0.0%	Y							Y	Y		Y	Y	Y	0.0%		T
Electricity generation using solar photovoltaic technology	CCM 4.1	6.3	0.0%	Y							Y		Y		Y	Y	0.0%		
Material recovery from non-hazardous waste	CCM 5.9	17.1	0.1%	Y							Y				Y	Y	0.1%		
Operation of personal mobility devices, cycle logistics	CCM 6.4	0.0	0.0%	Y							Y		Y			y	0.0%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	2.4	0.0%	Y							Y		Y	Y		Y	0.0%		T
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1.4	0.0%	Y							Y	Y	Y	Y	Y	Y	0.0%	E	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		118.0	0.5%														0.2%		
Of which enabling		1.4	0.0%														0.0%	E	
Of which transitional		12.7	0.1%														0.1%		T
A.2 **Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)** (g)																			
				Y;N/EL (f)	N/EL (	N/EL (	N/EL (	N/EL (	N/EL (										
Collection and transport of non-hazardous and hazardous waste	CE 2.3	217.6	0.9%				Y										1.1%		
Treatment of hazardous waste	CE 2.4	0.0	0.0%				Y										0.0%		
Recovery of bio-waste by anaerobic digestion or composting	CE 2.5	0.0	0.0%				Y										0.0%		
Depollution and dismantling of end-of-life products	CE 2.6	27.3	0.1%				Y										0.1%		
Sorting and material recovery of non-hazardous waste	CE 2.7	265.5	1.1%				Y										0.3%		
Manufacture of organic basic chemicals	CCM 3.14	566.8	2.3%	Y													2.7%		
Manufacture of plastics in primary form	CCM 3.17	1110.9	4.4%	Y													4.9%		
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	7.7	0.0%	Y													0.0%		
Electricity generation from fossil gaseous fuels	CCM 4.29	0.1	0.0%	Y													0.0%		
Composting of bio-waste	CCM 5.8	0.0	0.0%	Y													0.0%		
Material recovery from non-hazardous waste	CCM 5.9	0.0	0.0%	Y													0.2%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	27.0	0.1%	Y													0.1%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		2222.9	8.8%														9.4%		
Turnover of Taxonomy eligible activities (A.1+A.2)		2340.9	9.3%														9.6%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-noneligible activities		22 789.68	90.7%																
TOTAL		25 130.54	100%																

Proportion of Turnover / Total Turnover	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	32%	75%
Climate change adaptation (CCA)	0%	0%
Sustainable use and protection of water and marine resources (WTR)	0%	0%
Transition to a circular economy (CE)	68%	25%
Pollution prevention and control (PPC)	0%	0%
Protection and restoration of biodiversity and ecosystems (BIO)	0%	0%

Table 1: Proportion of turnover from products or services associated with Taxonomy eligible and aligned economic activities

Operating expenditure (OpEx)

The eligible OpEx proportion in 2024 is 28.4%, which is significantly higher than in the previous financial year (19.4%). The aligned OpEx proportion is 5.5% , which is five times of the value than what was reported in the previous year (0.9%). The significantly higher eligible OpEx result in 2024 FY compared to last year is due to a more sophisticated OpEx methodological approach by MOHU. Furthermore, MOHU is reported on alignment level for the first time, hence the significant increase in aligned OpEx. The same aligned activity categories are valid in the case of OpEx as in the turnover.

For details, please see *Table 2*.

Financial year 2024	Year 2024			Substantial contribution criteria						DNSH (Do No Significant Harm) (f)									
Economic activities	Code (a)	OpEx (USDmn)	Proportion of OpEx, year 2024	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum safeguards	Proportion of Taxonomyaligned (A.1.) or -eligible (A.2.) OpEx, year 2023	Category (E: enabling activity)	Category (T: transitional activity)
				Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. **Environmentally sustainable activities (Taxonomy-aligned)**																			
Collection and transport of non-hazardous and hazardous waste	CE 2.3	10.1	0.6%				Y				Y	Y		Y		Y	0.0%		
Depollution and dismantling of end-of-life products	CE 2.6	14.8	0.9%				Y				Y	Y		Y	Y	Y	0.0%		
Sorting and material recovery of non-hazardous waste	CE 2.7	56.3	3.4%				Y				Y	Y		Y	Y	Y	0.0%		
Manufacture of plastics in primary form	CCM 3.17	2.5	0.2%	Y							Y	Y		Y	Y	Y	0.2%		T
Electricity generation using solar photovoltaic technology	CCM 4.1	0.9	0.1%	Y							Y		Y		Y	Y	0.0%		
Material recovery from non-hazardous waste	CCM 5.9	5.8	0.3%	Y							Y				Y	Y	0.5%		
Operation of personal mobility devices, cycle logistics	CCM 6.4	0.0	0.0%	Y							Y		Y			Y	0.0%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.6	0.0%	Y							Y		Y	Y		Y	0.0%		T
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.3	0.0%	Y							Y	Y	Y	Y	Y	Y	0.0%	E	
OpEx of environmentally sustainable activities(Taxonomy-aligned) (A.1)		91.3	5.5%														0.9%		
Of which enabling		0.3	0.0%														0.0%	E	
Of which transitional		3.2	0.2%														0.3%		T
A.2 **Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)** (f)																			
				Y;N/EL (e)	Y;N/EL (e)	Y;N/EL (e)	Y;N/EL (e)	Y;N/EL (e)	Y;N/EL (e)										
Treatment of hazardous waste	PPC 2.2	4.8	0.3%					Y									0.2%		
Collection and transport of non-hazardous and hazardous waste	CE 2.3	192.4	11.7%				Y										10.0%		
Treatment of hazardous waste	CE 2.4	0.0	0.0%				Y										0.1%		
Recovery of bio-waste by anaerobic digestion or composting	CE 2.5	0.0	0.0%				Y										0.2%		
Depollution and dismantling of end-of-life products	CE 2.6	26.8	1.6%				Y										0.8%		
Sorting and material recovery of non-hazardous waste	CE 2.7	104.6	6.3%				Y										2.8%		
Manufacture of organic basic chemicals	CCM 3.14	8.6	0.5%	Y													0.6%		
Manufacture of plastics in primary form	CCM 3.17	23.6	1.4%	Y													2.3%		
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	0.0	0.0%	Y													0.2%		
Electricity generation from fossil gaseous fuels	CCM 4.29	0.0	0.0%	Y													0.0%		
Construction, extension and operation of waste water collection and treatment	CCM 5.3	9.3	0.6%	Y													0.9%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	7.2	0.4%	Y													0.5%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		377.3	22.9%														18.6%		
OpEx of Taxonomy eligible activities (A.1+A.2)		468.6	28.4%														19.4%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-noneligible activities		1182.4	71.6%																
TOTAL		1651.0	100.0%																

Proportion of OpEx / Total OpEx	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	11.1%	12.6%
Climate change adaptation (CCA)	0.0%	0.0%
Sustainable use and protection of water and marine resources (WTR)	0.0%	0.0%
Transition to a circular economy (CE)	88.9%	86.4%
Pollution prevention and control (PPC)	0.0%	1.0%
Protection and restoration of biodiversity and ecosystems (BIO)	0.0%	0.0%

Table 2: Proportion of OpEx from products or services associated with Taxonomy eligible and aligned economic activities

Capital expenditure (CapEx)

The eligible CapEx proportion is 21.0% in 2024, which is slightly lower than what was reported in the previous year (24.1%). The aligned CapEx proportion is 7.3% , which is similar to the last year's alignment rate (8.6%). Some of the significant EU taxonomy aligned projects started in the previous years have reached the state of mechanical completion in 2024. Nearly half of the aligned CAPEX is due to MOHU, which is reported on alignment level for the first time this year. Most of the CAPEX spending is in the collection and transportation of non-hazardous and hazardous waste category. In line with our strategy, MOL Group is committed towards the smart green transition, due to that reason in the upcoming years the company is planning to further develop its low-carbon and EU Taxonomy aligned project portfolio in nearly all of the segments.

Aligned investments are associated with the following activity categories:

- *CE 2.3. Collection and transport of non-hazardous and hazardous waste,* related to projects in the Circular Economy Services segment of MOL Group, specifically related to MOHU operations. The most significant projects were the Deposit Refund System (DRS) and the purchase of waste management vehicles. MOL group is committed to the renewal of the waste management fleet with new, modern and sustainable vehicles as well as constructing state of the art waste yards to ensure the most efficient utilization of waste, channelling back to circular economy as much of it as possible.
- *CE 4.1. Provision of IT/OT data-driven solutions and software,* related to downstream. The project aims to provide continuous digital support for bio-compliance with the RED III directive.
- *CCM 3.10. Manufacture of hydrogen*, related to projects in green hydrogen production technology. In April 2022 MOL Group announced the building of a 10MW green hydrogen plant in Százhalombatta, Hungary. The total investment will be around EUR 22mn, allowing MOL Group to produce 1600 tons per annum of green hydrogen, resulting in around 25 thousand tons of CO2 saving with the use of renewable electricity. Furthermore, a new hydrogen unit in INA Rijeka Refinery, Croatia is under construction to supply the market with 1500 tonnes of hydrogen per year.
- *CCM 3.14. Manufacture of organic basic chemicals,* covering a new Olefins Conversion Technology (OCT) Unit construction at MOL Petrochemicals' site in Tiszaújváros, Hungary. The unit will have a production capacity of 100,000 tons/year of polymer grade propylene. The project was expected to reach its mechanical completion in 2024, however due to reasons outside of our control, the expected date of mechanical completion is modified to 2026.
- *CCM 4.1. Electricity generation using solar photovoltaic technology*, related to solar power plant constructions in Hungary and Slovakia, supporting our operations with green electricity generation.
- *CCM 4.13. Manufacture of biogas and biofuels for use in transport and of bioliquids*, linked to INA, is a project aiming to place advanced biofuel on the market in line with the RED III directive of EU. The project is still in its early phase, but once it is completed it will be able to produce 3kt of biomethane per annum in Sisak industrial site.
- *CCM 4.14. Transmission and distribution networks for renewable and low-carbon gases,* linked to our gas midstream operation, focusing on pipeline development related investments enabling transportation of hydrogen blended natural gas, including installation of hydrogen resistant equipment.
- *CCM 4.16. Installation and operation of electric heat pumps*, linked to the reconstruction of industrial heating and cooling systems with efficient, sustainable and environmentally friendly technologies.
- *CCM 4.25. Production of heat/cool using waste heat*, linked to the new hazardous waste incinerator unit in Danube Refinery, estimated to be completed in 2027.
- *CCM 6.15. Infrastructure enabling low-carbon road transport and public transport*, related to the extension of our electric vehicle charging station network in the CEE region.
- *CCM 6.5. Transport by motorbikes, passenger cars and light commercial vehicles* is linked to the purchase of new vehicles for our mobility services.
- *CCM 7.3. Installation, maintenance and repair of energy efficiency equipment* is related to the energy efficiency improvement of buildings in the core countries of MOL Group.
- *CCM 9.1. Close to market research, development and innovation* is linked to GINOP project, which aims to set up a site level methane emission monitoring system suitable for gas delivery stations and hubs.

For details, please see *Table 3*.

Financial year 2024	Year 2024			Substantial contribution criteria						DNSH (Do No Significant Harm)									
Economic activities	Code (a)	CapEx (USDmn)	Proportion of CapEx (%)	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystem	Minimum safeguards	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, 2023	Category (E: enabling activity)	Category (T: transitional activity)
				Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	Y; N;N/EL (b)(c)	(Y; N)	(Y; N)	(Y; N)	(Y; N)	(Y; N)	(Y; N)	(Y; N)	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. **Environmentally sustainable activities (Taxonomy-aligned)**																			
Collection and transport of non-hazardous and hazardous waste	CE 2.3	68.1	3.3%				Y				Y	Y		Y		Y	0.0%		
Provision of IT/OT data-driven solutions and software	CE 4.1	0.1	0.0%				Y				Y	Y		Y		Y	0.0%	E	
Manufacture of hydrogen	CCM 3.10	2.4	0.1%	Y							Y	Y		Y	Y	Y	1.0%		
Manufacture of organic basic chemicals	CCM 3.14	51.8	2.5%	Y							Y	Y		Y	Y	Y	6.5%		T
Electricity generation using solar photovoltaic technology	CCM 4.1	9.1	0.4%	Y							Y		Y		Y	Y	0.3%		
Manufacture of biogas and biofuels for use in transport and of bioliquides	CCM 4.13	1.4	0.1%	Y							Y	Y		Y	Y	Y	0.0%		
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	7.1	0.3%	Y							Y	Y		Y	Y	Y	0.4%		
Installation and operation of electric heat pumps	CCM 4.16	0.2	0.0%	Y							Y	Y	Y	Y		Y	0.0%		
Production of heat/cool using waste heat	CCM 4.25	3.1	0.1%	Y							Y		Y	Y	Y	Y	0.0%		
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5	2.9	0.1%	Y							Y		Y	Y		Y	0.2%		T
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1.4	0.1%	Y							Y	Y	Y	Y	Y	Y	0.1%	E	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	3.9	0.2%	Y							Y			Y		Y	0.1%	E	
Close to market research, development and innovation	CCM 9.1	0.6	0.0%	Y							Y	Y	Y	Y	Y	Y	0.0%	E	
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		152.0	7.3%														8.6%		
Of which enabling		6.0	0.3%														0.1%	E	
Of which transitional		54.7	2.6%														6.7%		T
A.2 **Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)**(g)																			
				Y;N/EL (F)	Y;N/EL (F)	Y;N/EL (F)	Y;N/EL (F)	Y;N/EL (F)	Y;N/EL (F)										
Collection and transport of non-hazardous and hazardous waste	CE 2.3	6.6	0.3%				Y										4.0%		
Manufacture of organic basic chemicals	CCM 3.14	201.4	9.7%	Y													6.6%		
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14	5.6	0.3%	Y													0.0%		
Electricity generation from fossil gaseous fuels	CCM 4.29	1.8	0.1%	Y													0.2%		
Renewal of water collection, treatment and supply systems	CCM 5.2	1.6	0.1%	Y													0.1%		
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5	45.7	2.2%	Y													1.7%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	21.9	1.1%	Y													1.0%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		284.7	13.7%														15.5%		
CapEx of Taxonomy-eligible activities (A.1+A.2)		436.8	21.0%														24.1%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities		1644.0	79.0%																
TOTAL		2080.8	100%																

Proportion of CapEx / Total CapEx	Taxonomy-aligned per objective	Taxonomy-eligible per objective
Climate change mitigation (CCM)	55%	83%
Climate change adaptation (CCA)	0%	0%
Sustainable use and protection of water and marine resources (WTR)	0%	0%
Transition to a circular economy (CE)	45%	17%
Pollution prevention and control (PPC)	0%	0%
Protection and restoration of biodiversity and ecosystems (BIO)	0%	0%

Table 3: Proportion of CapEx from products or services associated with Taxonomy eligible and aligned economic activities

Complementary Delegated Act

Based on the modifications implemented by Delegated Regulation (EU) 2022/1214 (Complementary Climate Delegated Act)[31] MOL Group – in accordance with Article 8 paragraphs 6,7 and 8 of Delegated Regulation (EU) 2021/2178 – performed also an assessment and identified activities, which could be possibly eligible or aligned with the specific nuclear and gas energy activities. In the case of MOL Group activities, relevancy was identified only for gas-related activities, due to the lack of a nuclear portfolio. For details, please see *Table 4*.

	Fossil gas related activities	TURNOVER		OPEX		CAPEX	
4,	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	**YES**	NO	**YES**	NO	**YES**	NO
5,	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES	**NO**	YES	**NO**	YES	**NO**
6,	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES	**NO**	YES	**NO**	YES	**NO**

Please note that taking into account that MOL Group does not have nuclear energy related activities, row 1-3 from above table have been excluded.

Table 4: Nuclear and fossil gas related activities

	Economic activities	TURNOVER		OPEX		CAPEX	
		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)	
		USDmn	%	USDmn	%	USDmn	%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	37.6	0%	10.1	6%	83.8	7%
8.	**Total applicable KPI**	25 130.5	**100%**	1 651.0	**100%**	2 080.8	**100%**

Please note that taking into account that MOL Group does not have nuclear energy related activities, row 1-3 from above table have been excluded.

Table 5: Taxonomy-aligned economic activities (denominator)

[31] Amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities ((EU 2022/1214)

	Economic activities	TURNOVER		OPEX		CAPEX	
		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)	
		USDmn	%	USDmn	%	USDmn	%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of applicable KPI	-	-	-	-	-	-
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	37.6	100%	10.1	100%	83.8	100%
8.	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	37.6	**100%**	10.1	**100%**	83.8	**100%**

Please note that taking into account that MOL Group does not have nuclear energy related activities, row 1-3 from above table have been excluded.

Table 6: Taxonomy-aligned economic activities (numerator)

	Economic activities	TURNOVER		OPEX		CAPEX	
		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)	
		USDmn	%	USDmn	%	USDmn	%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0%	0.0	0%	1.8	0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2 222.7	100%	377.3	100%	283.0	99%

8.	**Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI**	2 222.9	**100%**	377.3	**100%**	284.7	**100%**

Please note that taking into account that MOL Group does not have nuclear energy related activities, row 1-3 from above table have been excluded.

Table 7: Taxonomy-eligible but not taxonomy-aligned economic activities

In the case of the classification of non-eligible activities ("*taxonomy non-eligible fossil gas related activities*")[32] a full value chain approach has been applied. Figures reflect the following methodology, including elements: E&P gas related activities, gas midstream, gas trading and gas sales through the service station network. For details, please see *Table 8*.

	Economic activities	TURNOVER		OPEX		CAPEX	
		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)		Climate Change Mitigation (CCM)	
		USDmn	%	USDmn	%	USDmn	%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1561.4	6%	101.3	6%	47.4	2%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	21 228.3	84%	1 081.1	65%	1 596.6	77%
8.	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI'**	22 789.7	**91%**	1 182.4	**72%**	1 644.0	**79%**

Please note: (1)Taking into account that MOL Group does not have nuclear energy related activities, row 1-3 from above table have been excluded. (2) All gas value chain related non-eligible activities are allocated under point 4. in above table.

Table 8: Taxonomy non-eligible economic activities

[32] Article 2 (1) 7. (c) point of the Amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities ((EU 2022/1214)

POLLUTION

/E2/

IMPACTS AND RISKS RELATED TO POLLUTION

/E2. IRO-1/

ESRS	Disclosure Requirement related to ESRS 2 IRO-1
GRI	GRI 3, 3-3 b
IFRS	

MOL Group's 2024 double materiality assessment examined how pollution from the company's operations impacts environment and people (see: Chapter S3 of this report), as well as the financial implications of these effects on the company. The general methodology and consultation process are detailed in section ESRS 2 IRO-1 of this report, while specific procedures for identifying actual and potential pollution-related impacts and risks are outlined in Element 2: Risk & Change Management (please see details in Chapter ESRS 2 of this report) and in Appendix 7/A of the ***HSE MS***. This process involves site assessments and hazard mapping to evaluate emissions to air and soil and groundwater conditions, supported by site inventories and categorization. Hazard rankings based on pollution levels are conducted to prioritize environmental and technology-related risks and determine necessary mitigation actions. Insights from this process are integrated into the double materiality assessment through engagement with internal environmental protection experts, ensuring a comprehensive evaluation of pollution-related risks and impacts.

MOL Group has identified 3 pollution related impacts, 1 risk and no opportunities in the 2024 double materiality assessment. As a result, we concluded the topic Pollution to be material from impact perspective. From financial perspective, currently (on the short- and medium term) we consider pollution as non-material topic due to the low likelihood and low magnitude of the financial effect.

The list of impacts and risks which are described in the tables below:

Table IM-03: Effect on air quality

Severity	Moderate negative impact
Scope	Local (in potentially territorial)
Likelihood	Actual impact
Description	MOL Group's industrial operations and actors in its value chain emit gases which negatively affect the health of people and other living organisations, such as Sulphur Dioxide (SO2), Nitrogen Oxides (NOX), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Particulate Matters (PM) and pollutants specified by the E-PRTR regulation.
Mitigation actions & remendability	MOL Group is committed to monitoring and controlling emissions, as well as actively implementing emission reduction actions. This commitment involves tracking emission levels, analysing sources, and adopting measures designed to reduce the overall environmental impact. The company is dedicated towards improving air quality and to restoring and enhancing the surrounding environment to the fullest possible extent, but irremediable cases are possible.
Time horizons	We consider the matter material on all time horizons for all oil and gas assets.
Relevance in the value chain	Pollution is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical and in the Circular Economy Services business segments (currently under integration – therefore related disclosures are primarily qualitative).

Table IM-04: Spills

Severity	Moderate negative impact
Scope	Local (in potentially territorial)
Likelihood	Potential impact, medium likelihood
Description	MOL Group, as an oil, gas and petrochemical company is involved in the production, use, distribution and commercialisation of chemical substances. MOL Group puts great emphasis on operational safety when handling materials posing threat to the environment. However, malfunctions or accidents during operation might lead to spills or leaks of such materials to the environment adversely affecting the quality of water, soil and thereby living organisms.
Mitigation actions & remendability	MOL Group adheres to strict safety protocols and handling procedures, prioritizes education, performs maintenance actions, conducts regular controls, and takes remediation actions where necessary. These practices ensure a high standard of safety and operational efficiency. In the event of a spill, the company recognizes that effective remediation is essential. MOL Group's comprehensive response plans are designed to swiftly contain and clean up spills, minimizing environmental impact and restoring affected areas.
Time horizons	We consider the matter material on all time horizons for all oil and gas assets.

Relevance in the value chain	Pollution is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Logistics and in the Circular Economy Services business segments (currently under integration – therefore related disclosures are primarily qualitative).

Table RK-05: Risk of increased cost of environmental load reduction

Type	Operational and legal risk
Likelihood	Low
Magnitude of financial effect	Low
Description	MOL Group puts great emphasis on controlling the emission of pollutants. However, as a consequence of increasingly stringent environmental regulation (e.g., IED) and during unusual industrial activates (such as turnarounds, asset replacements, maintenance or accidents) the risk of increased environmental impact can lead to financial consequences to the company in the form of increased CAPEX, OPEX and potential compensations or liabilities.
Related impact & dependencies	Related environmental impacts relate to air quality (IM-03) and water discharges (IM-05). Impact on affected communities are detailed in IM-17.
Mitigation actions	See mitigation action in: Tables IM-03 & IM-04 above, and DR E2-2 below in this chapter.
Financial effect & time horizons	Identified financial effects include mitigation and remediation actions and expenditures on projects to ensure compliance with more stringent emission limits due to IED & related national implementations. As the aforementioned increase of the stringency environmental regulations are likely to only materialize after 2030, we only consider this risk financially material on the long-term.
Relevance in the value chain	Pollution is material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Logistics and in the Circular Economy Services business segments (currently under integration – therefore related disclosures are primarily qualitative).

The pollution related impacts and risks has strong interconnections with other environmental and social topics, such as water, waste, affected communities and biodiversity. Please see these described in the respective chapters:

- IM-05: Water discharges (Chapter E3)
- IM-06: Operations in areas in or near areas with high environmental value (Chapter E4)
- IM-08: Waste generation (Chapter E5)
- IM-17: Disturbance from operations (Chapter S3)

Description of how MOL Group manages its pollution related impacts and risks is described in the remainder of this chapter.

POLICIES RELATED TO POLLUTION

/E2-1/

MOL Group recognises the potential environmental impacts associated with its industrial operations, particularly in relation to pollution risks such contamination, air emissions and spills. To mitigate these risks and ensure the protection of air, soil and groundwater, the company has established comprehensive policies and practices that prioritise prevention, effective risk management, and long-term remediation. The following section outlines the MOL Group's relevant policies.

General policy commitments related to HSE are outlined in the ***Group HSE and Social Impact Policy*** and ***Health Safety and Environment Area Book***. For general information in these policy documents please refer to Chapter E1.

Pollution-specific process-based regulations addressing mitigating negative impacts related to pollution of air, water and soil are outlined in the Environmental Stewardship element of the HSE MS. General principles of MOL Group's Environmental Stewardship include:

- All the operated technologies are in compliance with the associated emission limits (BAT-AEL) and associated emission performance levels (BAT-AEPL) included in the relevant Best Available Technique conclusions, as transposed to individual permits (e.g. integrated permits), and the relevant best available technology standards where Best Available Techniques Reference Documents are not available.
- The best available techniques with the lowest emission level are considered during the design of new technology or purchase of new equipment, ensuring compliance with the strictest limits and performance levels.
- All operated sites undergo a regular check in order to identify the non-compliances, action plans are prepared and followed up.

Policies related effect on air quality (IM-03, RK-06) are described in the 'Air protection' section of HSE MS:

- Technology related pollutants are measured or calculated, and an action plan is prepared and implemented to reduce air emissions where it is relevant.
- Air emission data is regularly assessed and the results are used to support the maintenance and adjustment of equipment.

Policies related to reducing contamination and handling issues such as spills (IM-04) and financial risks due to environmental load (RK-06) are described in the 'Soil and groundwater' section of HSE MS:

- Desktop risk assessment is performed (and updated after relevant changes) for all operated sites, action plans/remediation programs – describing the necessary actions, foreseeable financial demands, responsibilities and a timeline – are prepared for high risk findings.
- The first priority is always prevention, with a risk based mechanical integrity program that includes regular checks and risk-based actions both on-site and off-site.
- Environmental performance must be considered when selecting remediation technologies.
- Long-term remediation programs are subject to regular independent reviews.
- Design limits are based on the requirements of the local regulations, where applicable; where local regulations or limits do not exist, the regulation refers to the limits to be kept.
- When selling assets, it is ensured that risks associated with soil and groundwater contamination are assessed and necessary risk mitigation measures are implemented.
- For acquisitions, a risk-based approach is adopted as part of the environmental due diligence process.

In its industrial processes, MOL Group handles substances of concern that may pose significant risks to human health and the environment. Recognizing these potential hazards, the company places a strong emphasis on the careful management of these substances and the prevention of associated risks. This report adopts an output-focused approach, providing details on the quantities of substances of concern that leave our facilities as products, components of products, or emissions, as well as outlining the policies and principles guiding their management. **Process-based regulations related substances of concern** are outlined in Element 8: Information & Documentation within the HSE MS:

- The company has established a robust process for documenting and managing hazardous materials in line with legal and HSE requirements. Information related to hazardous substances, including their identification, associated risks, and necessary controls, is systematically maintained, regularly reviewed, and kept up-to-date to ensure compliance and effective risk management. These documents are accessible in appropriate languages and supported by guidance or training to ensure proper implementation by all relevant stakeholders.
- Product stewardship local processes identify risks related to dangerous substances/products at an early stage and manage those risks along the value chain (i.e. development, authorization, registration and restrictions on their manufacture, market distribution, use, disposal or recycle), thereby enabling adequate protection of human health and the environment.
- New product assessments are locally conducted prior to introduction of product to market to identify and address HSE hazards and risk associated with their normal use and potential misuse.
- Periodic re-assessments are conducted if product specifications change, including the identification and review of adverse effects that are reported or experienced. All the information that the company possesses throughout manufacturing and distribution for all dangerous products is collected and kept updated.
- Local control processes are in place and operating to cover all aspects of the introduction of new products or substances into manufacturing or operational processes.
- Processes are in place and operational to ensure that operating conditions and risk management measures as defined in relevant Exposure Scenarios materials and substances are included in relevant risk assessments.
- Preparation and handling of Safety Data Sheets, packaging and labelling of products/goods is locally defined and controlled.
- Local processes are developed to include a REACH-relevant (REACH Regulation (EC) No 1907/2006) clause in contracts for all chemicals that are procured.

Disclosures related to avoiding, controlling and limiting (both environmental and health-related) impacts of incidents and emergency situations can be found in Chapter S1-B of this report (Process Safety & Management).

ACTIONS AND RESOURCES RELATED TO POLLUTION

/E2-2/

ESRS	Disclosure Requirement E2-2
GRI	GRI 3, 3-3

The section outlines the pollution-related actions, the key steps taken to meet policy objectives focusing on how they relate to managing the identified impacts and risks, and resources allocated to these efforts.

- To minimise emissions and maintain air quality (IM-03), MOL Group's regular actions include regulatory-compliant emission and air quality measurements such as discontinuous, continuous, and Leak Detection and Repair (LDAR) programs, as well as additional monitoring tailored to internal technological needs. Air-related studies and documentation to support compliance and the development of effective emission control strategies are regularly prepared. In 2024, the total cost of these regular processes were USD 1.6 million (with no significant change in costs compared to 2023 on similar matters).

- In 2024, MOL Group implemented regular soil and groundwater management measures (IM-04, RK-06), including remediation services such as intervention planning, licensing, monitoring, post-monitoring, soil excavation, replacement, and other related investment projects. Site remediation and monitoring activities were supported by laboratory analyses of monitoring samples to ensure effective oversight. The company also engaged experts for waste excavation supervision during emergency situations or soil replacement efforts. Additionally, geological and hydrogeological studies, surveys, and related documentation are conducted regularly to support soil and groundwater protection initiatives. Total cost of management actions accounted for USD 5.2 million, 26.8% more than in 2023 (USD 4.1 million).
- To ensure safety and compliance with REACH and other hazardous material and product safety regulations, MOL Group implemented actions with a total cost of USD 0.24 million, 26.9% lower compared to USD 0.33 million in the previous year. These included visual signs, product stewardship and regulatory documentation.

Besides the above listed regular operative measures, MOL Group has multiple projects under implementation which has relevancy with pollution prevention and other environmental objectives. Ensuring that our assets align with Best Available Technology (BAT) regulations is a key priority. BAT represents the most effective and advanced stage of development in industrial techniques, ensuring that facilities operate efficiently while meeting the highest environmental standards.

MOL Group is investing in advanced waste incineration facilities, significantly reducing the need for landfilling and related greenhouse gas emissions. One prominent project is in Százhalombatta, where a state-of-the-art mixed waste utilization facility is being developed with an annual capacity of 360,000 tons. The facility will feature a closed system to prevent odor, dust, and noise load of the environment, with waste unloaded directly into enclosed spaces. Equipped with five-stage flue gas cleaning technology, the facility will operate in compliance with the BAT associated emission levels. Additionally, inert slag from incineration will be reused based on proven international practices. The facility will also provide energy to replace a significant portion of the Dunai Refinery's natural gas and electricity consumption. With support from an experienced Danish partner, the facility is expected to be operational by mid-2028.

MOL Group is undertaking multiple projects to enhance wastewater treatment processes, including the implementation of scrubber equipment and caustic oxidation units. These investments, targeting the refinery at Százhalombatta and the petrochemical plant in Tiszaújváros, aim to reduce the burden on wastewater treatment plants and to further improve the quality of discharged water. By adopting advanced technologies, MOL Group minimizes its impact on local water bodies.

INA has been actively addressing historical pollution at the Urinj Peninsula, caused by decades of hydrocarbon accumulation in permeable karst subsoil. The major remediation activities started in 2023, and continued until November 2024 with approximately an EUR 4.5 million in these remediation budget. Drilling 21 new wells (including four outside the refinery perimeter) and 20 submersible pumps has been installed to enable more efficient hydrocarbon extraction from the subsoil, reducing the potential for pollutants to reach the sea. 220 meters of new, durable ocean dams were contracted to protect the sea from pollution during adverse weather conditions. Sewage systems, tanks and bund has been rehabilitated to prevent hydrocarbon leakage from refinery infrastructure.

In Slovakia, Slovnaft has intensified remediation at Klacany logistics depot to prevent aromatic contamination migration. Furthermore, Slovnaft obtained permanent operation permits for 12 new GWPS wells, and implemented innovative sludge management techniques at its waste water treatment facility.

In 2024, 40 incidents of spilling more than 1 bbl of hydrocarbon content have been registered on Group-level, with a total of 538 m^3 spilled to the environment. By far the biggest spill happened due to a leak on the 190 km long product pipeline between Százhalombatta and Pécs. The malfunction was found in the outskirts of Gárdony on October 16. A crack of barely 10 centimeters formed on the pipeline, which lies nearly two meters deep, through which up to 487 m^3 of diesel leaked into the soil at the site of the incident. The damaged section of the pipeline was immediately shut down, the leak was stopped within two days, and the faulty part was replaced. According to the investigations (still ongoing by the closure of this report), the contamination can be detected in an area of 50 meters and does not pose a threat to the fish pond or Lake Velence. After the closure of the investigation MOL will submit the intervention plan for review and approval to the relevant authority, and as always and will inform those affected.

TARGETS RELATED TO POLLUTION

/E2-3/

In line with the commitments and policy objectives laid down in the previous section, MOL Group has set 2 measurable, timebound targets in 2025 related to pollution mitigation:

- **Maintaining SOx Emissions at Baseline Levels by 2040:** MOL Group is committed to maintaining its SOx (sulfur oxides) emissions in 2040 at the same level as the average emissions recorded in 2021 and 2022. The baseline value for this target is determined as the mean of SOx emissions during these years, calculated at **4,026 tonnes** (2021: 3,409 tonnes; 2022: 4,643 tonnes).

- **Maintaining NOx Emissions at Baseline Levels by 2040:** MOL Group aims to keep its NOx (nitrogen oxides) emissions in 2040 consistent with the average emissions levels recorded in 2021 and 2022. The baseline for this target is the mean of emissions from these years, calculated at 5,433 tonnes (2021: 5,324 tonnes; 2022: 5,541 tonnes).

These voluntary targets reflects MOL Group's dedication to minimizing the environmental impact of its operations, particularly in areas prone to air quality challenges, by focusing on operational efficiency and maintaining stringent control over emission sources in all operated companies.

METRICS RELATED TO AIR, WATER AND SOIL POLLUTION

/E2-4/

ESRS	Disclosure Requirement E2-4
GRI	GRI 305, 305-7

This section details the pollutants emitted by MOL Group to air, water, and soil. It includes consolidated emissions from facilities under financial or operational control and provide details on measurement methodologies and data collection processes.

- During 2024, sulphur dioxide (SO_2) emissions significantly decreased by 20.8% compared to 2023 levels, dropping from 4,647 tonnes to 3,678 tonnes. This reduction was mainly driven by the Refining segment, where SO_2 emissions declined by 21.7%.
- Nitrogen oxides (NO_x) emissions slightly decreased by 0.8% to 5,370 tonnes in 2024 from 5,413 tonnes in 2023.
- Volatile Organic Compounds (VOC) emissions decreased by 3.7%, from 7,851 tonnes in 2023 to 7,560 tonnes in 2024.
- Carbon monoxide (CO) emissions, on the other hand, increased by 8.5% in 2024, reaching 1,114 tonnes compared to 1,026 tonnes in 2023. This increase was primarily driven by the Refining segment, where CO emissions rose by 22.4%.
- Particulate Matter (PM) emissions decreased significantly by 24.5% from 212 tonnes in 2023 to 160 tonnes in 2024.

Particulate Matter (PM) emissions decreased significantly by 24.5% from 212 tonnes in 2023 to 160 tonnes in 2024.

AIR EMISSIONS[33]	UNIT OF MEASURE	2024	2023	ESRS
Sulphur Dioxide (SO_2)	**tonnes**	3 678	**4 647**	E2-4_02
o/w Refining	tonnes	2 554	3 262	E2-4_02
o/w Petrochemicals	tonnes	44	40	E2-4_02
o/w Upstream	tonnes	28	29	E2-4_02
Nitrogen Oxides (NO_x)	**tonnes**	5 370	**5 413**	E2-4_02
o/w Refining	tonnes	2 204	2 237	E2-4_02
o/w Petrochemicals	tonnes	1 039	985	E2-4_02
o/w Upstream	tonnes	407	461	E2-4_02
Volatile Organic Compounds (VOC)	**tonnes**	7 560	**7 851**	E2-4_02
o/w Refining	tonnes	2 347	2 211	E2-4_02
o/w Petrochemicals	tonnes	128	178	E2-4_02
o/w Upstream	tonnes	3 146	3 600	E2-4_02
Carbon Monoxide (CO)	**tonnes**	1 114	**1 026**	E2-4_02
o/w Refining	tonnes	783	640	E2-4_02
o/w Petrochemicals	tonnes	54	138	E2-4_02
o/w Upstream	tonnes	224	202	E2-4_02
Particulate Matter (PM)	**tonnes**	160	**212**	E2-4_02
o/w Refining	tonnes	124	158	E2-4_02
o/w Petrochemicals	tonnes	15	11	E2-4_02
o/w Upstream	tonnes	2	2	E2-4_02
Hydro-fluorocarbons (HFCs)	**tonnes**	0	-	E2-4_02
Ammonia (NH_3)	**tonnes**	0	-	E2-4_02
PCDD + PCDF (dioxins + furans)	**tonnes**	0	-	E2-4_02
Nickel and compounds (Ni)	**tonnes**	0.4	-	E2-4_02
o/w Power and Heat Generation	tonnes	0.4	-	E2-4_02
Benzene	**tonnes**	17	-	E2-4_02
o/w Refining	tonnes	17	-	E2-4_02

WATER CONTAMINANTS	UNIT OF MEASURE	2024	2023	ESRS
Total Petroleum Hydrocarbons (TPH)	tonnes	19	20	E2-4_03

[33] The breakdown by business segments includes only the main segments, therefore their sum is not equal to the value in the summary row.

WATER CONTAMINANTS	UNIT OF MEASURE	2024	2023	ESRS
Chemical Oxygen Demand (COD)	tonnes	1 943	1 791	E2-4_03
Biological Oxygen Demand (BOD)	tonnes	329	281	E2-4_03
Suspended Solid (SS)	tonnes	821	766	E2-4_03
Chromium and Compounds (Cr)	tonnes	0.1	-	E2-4_03
Tetracloroethylene (PER)	tonnes	0	-	E2-4_03
Trichloroethylene	tonnes	0	-	E2-4_03
Trichloromethane	tonnes	0	-	E2-4_03
Total nitrogen	tonnes	1.2	-	E2-4_03
Anthracene	tonnes	0	-	E2-4_03
Benzene	tonnes	0	-	E2-4_03
Cadmium and compounds (Cd)	tonnes	0	-	E2-4_03
Copper and compounds (Cu)	tonnes	0.7	-	E2-4_03
Naphthalene	tonnes	0	-	E2-4_03
Phenols (as total C)	tonnes	2	-	E2-4_03
Lead and compounds (Pb)	tonnes	0.1	-	E2-4_03
Zinc and compounds (Zn)	tonnes	6.3	-	E2-4_03
Polycyclic aromatic hydrocarbons (PAHs)	tonnes	0	-	E2-4_03
Toluene	tonnes	0	-	E2-4_03
Phosphorus	tonnes	0.1	-	E2-4_03
Mercury and compounds (Hg)	tonnes	0	-	E2-4_03
Xylenes	tonnes	0	-	E2-4_03
Fluoranthene	tonnes	0	-	E2-4_03
Chlorides (as total Cl)	tonnes	0	-	E2-4_03
Nickel and compounds (as Ni)	tonnes	0.2	-	E2-4_03
Benzo(g,h,i)perylene	tonnes	0	-	E2-4_03

Air emission calculation methodology

MOL Group calculates air emissions based on its internal Reporting Handbook. The organization can use one of the following methods:

- **Direct Measurement**: Using periodic measurements or online analyzers.
- **Site-Specific Data**: Calculations based on data specific to the site.
- **Published Emission Factors**: Using established emission factors.
- **Estimation**: If default figures are unavailable, estimations can be used. The basis for these estimations must be indicated.

Water Emission Calculation Methodology

Water emissions must be reported based on regular laboratory analysis. The frequency of this analysis is usually specified in the environmental permit for each site. If not, the frequency should be based on the variability of the sources and the reproducibility of the test methods.

- Equivalent Test Methods: These can be used with appropriate conversions.
- Record Keeping: Maintain full records of all assumptions, calculation procedures, and test methods for inspection and audit purposes.
- Extrapolation: Use only when justified and no legal requirement for regular analysis exists.
- Detection Limits: If emission measurements are below the detection limit, record the emission as 0.
- Irrelevant Indicators: Sites where these indicators are irrelevant (e.g., office activities) and/or no defined obligation exist to measure pollutants (eg. in some service stations in Retail) will report a zero value.

Reporting Coverage

Relevant MOL Group Operating Companies must report the total quantity of air emissions from routine operations, emergencies, start-ups, and shutdowns, including fugitive emissions. This includes:

- Total Quantities: Emissions covered by environmental permits, international conventions, or national laws/regulations.
- Routine Process Emissions: Regular emissions from standard operations.
- Abnormal Process Emissions: Emissions from start-ups, upsets, well testing, extended well tests, etc.
- Maintenance Activities: Emissions from activities like tank purging.

- Emergencies/Accidental Releases: Emissions from incidents like loss of primary containment (LOPC), emergency flaring, equipment failure, etc.
- Combustion Emissions: Emissions from product transportation by company-owned shipping (tankers, boats, barges). Shipping by contracted haulers is excluded.
- Fugitive Emissions: Non-channelled emissions to air.

Inventory of Air Polluting Sources

Each MOL Group Operated Companies must identify and maintain an inventory of its specific air polluting sources, including:

- Stationary Sources: Boilers, fired heaters, waste incinerators, gas turbines, gas engines, diesel engines, and other emission sources.
- Diffuse Sources: Non-channelled emissions, including fugitive and non-fugitive emissions from shipping operations, process vents, storage tanks, loading/unloading of hydrocarbon liquids, flaring, cooling towers, and other non-combustion particulate sources.

Volatile Organic Compounds (VOC) includes a broader category of emissions, including benzene and toluene. While the reporting of specific pollutants is based on regulatory requirements related to point source emissions, VOC is a broader category which includes not only point source emissions, but fugitive emissions as well.

Water Emission Reporting

For internal reporting, MOL Group sites and business units will monitor and report the following water discharge data:

- TPH (Total Petroleum Hydrocarbon)
- COD (Chemical Oxygen Demand)
- BOD (Biological Oxygen Demand)
- TSS (Total Suspended Solids)
- All pollutants listed in the European Pollutant Release and Transfer Register (E-PRTR), established under Regulation (EC) No 166/2006

General Principles

- Reporting Unit: Chemical concentrations of water emissions are reported in tonnes (t).
- Reporting Requirements: Only units that discharge treated or untreated wastewater outside MOL Group boundaries (e.g., surface water, groundwater, public sewers, external wastewater treatment plants) must report.
- Laboratory Analysis: Figures must be based on regular laboratory analysis. If no environmental permit specifies the frequency, it should be based on the variability of sources and test method reproducibility. Equivalent test methods can be used with appropriate conversions.
- Record Keeping: Maintain full records of all assumptions, calculation procedures, and test methods for inspection and audit purposes.
- Detection Limits: If emission measurements are below the detection limit, record the emission as 0.
- Irrelevant Indicators: Sites where these indicators are irrelevant (e.g., office activities) will report a zero value.
- Mass Emission Estimation: Annual mass emissions are usually calculated based on periodic measurements of parameters or species concentration and flow rate.

INFORMATION ON SUBSTANCES OF CONCERN & SUBSTANCES OF VERY HIGH CONCERN

/E2-5/

MOL Group produces, transports, and commercializes a wide range of fossil fuels and refined oil and gas products, many of which have the potential to impact the environment and human health. Certain products fall within the categories of Substances of Concern (SOC) and Substances of Very High Concern (SVHC) as defined by the ESRS.

The potential risks associated with spills and accidental releases of these substances have been identified as material topics for MOL Group under Impact Metric IM-10 (Spills). To mitigate these risks, MOL Group implements stringent policies and risk management measures in accordance with REACH and other relevant local regulations, as detailed in Section E2-1 (Policies Related to Pollution). Despite these efforts, system integrity failures and accidental leaks may still pose hazards to the environment and human health.

The table below lists the key product groups containing SOC and SVHC, along with their respective hazard classifications. The quantities of procured, produced, and commercialized products are detailed in Chapter E5-4 (Resource Inflows) and E5-5 (Resource Outflows).

Product group	Hazard classes	Amount (2024)
Crude oils	• Carcinogenicity Category 1A • Chronic hazard to the aquatic environment category 2 • Germ Cell Mutagenicity Category 1B • Specific Target Organ Toxicity - Repeated Exposure Category 2 • Substances of very high concern	• Total Group production: 39,77 mboe/day • Refinery processing: 13 306 kt • Purchased and sold products: 4 615 kt
Naphtha products	• Carcinogenicity Category 2 • Reproductive Toxicity Category 2 • Specific Target Organ Toxicity - Single Exposure Category 2 • Hazardous to the Aquatic Environment - Chronic Category 1 • Substances of very high concern	• Refinery production: 391 kt • Sales: 348 kt
Motor gasolines	• Germ Cell Mutagenicity Category 1B Carcinogenicity Category 1B • Reproductive Toxicity Category 2 • Hazardous to the Aquatic Environment - Chronic Category 2 • Substances of very high concern	• Refinery production: 3 154 kt • Sales: 3 802 kt
Diesel and heating oils	• Carcinogenicity categories 1 and 2 • Specific Target Organ Toxicity - Repeated Exposure Category 2 • Hazardous to the Aquatic Environment - Chronic Category 2	• Refinery production: 6 702 kt • Sales: 11 505 kt
Kerosenes	• Hazardous to the Aquatic Environment - Chronic Category 2	• Refinery production: 537 kt • Sales: 713 kt
Fuel oils	• Reproductive Toxicity Category 2 • Germ Cell Mutagenicity Category 2 • Carcinogenicity Category 1B • Specific Target Organ Toxicity - Repeated Exposure Category 2 • Hazardous to the Aquatic Environment - Chronic Category 1 • Substances of very high concern	• Refinery production: 279 kt • Sales: 237 kt
Butadiene	• Germ Cell Mutagenicity Category 1B • Carcinogenicity Category 1A	• Petrochemical production: 74 kt • Sales: 76 kt
Raffinate	• Germ Cell Mutagenicity Category 1B • Carcinogenicity Category 1A • Specific Target Organ Toxicity - Single Exposure Category 3 • Hazardous to the Aquatic Environment - Chronic Category 2	• Petrochemical production: 114 kt • Sales: 0 kt

Please note only that the above table includes the material product groups which has SOC or SVHC content. Comprehensive list of all produced and commercialised material in 2024 cannot be provided on Group level as compliance with relevant regulations are managed locally at different companies within MOL Group's portfolio. Group level data collection process is under development.

WATER STEWARDSHIP

/E3/

IDENTIFIED WATER-RELATED IMPACTS

/E3. IRO-1/

ESRS	Disclosure Requirement 2 IRO-1
GRI	GRI 303-1-a;b GRI 303-1-c
IFRS	IFRS S1.55(b)(i)

MOL Group's double materiality assessment conducted in 2024 covered how the use of water and marine resources by the company affect people and the environment, and what is the financial effect of these impacts and the dependencies on water and marine resources for the company. The general methodology and consultation process are detailed in section *Impact, risk and opportunity management related to materiality assessment process* of this report, while specific procedures for identifying actual and potential water-related impacts and risks are outlined in Element 2: Risk & Change Management and in see *Section E3-1 - Policies: Water use* of this chapter.

MOL Group's 2024 double materiality assessment concluded that the company has a moderate impact on the environment due its water withdrawal, therefore, the topic is considered material from impact perspective. Since no significant risks or opportunities have been identified related to water or marine resources, we do not consider it material from financial perspective. Identified impact of MOL Group on the environment due to water discharges is described in the table below.

Table IM-05: Water discharges

Severity	Moderate negative impact
Scope	Territorial
Likelihood	Low
Description	For its industrial operations, MOL Group withdraws significant amount of water (ca. 100 million m3 in 2024). MOL Group constantly monitors and controls the content of water discharges to minimize the risk of potential adverse effects of any polluting materials ending up in the environment.
Mitigation actions & remendability	MOL Group prioritizes the monitoring and control of water discharge content to ensure environmental compliance and minimize the impact on water quality. This involves regular testing and management practices to maintain standards and prevent contamination. In terms of remendability, adverse effects from water discharges can often be addressed through effective restoration strategies, such as rehabilitating affected water bodies and enhancing filtration systems.
Time horizons	We consider the matter material on all time horizons for all oil and gas assets.
Relevance in the value chain	Impact of water discharge potentially material at the Upstream, Refining, Petrochemical, Logistics and in the Consumer Services business segments of the company.

The use of water resources has strong interconnections with other environmental and social topics, such as pollution, resource use, and biodiversity. Please see these described in the respective chapters:

- IM-05: Spills (Chapter E2)
- RK-05: Risk of increased cost of environmental load reduction (Chapter E2)
- IM-06: Operations in areas in or near areas with high environmental value (Chapter E4)

Description of how MOL Group manages its water related impacts is described in the reminder of this chapter.

POLICIES RELATED TO WATER USE

/E3-1/

ESRS	Disclosure Requirement E3-1
IFRS	IFRS S2.14(a)(i)

This section outlines the MOL Group's policies for managing the impacts related to water resources. It aims to provide a clear understanding of the company's approach to identifying, assessing, managing, and remediating these issues. General policy commitments related to HSE are outlined in the ***Group HSE and Social Impact Policy*** and ***Health Safety and Environment Area Book***.

Water management is a key part Mol Group's environmental stewardship commitments, with the purpose to reduce the negative environmental impact on the surface and subsurface water bodies. Relevant process-based regulations are outlined in the Environmental Stewardship element of the HSE MS:

- Risk-based quantity measurement is in place for water withdrawal and discharge. Over medium risk, what means 10% water withdrawal of MOL Group, measurements are highly recommended.
- Fresh water usage impact and economic assessment is prepared and risk based reduction plan is in place and implemented.
- Risk assessments are performed concerning water scarcity, particularly related to climate change impacts.
- Minimization of water consumption and freshwater intake is prioritized, especially in high and extremely high water-stressed areas.
- Efficient water usage practices are in place, including closed cooling circuits, tank cooling, and pressure tests. Grey water usage is preferred at owned office buildings and facilities.
- Quality standards are maintained for industrial waste water.
- Regular waste water quality data assessment is in place, feedback is provided to operators.
- Internal limits and operational discipline are maintained for wastewater treatment plants. It is ensured that waste water is not diluted. Implementation of best available techniques for wastewater treatment plants are ensured.
- Separated sewage system is established (contaminated/potentially contaminated and non-contaminated lines) in case of new and refurbished technologies.
- Water emergency drills are conducted. The frequency and the scenario has to be defined in local level regulations based on the main operational risks and business/site specifications.
- Water quality risks, are addressed through pollutant reduction plans.

ACTIONS RELATED WATER USE

/E3-2/

ESRS	Disclosure Requirement E3-2

IFRS	IFRS S2.14(a)(i)

The oil and gas industry consumes large amounts of water for the production facilities but it also produces large amounts of water due to the extraction of oil and gas. MOL Group is constantly focused on finding ways to improve the handling methods of these large quantities of water. These efforts include various regular measures to safeguard water resources, including projects aimed at reducing water intake and discharges, developing water pollution prevention plans, conducting surface water-related studies, water permitting, and monitoring and laboratory analyses of water and sewage releases as part of self-monitoring efforts. Emergency response initiatives are also established to protect surface water from pollution incidents. Allocated resources (annual HSE supervised operational expenses) to these actions were USD 5.9 million in 2024, 4.8% down from USD 6.2 million in 2023 (excluding soil and groundwater protection stated in the Actions: Pollution section).

On top of these regular activities, in 2024, MOL Petrochemical initiated a project to enhance the circularity of water by reusing purified wastewater from its Wastewater Treatment Units, which would otherwise be discharged into River Tisza. The project aims to optimise water use by utilizing existing pipelines and upgrading manual shut-off valves to motorized ones. This initiative brings multiple environmental and operational benefits: By recirculating wastewater, the project reduces the overall water extraction and minimizes the discharge load on the river. Additionally, significant energy savings can be achieved by optimizing pump operations, while the heat content of the purified wastewater can be utilized to reduce primary energy consumption, particularly natural gas, and chemical use. Another advantage is the automation of the firefighting system at MOL Petrochemical through the installation of motorized assemblies. While the current cost of natural surface water remains relatively low, future price increases are anticipated, making water reuse an economically sustainable solution. The project is financed through MOL Group's Green Fund, an internal financial mechanism designed to support investments with significant environmental benefits. The fund operates as an internal competition, prioritizing environmentally focused projects that have longer payback periods but remain economically viable.

Further information on actions related to water pollution mitigation and waste water treatment can be found in Section 'E2-2: Actions and resources related to pollution'.

TARGETS RELATED TO WATER

/E3-3/

ESRS	Disclosure Requirement E3-3
GRI	GRI 3-3 GRI 303-1-d GRI 303-1-d

In line with the commitments and policy objectives laid down in the previous section, MOL Group is targeting to achieve a 10% reduction in freshwater withdrawal by 2040 compared to the average withdrawal recorded in 2021 and 2022. The baseline for this target is the average of 76.4 million cubic meters. The target is voluntarily set and helps preserve water resources nearby MOL Group's operations, and prevent potential negative impacts on communities and water ecosystems.

METRICS RELATED TO WATER USE

/E3-4/

ESRS	Disclosure Requirement E3-4
GRI	GRI 3-3 GRI 303-5-a GRI 303-5-b GRI 303-5-c GRI 303-5-d GRI 303-3-a GRI 303-4-a

Total water withdrawal increased by 4.2% from 99.9 million m^3 to 104.1 million m^3 in 2024. A portion of this came from higher freshwater withdrawals, which grew by 3.5%, reaching 81.9 million m^3 in 2024 compared to 79.2 million m^3 in the previous year. Similarly, total water discharge also higher by 2.8%.

	UNIT OF MEASURE	2024	2023	ESRS
Water Consumption - Total	th m^3	21 544	20 167	E3-4_01
Upstream	th m^3	855	741	E3-4_09
- *o/w in regions with High or Extremely High Baseline Water Stress*	%	0	0	E3-4_02
Downstream Production (Refining and Petrochemicals)	th m^3	17 230	15 690	E3-4_09
- *o/w in regions with High or Extremely High Baseline Water Stress*	%	0	0	E3-4_02
Midstream	th m^3	3	-	E3-4_09
- *o/w in regions with High or Extremely High Baseline Water Stress*	%	0	-	E3-4_02
Other	th m^3	3 459	**3 737**	E3-4_09
- *o/w in regions with High or Extremely High Baseline Water Stress*	%	0	0	E3-4_02
Water Withdrawal - Total	th m^3	104 094	99 912	E3-4_11
Upstream	th m^3	4 494	4 358	
Refining	th m^3	76 475	70 664	
- *o/w Freshwater*	th m^3	57 432	53 044	
Petrochemicals	th m^3	13 459	15 173	
Other	th m^3	9 666	9 716	
Water Discharge - Total	th m3	115 634	112 478	E3-4_12
o/w water discharge after primary treatment	th m^3	59 306	55 466	
o/w water discharge after secondary treatment	th m^3	7 507	7 644	
o/w water discharge after tertiary treatment	th m^3	18 103	18 723	
o/w water discharge with no treatment	th m^3	28 219	25 984	
o/w water transferred to third parties for treatment	th m^3	2 506	1 840	

Measurement methodologies and assumptions regarding water Consumption, water withdrawal, and discharges are regulated in our Reporting Handbook as such:

Guidelines for Measuring and Reporting: The oil and gas industry handles substantial quantities of water from various sources. Of particular interest is the amount of fresh water utilized and ultimately consumed as a result of operations. This fresh water consumption metric is crucial for assessing resource efficiency. However, relying solely on fresh water intake volumes does not provide an accurate picture of actual water consumption, as some intake water passes through the facility without being depleted. Fresh water is consumed directly through evaporation and losses, been consumed by humans or incorporated into products. Evaporation and losses are estimated using the difference between intake and discharge volumes.

Fresh Water Consumption Calculation: Fresh water consumption is calculated by subtracting the amount of fresh water returned to a fresh water body from the total fresh water withdrawn by the MOL Group operated companies. Fresh water returned to fresh water bodies remains available to other users downstream, thus not removed from the regional water cycle.

Ensuring Accurate Consumption Calculations:

- Include water present in discharge streams in the total water withdrawal.
- Report only waters used for site purposes or produced waters in total withdrawal volumes, using measuring/metering or invoices.
- In the absence of measuring devices, volumes based on the best estimation (e.g. the pump's nominal capacity and operating hours)

Exclusions from Withdrawal Volumes:

- Water sold or used by third parties.

- Water processed by MOL Group Operated Companies for third parties.
- Fresh water taken over from another MOL reporting unit.

Inclusions in Withdrawal Volumes:

- Water from municipal supplies, utilities, tankers, and similar sources.
- Produced fresh water from refining operations, if not already included.
- Non-fresh water withdrawal, including seawater and water with total suspended solids greater than 1000 mg/L.
- Water used for once-through cooling systems and returned unchanged.
- Fresh water for household use.

Water Discharges:

- Wastewater removed by tankers is reported as discharge.
- Water processed or discharged by MOL Group Operated Companies for third parties is excluded from discharge reporting.
- Water transferred for treatment or reuse is included in the appropriate discharge field.
- Wastewater handed over to MOL Operated Companies' treatment plants is excluded from total fresh water discharge.
- Volumes are reported using measuring/metering or invoices, and based on the best estimation (eg. the pump's nominal capacity and operating hours

BIODIVERSITY

/E4/

IMPACTS, RISK AND OPPORTUNITIES RELATED TO BIODIVERSITY

/E4. IRO-1; E4. SBM-3/

ESRS	Disclosure Requirement related to ESRS 2 IRO-1; Disclosure Requirement E4.SBM-3
GRI	GRI 304-1-a-iv

The term biodiversity refers to the variability among living organisms from all sources and the ecological complexes of which they are part. However, it shall not be understood as a mere measure of variety, but as an indicator of the health of the environment. Loss of biodiversity due to human activity is a leading global concern. Based on the Kunming-Montreal Global biodiversity framework, the main direct drivers of biodiversity loss are changes in land and sea use, direct exploitation of organisms, climate change, pollution and the spread invasive alien species.

MOL Group acknowledges that its business model contributes to multiple of these drivers of environmental impact, primarily in the areas of climate change, pollution, and land use change. This chapter focuses on the latter—specifically outlining our policies, actions, targets, and indicators related to monitoring and mitigating the negative impacts of our operations on ecosystems due to land use changes. For disclosure on the other drivers please see Chapter E1 on Climate change, and Chapter E2 on Pollution.

MOL Group's double materiality assessment conducted in 2024 concluded that the company's upstream operations has material impact on the extent and condition of ecosystems– see details in Table IM-06 below. However, we have not identified risk and opportunities exceeding our financially materiality threshold stemming from this impact, or from any dependencies related to biodiversity and ecosystem. Description of the methodology is described in section ESRS 2 IRO-1 of this report. As a conclusion, topic biodiversity and ecosystem is considered material from impact perspective, but not from the financial perspective.

Table IM-06: Operations in areas in or near areas with high environmental value

Severity	Moderate negative impact
Scope	Local (i.e. at upstream operational sites)
Likelihood	Medium
Description	To obtain its main raw material, crude oil, MOL Group and its suppliers engage in exploration & production activities temporarily changing the land-use of certain areas, and potentially causing the disturbance of wildlife through light and noise pollution.
Mitigation actions & irremediability	MOL Group's approach includes preliminary screening, implementing mitigation measures to ensure minimal disturbance, and taking remediation actions when necessary. This helps to effectively manage potential impacts and address any issues that arise. MOL Group recognizes that while some impacts on

	high-value environmental areas can be remedied through effective restoration practices, others may be more challenging to reverse. The company is committed to restore any affected areas to their natural state whenever possible, guided by best practices and regulatory requirements.
Time horizons	We consider the matter material across all time horizons in case of oil exploration & production activities.
Relevance in the value chain	MOL Group's Upstream activities has material impact on the extent and condition of ecosystems. Relevant sites are described in section E4-5 of this chapter.

POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-2/

Establishment of new facilities, mainly related to exploration & production activities affect the land-use of certain areas, and potentially cause the disturbance of ecosystems. Element 7 of the **HSE MS** requires to regularly conduct biodiversity impact assessments and Action Plans (BAPs) for all sites in protected areas and next to water sources, and to minimise the biodiversity impacts of greenfield developments during the design.

MOL Group recognizes that while some impacts on high-value environmental areas can be remedied through effective restoration practices, others may be more challenging to reverse. However, the company is committed to restore any affected areas to their natural state whenever possible, guided by regulatory requirements and best practices as the Management and Remediation of Sites in the Petroleum Industry, issued by IPIECA. Appendix 2/A of the **HSE MS** provides detailed rules for the remediation and liability management of abandoned sites, with the primary goal of achieving an environment where manmade contaminants do not significantly impact human health and ecosystems. (IM-06). The document is applicable for owned, leased, or sold sites and facilities where the liability has been retained. In summary, the process description requires the following process:

Site assessment, hazard mapping and ranking: Entities are required to have site inventories which include owned and leased sites and to know the status of soil and groundwater for each site/location prior to the site assessment and hazard ranking process. For sites where information is not available about soil and groundwater status, or at sites with known contamination but without corrective action, a hazard ranking shall be performed. The output scores of the assessment should be weighted and sites categorized according hazard ranking levels.

Remediation action plan development: A remediation action planning involves identifying necessary actions for high/medium risk sites, revising the plan annually based on new information, and using baseline studies and statutory resolutions for production sites under the Industrial Emission Directive (IED). The remediation action plan shall include:

a) Actions to be implemented for each ranked site;
b) The required timeline for the remediation action plan is 12 years. Remediation actions shall be scheduled and actions must be identified at all high risk category sites. The businesses concerned are liable for tasks described in the relevant laws, regulations, and statutory resolutions.
c) Actions plans must include a prioritized, up-to-date register of remediation liabilities and their financial demands for the next 12 years to act as input for business planning and to be a source of reliable data for annual balance sheets and financial reports, as IAS37 and IFRS specifications. According to Accounting policy, major future liabilities such as environmental obligations shall be covered by provisions. Environmental obligations shall mean any and all such environmental tasks taken or to be taken in order to reach the performance of which is required by necessity of an external regulation (for example, the laws of the country concerned, compulsory EU regulations, or official decisions) or by the constructive obligation of the Company. Other refinements based on the details prescribed in laws and regulations; statutory resolutions, and business processes.

Project implementation: For the management of sites under remediation, the principles of Risk-Based Corrective Action must be applied. This risk-based approach recognises the diversity of oil & gas industry sites, and describes a three-tiered approach to decision-making in which site assessment, risk assessment and corrective action activities are appropriately tailored to site-specific conditions and hazards. After the identification of an unacceptable risk associated with a site, a number of risk management strategies may be considered. The works may vary from simple risk mitigation measures to large-scale site remediation. The following corrective measures might be used:

a) Traditional remediation techniques that can reduce the concentrations of contaminants;
b) Exposure pathway elimination methods, such as capping and hydraulic containment;
c) Land-use restrictions (administrative and institutional controls - these are especially important at larger facilities);
d) Monitoring of natural attenuation between sources and receptors (for the purpose of validating the decision to take no further action).

Aftercare activities: After implementing the corrective actions, a site monitoring system should be put in place, as part of the corrective action assurance process. Monitoring phase can include a wide range of activities, including quality and quantity control of the given medium; photo-monitoring and data based monitoring.

ACTIONS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-3/

Monitoring activities in both protected areas and areas of high biodiversity value outside protected areas are essential for mitigating risks and managing biodiversity impacts. Continuous monitoring is conducted for all HSE-relevant activities in line with the HSE MS (HSE MS) and locally applicable policies, which are adapted to specific business activities, regulatory requirements, and environmental conditions. Where applicable, Biodiversity Impact Assessments are carried out, and if a negative impact is identified, Biodiversity Action Plans are developed and implemented. These efforts are reported to the Group level annually. In 2024, five Biodiversity Impact Assessments and 49 Biodiversity Action Plans were prepared for Exploration and Production activities. In these cases, environmental protection measures have been implemented to mitigate impacts on air, water, and soil to minimise effect on the natural environment and on local communities, if any. Air emissions from point sources are monitored through accredited measurements every one and five years. The disposal of produced water has been conducted in compliance with water law operating permits, with key water components analysed and results evaluated according to regulatory requirements. Groundwater contamination has been monitored at main collection stations to enable early detection and mitigation. Soil contamination resulting from technical failures has been addressed immediately, with affected areas rehabilitated as soon as possible. The technological system operates under pressure with continuous on-site supervision, while corrosion protection measures prevent underground pipeline perforation.

MOL Group operates across more than 200 companies and 2,000 sites, making it unfeasible to consolidate biodiversity actions or financial resource allocations at the Group level. Biodiversity measures are managed locally, tailored to regulatory requirements and environmental conditions, and integrated into decentralized environmental management systems. Consequently, defining "key actions" with a uniform scope, time horizon, or financial breakdown is not possible.

There is no standardized methodology to quantify or allocated financial resources for biodiversity-related actions across the Group. While impact assessments and action plans are conducted as required, these are managed at the entity or site level. As a result, MOL Group reports on biodiversity efforts at an aggregate level but does not provide a consolidated financial breakdown. For further financial information, please refer to the EU Taxonomy report, while noting that it does not fully reflect the actual efforts and allocated resources. For specific actions related to the protection and preservation of nature, please see case studies published on our website.

TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-4/

MOL Group has currently not adopted any targets on measurable biodiversity indicators. However, with MOL Group thrives to minimise its impacts on biodiversity and the ecosystem with stringent processes, and with targets related to the drivers of the biodiversity and ecosystem degradation – such as climate change, pollution and water-use. Please refer to the Targets section in other Environmental standards for further information.

METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-5/

Table: Sites in or near protected areas:

Business unit	Number of sites	Area of sites (km²)	ESRS
Upstream	55	204,8	E4-5_01; E4-5_02
Downstream	4	16,6	E4-5_01; E4-5_02
Retail & Logistics[34]	188	1,6	E4-5_01; E4-5_02
Total	247	223	E4-5_01; E4-5_02

Upstream activities has the biggest area covered in protected and biodiversity rich areas, and based on our materiality assessment, exploration and production activities are negatively effecting biodiversity due to temporal land-use change. Given the scale of these activities, it is important for the company to carefully consider potential impacts on biodiversity and integrate environmental factors into decision-making processes. In 2024, the following protected areas were affected by the upstream activities of MOL Group:

Hungary	• Hortobágy National Park • Körös-Maros National Park • Őrség National Park • Balaton Uplands National Park • Duna-Dráva National Park • Kiskunság National Park • Bükk National Park

[34] Excluded 108 Retail & Logistics sites (0,9km²) of MOL Polska, which are currently not under the scope of MOL Group's HSE MS due to the integration period.

Croatia	• Regional Park Mura-Drava • Special Reserve Đurđevački Pesci and Crni Jarki • Nature Park Lonjsko Polje • Žutica Forest
Pakistan	• Kohat Darwazai Banda Game Reserve • Kohat Marchungi Game Reserve • Kohat Dhoda Paya Game Reserve

Definitions (MOL Group Reporting Handbook):

- **Site:** Operational sites, including wells, and other gathering stations and establishments that are above the surface; active/open and operated by MOL Group in the reporting period. Standalone pipelines, roads, and third-party areas are excluded.
- **Impact:** The effect an organization has on the economy, the environment, and/or society, indicating its contribution (positive or negative) to sustainable development.
- **Critical/Significant Impact on Biodiversity**: An impact that can adversely affect the integrity of a geographic area or region, either directly or indirectly, by substantially changing its ecological features, structures, and functions across its whole area, and over the long term, so that habitat, its population levels, and the particular species that make the habitat important cannot be sustained.
- **Protected Area:** A geographic area designated, regulated, or managed to achieve specific conservation objectives.

RESOURCE USE AND CIRCULAR ECONOMY

/E5/

In our 2024 double materiality assessment, we identified the following impacts, risks, and opportunities related to resource use and circular economy:

- Providing waste management & circular economy services (IM-07)
- Waste generation (IM-08)
- Risks due to waste handling & recycling capacity bottlenecks (RK-06)
- Risks of shortage of services, feedstock, products to be obtained from market (RK-08)
- Waste management services (OP-02)
- Sustainable chemicals (OP-03)
- Waste-based fuel usage and production (OP-08)
- Sustainable aviation fuel (OP-10)
- Biogas production (OP-11)

As a result, we concluded the topic Resource use and circular economy to be material from both impact and financial perspective. Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report, whilst additional information is available in topical IRO-1 section in the beginning of each sub-chapter.

The aim of this chapter is to describe how MOL Group manages the listed IROs, focusing on material usage across various value chains, waste generation and treatment, and the adoption of circular economy practices. Resource use influences broader environmental issues like climate change, pollution, water resources, and biodiversity. Management of IROs related to these issues are addressed in previous chapters of this report.

MOL Group is involved in various different value chains (see ESRS 2 SBM-1 for details) which use different resources and need different approaches to manage IROs. Therefore, this chapter is divided into three sub-chapters which cover distinct aspects of managing the resource flows in MOL Group and its value chains:

- **Sub-chapter A** addresses own waste generation and treatment within MOL Group. It covers waste from all business segments, emphasizing the environmental, health, and safety aspects of waste management.
- **Sub-chapter B** highlights managing the risks and opportunities of MOL Group's downstream activities (including oil refining, petrochemical production, and gas transportation), which have both the highest exposure to resource-use risks and the greatest potential for circularity opportunities.
- **Sub-chapter C** focuses on managing the impacts, risks, and opportunities within MOL Group's circular economy services segment, which operates under the state waste management concession in Hungary.

Each sub-chapter starts by providing a detailed description of IROs relevant for the topic, then details of the policies, action, targets and metrics on outlining how these IROs are managed by MOL Group.

SUB-CHAPTER A: MANAGEMENT OF IMPACTS AND RISKS RELATED TO OWN WASTE GENERATION AND TREATMENT

IDENTIFIED IMPACTS AND RISKS RELATED TO OWN WASTE GENERATION AND TREATMENT

/E5. IRO-1; E5. SBM-3/

ESRS	Disclosure Requirements related to E5.IRO-1, SBM-3
GRI	GRI 3, 3-3;
IFRS	IFRS S1 B1

MOL Group's 2024 double materiality assessment included assessing impacts, risks and opportunities related to own waste – following a similar methodology as in other environment related issues. Please refer to *Chapter E2.IRO-1: Impacts and risks related to pollution* for detailed information. **Identified impacts and risks are outlined in Table IM-08 and Table RK-06 below:**

Table IM-08: Waste generation

Severity	Potential negative impact
Scope	Local
Likelihood	Medium
Description	Via its own operations, activities of its sub-contractors and suppliers and through the disposal of its sold products MOL Group directly and indirectly contributes to the generation of waste, including hazardous materials & chemical substances. Waste can adversely affect the environment nearby disposal / landfilling sites. Besides putting great emphasis on the safe and environmentally friendly disposal of waste at all of its sites and increasing recycling rates, MOL Group is dedicated to contributing to EU's target of reducing the landfilling of waste below 10% by 2035 as a concession commitment through its subsidiary, MOHU Ltd. in Hungary.
Mitigation actions & irremediability	MOL Group follows strict safety protocols and handling procedures, emphasizes education, conducts maintenance actions, performs regular controls, and takes remediation actions where necessary to ensure environmental recovery.
Time horizons	We consider the issue material on all time horizons, and dedicated to the transition towards a cirular economy.
Relevance in the value chain	Waste generation in material in all of MOL Group's business activities and value chains, therefore the issue has a Group-level overview.

Table RK-06: Risks due to waste handling & recycling capacity bottlenecks

Type	Operational risk
Likelihood	Medium
Magnitude of financial effect	High
Description	Significant amount of waste is produced during O&G activities, which poses the liability for safe disposal on the company. MOL Group has well-developed polices to ensure the safe disposal of waste, however, increasingly stringent regulation and EU-level recycling and landfilling targets requires significant investments from the company.
Related impact & dependencies	Associated impact related to the generation of waste – mainly during heavy industrial activities (IM-08) and in the form of waste management services in Hungary under the circular economy services segment (IM-07).
Mitigation actions	Mitigation of risks related to negative impacts on people and the environment include safety protocols and handling procedures, education, maintenance actions, regular controls and remediation actions where necessary – see DR E2-1, DR E2-2, E5-1 and DR E5-2.
Financial effect & time horizons	Financial effect stem from both the handling of waste generated by MOL Group and waste handled by CES. The estimation on the magnitude of financial effect includes the associated CAPEX to ensure regulatory compliance and reduce environmental impact; and OPEX to ensure safe waste disposal (see DR E5-2 and DR E5-6), It excludes revenues associated with providing waste management services – see OP-02 for relevant information. Since circular economy is a key part of Mol Group's business strategy, the topic is considered crucial from financial materiality perspective on all time horizons.
Relevance in the value chain	The risk is material for all oil & gas value chains and waste management activities.

Further impacts, risks and opportunities related to resource use and circular economy are outlines in Chapter E5-B (related to oil & gas-related activities) and in Chapter E5-C (related to waste management related activities).

POLICIES RELATED TO WASTE GENERATION AND TREATMENT

/E5-1/

ESRS	Disclosure Requirement E5-1
GRI	GRI 3, 3-3 GRI 2, 2-23 & 2-24
IFRS	IFRS S2.22 (b) (ii)

This section outlines the MOL Group's policies for handling waste generated during own activities (policies, actions and other disclosures on the waste management services provided by MOL Group are described in Chapter E5-C of this report). General policy commitments related to HSE are outlined in the ***Group HSE and Social Impact Policy*** and ***Health Safety and Environment Area Book*** (please refer to Chapter: E1 of this report for more information).

Waste handling is a key element in MOL Group's environmental stewardship commitments, with the purpose to reduce the negative environmental impact and mitigating risk associated with generated waste. Relevant process-based regulations are outlined in the **Environmental Stewardship element of the *HSE MS***:

- Waste minimization strategies are followed in line with the 5R principles (refuse, reduce, reuse, repurpose and finally, recycle) to lessen the amount of waste that will end up in landfill and to optimise recycling programs.
- When selecting waste treatment technology, its environmental performance is considered based on the waste pyramid.
- Waste collection is conducted without environmental pollution, and selectively, EU-level guidelines (Commission Decision 2000/532/EC).
- Project planning includes the establishment of a waste minimization plan and waste storage facilities, waste collection and treatment solutions.
- Efforts are made to minimize environmental disturbances at existing landfills.
- Waste transportation protocols are in place based on legal requirements.
- It is ensured that waste is not diluted.
- Priority is given use existing own facilities or establishing facilities based on a thorough cost-benefit analysis and business case for transport and treatment of the waste.

ACTIONS RELATED TO WASTE GENERATION AND TREATMENT

/E5-2/

MOL Group regularly carries out extensive waste management measures, including the excavation, loading, transportation, and treatment of hazardous and non-hazardous waste. These efforts were supported by related studies, documentation, and laboratory analyses, including re-qualification of waste to ensure compliance and proper handling. Operational fees for waste yards, managed by external operators, were incurred to facilitate efficient waste processing and disposal. In total, cost of these general operative actions in 2024 were USD 15.5 million, 10.2% more compared to USD 14.1 million in 2023.

Besides the above listed regular operative measures, MOL Group regularly implementing projects to ensure safe handling of waste and compliance with Best Available Technology (BAT) requirements. Prominent examples are ongoing investments in advanced waste incineration facilities and increasing recycling capacities. Please find information on relevant actions in Section E2 – Pollution, and Sub-chapter E5-B.

TARGETS RELATED TO WASTE GENERATION AND TREATMENT

/E5-3/

ESRS	Disclosure Requirement E5-3
GRI	GRI 3, 3-3

MOL Group is committed to achieve EU-level targets related to waste handling – see more details in Chapter E5-C on MOL Group's waste management services. Regarding handling of own waste, MOL Group's approach is ensuring following all BAT requirements, and do not plan to implement other public targets related to handling own waste in the near future.

METRICS RELATED TO WASTE GENERATION AND TREATMENT

/E5-3/

ESRS	Disclosure Requirement E5-3
GRI	GRI 306-2 GRI 306-3 GRI 306-4 GRI 306-5

The total waste generated on MOL Group-level increased by 0,6%, primarily due to higher waste generation from well drilling and maintenance activities. Overall, 65% of the total waste generated was diverted from disposal through recovery operations. Hazardous waste diverted from disposal through recovery operations increased significantly by 22.1%, reaching 33.4 thousand tonnes in 2024. Non-hazardous waste diverted from disposal saw an even more substantial rise of 44.4%, increasing from 56.1 thousand tonnes in 2023 to 81.0 thousand tonnes in 2024. Conversely, hazardous waste directed to disposal decreased by 28.7%, from 60.1 thousand tonnes to 42.8 thousand tonnes. Non-hazardous waste directed to disposal also declined by 23.0%, totalling 35.7 thousand tonnes in 2024 compared to 46.4 thousand tonnes in 2023. Waste streams are listed in the below tables based on their EWC (European Waste Codes) classification.

WASTE	UNIT OF MEASURE	2024	2023	ESRS
Total waste generated	tonnes	176 779	**175 744**	E5-5_07
Non-recycled waste	tonnes	78 511	**106 452**	E5-5_10
Percentage of non-recycled waste	%	44	**61**	E5-5_10
Total hazardous waste	tonnes	76 258	**87 468**	E5-5_15
Total waste diverted from disposal by recovery operation	tonnes	114 458	**83 487**	E5-5_08
Hazardous waste	tonnes	33 446	**27 394**	E5-5_08
Preparation for reuse	tonnes	9 201	1 790	E5-5_08
Recycling	tonnes	22 471	24 704	E5-5_08
Other recovery options	tonnes	1 775	900	E5-5_08
Non-hazardous waste	tonnes	81 012	**56 093**	E5-5_08
Preparation for reuse	tonnes	17 181	9 356	E5-5_08
Recycling	tonnes	59 411	43 135	E5-5_08
Other recovery options	tonnes	4 419	3 602	E5-5_08

WASTE	UNIT OF MEASURE	2024	2023	ESRS
Total waste directed to disposal by disposal operation	tonnes	78 511	**106 452**	E5-5_09
Hazardous waste	tonnes	42 812	**60 074**	E5-5_09
Incineration (with energy recovery)	tonnes	7 070	14 460	E5-5_09
Incineration (without energy recovery)	tonnes	3 921	20 088	E5-5_09
Landfilling	tonnes	2 696	2 566	E5-5_09
Other disposal operations	tonnes	29 124	22 960	E5-5_09
Non-hazardous waste	tonnes	35 700	**46 378**	E5-5_09
Incineration (with energy recovery)	tonnes	3 497	4 620	E5-5_09
Incineration (without energy recovery)	tonnes	30	28	E5-5_09
Landfilling	tonnes	23 095	33 199	E5-5_09
Other disposal operations	tonnes	9 078	8 531	E5-5_09

WASTE BY COMPOSITION	UNIT OF MEASURE	2024	2023	ESRS
Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals (EWC 01)	tonnes	16 698	21 080	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	9 649	16 105	
Waste directed to disposal	tonnes	11 120	3 527	
Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing (EWC 02)	tonnes	67	28	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	20	0	
Waste directed to disposal	tonnes	47	28	
Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard (EWC 03)	tonnes	0	0	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	0	0	
Waste directed to disposal	tonnes	0	0	
Wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal (EWC 05)	tonnes	8 434	16 505	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	1 232	4 255	
Waste directed to disposal	tonnes	7 469	12 098	
Wastes from inorganic chemical processes (EWC 06)	tonnes	207	29	E5-5_12

WASTE BY COMPOSITION	UNIT OF MEASURE	2024	2023	ESRS
Waste diverted from disposal / waste prevented	tonnes	125	10	
Waste directed to disposal	tonnes	82	19	
Wastes from organic chemical processes (EWC 07)	tonnes	552	5 425	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	0	4 926	
Waste directed to disposal	tonnes	549	492	
Wastes from the manufacture, formulation, supply and use (mfsu) of coatings (paints, varnishes and vitreous enamels), adhesives, sealants and printing inks (EWC 08)	tonnes	68	15	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	2	21	
Waste directed to disposal	tonnes	66	50	
Wastes from the photographic industry (EWC 09)	tonnes	1	1	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	0	0	
Waste directed to disposal	tonnes	1	1	
Wastes from thermal processes (EWC 10)	tonnes	201	295	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	1	4	
Waste directed to disposal	tonnes	200	293	
Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydrometallurgy (EWC 11)	tonnes	21	59	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	0	0	
Waste directed to disposal	tonnes	21	59	
Wastes from shaping and physical and mechanical surface treatment of metals and plastics (EWC 12)	tonnes	315	149	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	156	76	
Waste directed to disposal	tonnes	159	73	
Oil wastes and wastes of liquid fuels (except edible oils, and those in chapters 05, 12 and 19) (EWC 13)	tonnes	18 110	19 292	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	7 847	6 059	
Waste directed to disposal	tonnes	10 195	28 492	
Waste organic solvents, refrigerants and propellants (except 07 and 08) (EWC 14)	tonnes	154	137	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	6	4	
Waste directed to disposal	tonnes	148	133	
Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified (EWC 15)	tonnes	4 439	3 251	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	3 112	2 452	
Waste directed to disposal	tonnes	1 334	1 342	
Wastes not otherwise specified in the list (EWC 16)	tonnes	9 197	11 101	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	15 577	8 257	
Waste directed to disposal	tonnes	4 186	2 830	
Construction and demolition wastes (including excavated soil from contaminated sites) (EWC 17)	tonnes	74 847	44 335	E5-5_12

WASTE BY COMPOSITION	UNIT OF MEASURE	2024	2023	ESRS
Waste diverted from disposal / waste prevented	tonnes	65 299	31 344	
Waste directed to disposal	tonnes	10 884	10 974	
Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care) (EWC 18)	tonnes	0	0	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	0	0	
Waste directed to disposal	tonnes	0	0	
Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use (EWC 19)	tonnes	9 106	12 484	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	3 037	1 921	
Waste directed to disposal	tonnes	6 061	12 162	
Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions (EWC 20)	tonnes	34 363	41 558	E5-5_12
Waste diverted from disposal / waste prevented	tonnes	8 463	8 051	
Waste directed to disposal	tonnes	25 921	33 878	

Categories for Waste Management Reporting:

- Waste generation
- Waste diverted from disposal
- Waste disposal
- Recollected waste
- Cross border hazardous waste exported and/or imported

Methods of Measurement and Estimation:

- **Direct Measurement On-Site**: Measuring the mass of waste directly on-site using a calibrated weighing device.
- **Contractor Measurement**: Direct measurement by a waste management contractor.
- **Periodic Measurement**: Periodically measuring the mass of waste to facilitate estimations based on volume. This process covers a wide range of waste types over a representative period. Since waste mass can vary significantly, estimation factors are regularly verified, and records are kept to maintain accuracy and traceability.
- **Estimation When Exact Data is Unavailable**: If exact weight data isn't available, estimating the weight using available information on waste density and volume collected, mass balances, or similar information. The current waste density is determined and recorded regularly (e.g., monthly or quarterly). Measurement intervals are adjusted based on expected variations in waste density to balance accuracy and efficiency. If high density variations (over 10%) are noticed, measurement intervals are shortened. Conversely, if measurements are very similar, intervals are increased. Additionally, density measurement is reassessed each time there is a suspicion that the waste composition has changed or if there are visible indications of such change. This continuous process helps improve the overall accuracy of volume/weight measurement.

Classification of Reported Quantities:

- Hazardous Waste
- Non-Hazardous Waste

General Reporting Principles:

- Report all quantities as the gross weight of the waste in metric tonnes. Convert volume to metric tonnes if only volume data is available.
- Include all waste generated by MOL Group operations, whether recovered or disposed of by MOL Group or third parties (including office waste where possible).
- Use waste registries for local authority reporting as the primary data source.
- Additional data sources include external waste audits, waste balance sheets from disposal service providers, internal billing, accounting systems, and the procurement department.
- Report waste generated by contractors on MOL Group premises unless other contractual arrangements exist.

- Report waste as it is generated by MOL Group entities and handed over to contractors. For example, if hazardous waste is generated on MOL premises but later transformed into non-hazardous waste by a contractor, report it as hazardous.
- Report quantities of pre-treated waste after pre-treatment.
- Do not report wastewater discharged to water treatment plants as waste; follow the Recommended Practice Water Reporting. Do not report aqueous waste/wastewater stored in tanks prior to treatment as waste.
- Split reported quantities based on categories defined in section 2.2 (hazardous and non-hazardous, arising from operations, special measures, regular remediation activities, construction/demolition, recollection, and waste from E&P drilling, well completion, and workover activities).
- Exclude remediation drilling and associated waste from hazardous waste arising from drilling activities, well completion, and workover activities.
- To provide information about the composition of waste, use the European Waste Catalogue as the basis for the reporting structure. All waste-related data is reported under the main group codes of the catalogue.

SUB-CHAPTER B: CIRCULAR ECONOMY & RESOURCE USE IN THE DOWNSTREAM SEGMENT

IDENTIFIED RISKS AND OPPORTUNITIES RELATED TO CIRCULAR ECONOMY & RESOURCE USE IN THE DOWNSTREAM SEGMENT

/E5. IRO-1/

MOL Group's Downstream operations, including oil refining and petrochemical production, present substantial resource-use risks along with significant opportunities for circular economy initiatives. During our 2024 double materiality assessment, we identified 1 risk and 4 opportunity related to the resource use in our Downstream segment, making the topic *E5: Circular Economy & Resource use* financially material. Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report.

This section outlines MOL Group's approach on managing these risks and opportunities listed below, emphasizing how MOL Group can leverage circular economy strategies to address resource-related risks while maximizing potential for sustainable growth.

Table RK-08: Risks of shortage of services, feedstock, products to be obtained from market

Type	Operational risk
Likelihood	Low
Magnitude of financial effect	High
Description	Albeit MOL Group operates in an integrated model, where all major elements of the oil & gas value chain are within its operating boundaries (from oil exploration to retails sales); the company is dependent on a large supply chain, from many different industries and geographies to obtain its input materials (raw materials for feedstock, input products) and a wide range of services for its operations. Major disturbances in the value chain due changes in the macro environment, emerging regulations, social problems, armed conflicts or other external factors can have significant potential impact on its business.
Related impact & dependencies	Since MOL Group is a major company and fuel supplier in the CEE region, it has a significant impact to on the regional supply chains - see IM-09 and IM-15.
Mitigation actions	MOL Group has an elaborated the crude diversification strategy; alternative crude slate was defined, relevant capex projects defined and started. Supply chain risks are mitigated by stock, supply chain and supplier management actions.
Financial effect & time horizons	Due to the significant spending on inputs materials & services (7,360,586 million HUF on Raw materials and consumable goods) in 2024, we consider this risk financially material on all time horizons.
Relevance in the value chain	Risks of shortage of services, feedstock, products to be obtained from market is a material risk across all levels of MOL Group's value chain.

Table OP-03: Sustainable chemicals

Maturity at MOL Group	Pilot
Magnitude of financial effect	High
Description	A key element if MOL Group's business strategy is the diversification from fossil fuels and skewing downstream production towards petrochemicals. Chemicals have a lower product carbon footprint and can be made from recycled materials or be recycled themselves.
Related impact, risks & dependencies	The opportunity is an important enabler of reducing the dependency of the company's business model on the fossil fuel demand. Furthermore, it helps MOL Group to reduce its GHG emissions on the long term (IM-02) and contributes to a low carbon, circular economy (IM-01, IM-07, IM-19), and mitigate and associated risks (RK-01, RK-02, RK-05, RK-06).

Financial effect & time horizons	MOL Group has key investment on track related to petrochemicals, including a Polyol and metathesis facility at Tiszaújváros and an increased polypropylene production at the Bratislava refinery. Focus of further development will shift from large-scale projects to medium size investments until 2030. The cost of current and planned investments and associated EBIDTA makes the topic material to a „high" degree on all time horizons.
Relevance in the value chain	Sustainable chemicals are a material opportunity in the Petrochemicals and Circular Economy Services segment of MOL Group.

Table OP-08: Waste-based fuel usage and production

Maturity at MOL Group	Assessed/planned
Magnitude of financial effect	Medium
Description	Utilizing waste as a feedstock for fuel production can help reduce reliance on conventional resources and lower carbon emissions. MOL Group is already involved in the production, co-processing and/or sales of several types of biofuel and has further plans for co-production of diesel with waste materials, UCOME production and recycled carbon fuels.
Related impact, risks & dependencies	By pursuing this opportunity, MOL Group reduces its impact of climate change (IM-02) and contributes to a low carbon, circular economy (IM-01, IM-07, IM-19), and reduces its dependency on raw materials (mainly crude oil) and associated risks (RK-01, RK-02, RK-05, RK-06).
Financial effect & time horizons	Related investments and EBIDTA makes the financial effect of this opportunity „medium". It is considered financially material in all time horizons, but mainly on the long term due to its increasing significance.
Relevance in the value chain	Waste-based fuel usage and production is a material opportunity in the Refining, NSB and Circular Economy Services segment of MOL Group.

Table OP-10: Sustainable aviation fuel

Maturity at MOL Group	Assessed/planned, pilot
Magnitude of financial effect	High
Description	Developing and marketing sustainable aviation fuels (SAF) derived from renewable sources can help reduce the carbon footprint of the aviation industry, where oil and gas companies can play a significant role in the transition to greener alternatives.
Related impact, risks & dependencies	By pursuing this opportunity, MOL Group reduces its impact of climate change (IM-02) and contributes to a low carbon, circular economy (IM-01, IM-07, IM-19), and reduces its dependency on raw materials (mainly crude oil) and associated risks, especially renewable fuel related regulatory compliance (RK-01, RK-02, RK-05, RK-06).
Financial effect & time horizons	MOL Group is already actively marketing of SAF products (short term), whilst own production projects are considered on the medium term. Therefore, the opportunity is considered material on all time horizons.
Relevance in the value chain	Sustainable aviation fuel is a material opportunity in the Refining and NSB segment of MOL Group.

Table OP-11: Biogas production

Maturity at MOL Group	Assessed/planned, Implemented at scale
Magnitude of financial effect	Medium
Description	Biogas – and its most advanced form, biomethane, as a greener alternative to natural gas - is steadily gaining ground as an energy source due to its contribution to the energy transition and decarbonization. MOL Group has a biogas facility[2] at Szarvas, and is also planning to invest in biomethane[1] production capacities as part of its Shape Tomorrow strategy.
Related impact, risks & dependencies	Biomethane is a key enabler to reduce CO2 emissions and regulatory compliance regarding renewable energy use (RED III). Therefore, it contributes to a low carbon, circular economy (IM-01, IM-07, IM-19), and reduces its dependency on raw materials (mainly crude oil) and associated risks (RK-01, RK-02, RK-05, RK-06).
Financial effect & time horizons	Due to the planned ramp-up of waste-based gas production, the opportunity is considered financially material on the medium-term.
Relevance in the value chain	Biogas production is a material opportunity in the NSB part of MOL Group's value chain.

POLICIES RELATED TO RESOURCE USE

/E5-1/

Our commitment to sustainable resource use guides our approach to managing risks and leveraging opportunities within our Downstream segment. The policies described in this chapter are designed to address key risks, including the potential impact of disruptions (such as regulatory changes, social challenges, or geopolitical factors) within our diverse supply chain, spanning multiple industries and geographies.

In response, MOL Group's ***Shape Tomorrow Strategy*** is centered on becoming a sustainable company providing materials for the economy and energy for mobility. Alongside reducing the carbon footprint of our product portfolio, we will enhance the sustainability of industrial activities, and integrate circular economy technologies into the core business by transitioning away from virgin resources. Key enablers of this transition are increased the use of secondary (recycled) materials and waste-based feedstocks in our production processes and prioritising sustainable sourcing practices to ensure responsible use of renewable resources. Through investments in petrochemicals, biofuels, and biomethane, we aim to contribute to lower-carbon, resource-efficient solutions and support the broader energy transition.

These principles are integrated into MOL Group's process-based policies, captured by three key area books:

- The ***Downstream Development Area Book***, managed by the Group Downstream Production and Development Senior Vice President, defines the strategy and roadmap for the Downstream business and ensures its implementation through efficient processes. It supports large and strategic projects by providing conceptual solutions, centralizing resources, and building team competencies focused on fossil fuel reduction, petrochemical growth, alternative energy solutions, and CO_2 footprint reduction. Development projects are evaluated using long-term economic modelling and technical feasibility assessments, forming the basis for early decision-making. This approach integrates new projects into existing assets to optimize business benefits and ensure sustainability. The centralized, integrated team ensures efficient resource allocation for maximum impact.
- The ***Optimisation, Sales and New Businesses Area Book*** emphasises, that besides the maximization of profitability on existing markets, disciplined cost control and enhancing digitalization and -driven and efficiency focused mindset, the introduction of new services and products is also a key priority. It outlines the main processes of key business fields supervised by the Group DS Executive Vice President:
    - **Group Value Chain Management (VCM)** with the main objective to manage the long-term planning and strategy about how we use and develop existing assets within Downstream.
    - **Group Fuels** and **Group Chemicals** with the main objective to manage the existing Downstream businesses and ensure the success of transformation under increased volatility of markets.
    - **Group New and Sustainable Businesses** (hereinafter: NSB) with the main objective to ramp-up to progress in developing sustainable solutions and new businesses and to create a new way of managing these initiatives.
- Lastly, the ***Downstream Production Area Book*** establishes the Group-level framework for MOL Group's hydrocarbon refining and petrochemical production sites, which are key assets of the company. Its primary objective is to create value for customers by transforming raw materials into high-quality, marketable products through safe, sustainable, and efficient operations. Implementation is supervised by the Group Downstream Production Senior Vice President.

MOL Group's internal policies ensure a responsive risk management system enabling the company to react to supply chain risks, such as shortage of services, feedstock, products to be obtained from market (RK-08). Through the ERM process, supply chain disruptions were identified as operational risks. Maintaining crude supply security and flexibility is a key pillar of the strategy and integrated into the ***Optimisation, Sales and New Businesses Area Book's*** processes.

Besides managing the risks associated with the supply chains of its legacy business, embracing EU's 2025 long term strategic objectives and national policies pushing towards a green energy transition is a must. Therefore a cornerstone of the ***Shape Tomorrow Strategy*** is to play a key role in shaping the low-carbon circular economy with investments in new businesses and actively pursuing opportunities to diversify towards alternative energy sources:

- **Sustainable chemicals:** MOL Group's commitment to transitioning from fuels to sustainable chemicals is embedded in our ***Shape Tomorrow Strategy*** and operationalized through the ***Downstream Production Area Book*** and the ***Optimisation, Sales and New Businesses Area Book***. **Sustainable chemicals:** MOL Group's commitment to transitioning from fuels to sustainable chemicals (OP-03) is embedded in our ***Shape Tomorrow Strategy*** and operationalized through the ***Downstream Production Area Book*** and the ***Optimisation, Sales and New Businesses Area Book***. Guided by a shift toward medium-sized investments, we are prioritizing downstream production to diversify away from fossil fuels while delivering key projects like Polyol and expanding the value chain with mid-scale investments in circular chemicals. This includes processing mixed waste plastics into petrochemical feedstocks, integrating circular economy solutions into our operations. The Product and Asset Portfolio Management framework defines our product and asset strategies, focusing on polymer recycling, low-carbon chemical businesses, and emerging value chains to meet regulatory and market demands while enhancing long-term competitiveness.

- **Bio- and waste-based fuels for road transport**: The renewable share obligations of transportation fuel (RED III and FQD[35]) are continuously increasing, accordingly the biocomponent content expectations have also increased across MOL Group's fuel markets, which have so far been met mainly by blending bioethanol and biodiesel, with plans to increase the waste-based fuel production capacities as part of the ***Shape Tomorrow Strategy*** (OP-08). MOL Group has an **ISCC certification** for co-processing of waste materials, ETBE production and trading and storage of biofuels. Processes related to the biofuel compliance strategy of MOL Group are included in the ***Optimisation, Sales and New Businesses Area Book***: MOL Group continuously monitors regulations to ensure compliance and inform country-level bio blending and compliance plans. Compliance strategies are shaped by analysing market trends and optimizing a cost-effective bio compliance matrix, supported by the exploration and testing of new bio feedstocks and components, while maintaining seamless refinery and logistical operations through monthly biofuel flow scheduling. Post-evaluation involves reconciling biofuel inventories and sales to prepare compliance reports, with adjustments made to supply plans as needed, alongside providing Proof of Sustainability in alignment with customer and business unit requirements.
- **Sustainable Aviation Fuels:** Supplying SAF is mandatory starting from 2025 as per the ReFuelEU Aviation. Slovnaft and INA are mandated parties as aviation fuel suppliers, and MOL is providing wholesale supply for mandated parties in Hungary, which parties are interested in MOL supplying them with SAF in addition to jet.
- **Biogas:** Utilisation of biogas and biomethane as an energy source (OP-11) is an key element of the ***Shape Tomorrow Strategy*** and integrated into the ***Downstream Development Roadmap 2025*** (as described in the *Downstream Development Area Book*). It also support Mol Group's compliance with the above mentioned EU's Renewable Energy Directive (RED III).
- **Green hydrogen production** (OP-01) is also a prominent case of our sustainability & diversification efforts - see relevant disclosures in Chapter E1.

ACTIONS RELATED TO RESOURCE USE

/E5-2/

This section describes the key step in 2024, and planned actions related to the identified risks and opportunities of the Downstream segment.

Supply chain risk management & crude diversification actions

MOL Group is dedicated to ensuring a stable and sufficient market supply within its core region while adhering to EU sanctions. To address identified risks in the crude oil value chain (RK-07), particularly due to sanctions on Urals crude, MOL Group has accelerated its crude diversification efforts. On top of the regular processes in place for tactical planning to secure customer supply (as described in the *Tactical Planning & Margin Management* element of the ***Optimisation, Sales and New Businesses Area Book*** and in the ***Downstream Tactical Planning and Margin Management Process Description***) a crude diversification program has been launched in 2022. It includes an investment of USD 500 million with the aim to achieve 100% capability to process alternative crude oil by 2026 at the landlocked refineries in Százhalombatta and Bratislava, thereby ensuring regional supply security. Actions include a continuously development of technological capabilities to increase the intake of non-Russian crude. Since 2022, MOL Group has tested over 10 different alternative crude types, with Slovnaft processing close to 1 million tons of alternatives in 2023. Our diversification efforts also aims to mitigate potential disruptions from interruptions in the Eastern crude supply via the Druzhba pipeline or the Adria supply route. To enhance the utilization of the Adriatic pipeline, MOL Group has entered into a partnership with JANAF, the pipeline's owner and operator.

Sustainable chemicals

As part of its commitment to advancing sustainable chemical solutions (OP-03), in May 2024, the Polyol complex, MOL Group's largest organic investment has been inaugurated, further strengthening the company's downstream capabilities. The chemical recycling facility at MOL Petrochemicals Co. Ltd. in Tiszaújváros, Hungary, planned to process 40,000 tons of mixed waste plastics annually, will reduce reliance on fossil raw materials for plastic production and aligns with the company's goals of increasing circularity and mitigating environmental impact. MOL Group has partnered with Lummus Technology to advance sustainable chemical solutions, focusing on the chemical recycling of plastics. This collaboration involves establishing a facility that utilises Lummus' Green Circle pyrolysis technology to transform plastic waste into high-value petrochemical feedstocks, promoting circularity. The plant will also feature advanced greenhouse gas (GHG)

[35] The Commission adopted in June 2023 new rules establishing the share of biofuels and biogas in mixed fuels, co-processed using bio-based and fossil-based raw materials, and that can count towards the Renewable Energy Directive target for renewables in transport. The Delegated Regulation (EU/2023/1640) was published in the Official Journal of the EU on 18 August 2023 and has been subject to public feedback, several consultations and scrutiny from the European Parliament and the Council. The revised Renewable Energy Directive establishes binding targets for the share of renewable energy in the transport sector, including maritime and aviation. By 2030, EU countries are required to either achieve a share of 29% of renewable energy in transport, or to reduce the emissions intensity of transport fuels by 14.5%, as well as a combined sub-target for renewable hydrogen and advanced biofuels of 5.5%.

reduction design elements, including a fully electric pyrolysis reactor which will result in zero direct scope 1 emissions from the unit during normal operation. Integrating these new processes with MOL's existing facilities optimizes the value chain and enhances sustainability. The design phase of the chemical recycling plant commenced in 2024, with subsequent project phases yet to be announced. This project exemplifies the application of circular business practices, transforming waste plastics into feedstocks that are reintegrated into production and reducing reliance on virgin materials. Innovative technologies, such as electric pyrolysis reactors, lower emissions and further MOL Group's commitment to sustainability and the circular economy. Supporting these efforts, MOHU's initiative to collect and treat up to 5 million tonnes of municipal solid waste provides critical feedstock for the pyrolysis unit. By addressing the recycling gap for typically non-recyclable plastics, the project closes the loop in material usage. The recycled feedstocks are reintegrated into production lines, while the zero-emission reactor technology enhances environmental sustainability, aligning with MOL Group's strategic focus on circularity and sustainable growth.

Bio- and waste-based fuels for road transport

In line with EU's biofuel mandate (as explained in the Policy section of this chapter) MOL Group has blended over >600 kilotons of biofuels into its fuel products sold in 8 countries in 2024, saving approximately 2 200 000 tons CO2 emissions. Blended biofuels include food- & waste based bioethanol and fatty acid methyl esters obtained from the market and via joint-venture operations (Meroco, Rossi Biofuels). Furthermore, since March 2020, after several years of research and development, MOL Group has stepped up the value chain and has become a biofuel producer, through the realisation of an investment in the Danube Refinery. At its facility in Százhalombatta, over 15 kilotons of renewable feedstocks (for example vegetable oil) were co-processed together with fossil materials in 2024, increasing the renewable share of diesel, reducing up to 55 000 tons /year CO2 emission. A key advantage of this innovative method is that the resultant biodiesel can be still blended with a maximum 7 percent of fatty acid methyl esters in line with diesel standards, allowing the overall bio-share of the fuel to be higher without negatively affecting fuel quality.

Sustainable Aviation Fuel

MOL Group is also advancing sustainable aviation fuel (SAF) initiatives to support the aviation industry's transition to greener alternatives and align with its low-carbon, circular economy goals (OP-10). MOL Group has conducted a tender to purchase sustainable blending components (SBC), to be used for SAF-containing jet A-1 fuel. These purchases support SAF distribution either wholesale or directly into planes across Slovakia, Hungary, and Croatia, sourced from major European providers. This initiative addresses imminent regulatory changes, as relevant legislation take effect on January 1, 2025. The tender process is expected to occur annually, with its structure adapting to market developments. Spot purchases are also anticipated throughout 2025 to ensure total demand is met. The required SBC must achieve a minimum of 80% carbon emission savings, showcasing the environmental benefits of this initiative. MOL Group's current operating expenditure (OPEX) for these activities is estimated at EUR 75 thousand, reflecting costs specifically associated with infrastructure development for SAF, demonstrating that MOL is not only engaged in trading but is also actively investing in system development. These measures highlight MOL Group's commitment to reducing emissions and delivering higher value for consumers in the aviation sector. These developments gave the Group the ability to load road tank cars with SAF at a logistic depot that also has rail loading and unloading capabilities, which ability uniquely connects on rail the CEE consumers supplied on road with SAF distribution centers.

Biogas and biomethane

MOL Group is advancing its position in the biogas value chain with the ambition to become a regional leader by 2030. (OP-11). Biogas production contributes to CO2 reduction, waste-to-energy conversion, and economic benefits like job creation in the feedstock supply chain. The biogas and biomethane initiative exemplifies circular business practices by converting bio-waste into renewable energy and minimising methane emissions. The waste-to-energy model integrates sustainability by reusing resources, enhancing efficiency, and leveraging byproducts like digestate in agriculture. Stakeholder collaborations with local waste management, agriculture industries, and gas distributors ensure broad benefits while fostering a circular economy.

The Group has prepared a biogas roadmap and initiated strategic steps, including the acquisition of its first biogas plant near Szarvas, Hungary in 2023. This facility processed over 100,000 tons of residual waste from regional food producers, farmers, and livestock producers, yielding more than 12.5 million cubic meters of biogas in 2024.

Additionally, INA Group plans to establish a biogas and biomethane plant in Sisak, Croatia, using agricultural waste to expand the company's renewable energy portfolio, delivering advanced, sustainable fuel for the transportation sector. The project will have an annual production capacity of 3 kilotons (approximately 4.2 million cubic meters of biomethane) by processing 75 kilotons of bio-waste feedstocks each year. The biomethane will be injected into the local gas grid. Progress milestones include plans for mechanical completion by Q2 2026. Financial resources for the project are allocated to CAPEX investments of EUR 45 million with projected annual operational expenses of EUR 2.5 million covering feedstock, utilities, workforce, and maintenance. The project will contribute 0.4% (double-counted) of INA's total fuel pool, replacing fossil fuels with biomethane and supporting regulatory compliance and reaching the EU's renewable energy targets.

METRICS RELATED TO RESOURCE IN- AND OUTFLOWS OF THE DOWNSTREAM BUSINESS SEGMENT

/E5-4; E5-5/

The tables below present the main inputs and outputs of MOL Group's Downstream segment in 2024. Background information can be obtained from section Strategy & Business model of this report.

Main resource inflows /E5-4/:

Input materials	Refinery processing (kt)
Own produced crude oil	858
Imported crude oil	12 448

Main resource outflows /E5-5/:

Refining:	Refinery production (kt)	External sales (kt)
LPG	391	348
Naphta	1 423	38
Motor gasoline	3 154	3 802
Diesel and heating oil	6 702	11 505
Kerosene	537	713
Fuel oil	279	237
Bitumen	571	569 (+ 0.7 rubber bitumen)
MOL Group internal transfer for petrochemical feedstock	1 821	-
Petrochemicals	**Petchem production by product type (kt)**	**Petchem sales by product group (kt)**
Olefin products	1 530	178
Polymer products	864	848
Butadiene products	74	76
Raffinate	114	0

SUB-CHAPTER C: MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CIRCULAR ECONOMY SERVICES

IDENTIFIED IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CIRCULAR ECONOMY SERVICES

/E5. SBM-3/

This section outlines the impacts, risks and opportunities associated with the Circular Economy Services (CES) segment of MOL Group:

Table IM-07: Providing waste management & circular economy services

Severity	Significant, actual positive impact
Scope	Country level (Hungary)
Likelihood	Actual
Description	As part of its strategy, MOL Group diversifies its portfolio towards waste management & circular economy services, to convert waste streams into valuable products such as chemicals, fuels or plastics, and become a driver of transitioning to a circular economic model. Activities within CES segment include collection and treatment of waste generated; waste recycling; waste energy recovery, and supporting Group entities by providing feedstock, such as biofuel production from waste-based biological materials. As an impact, MOL Group contributes to decreasing pollution from waste disposal & reducing virgin material need, by reaching EU-wide targets set in the matter. This means all CES ventures support to comply with the requirement of landfilling maximum 10% and preparing for reuse or recycling 65% of all solid municipal waste generated in Hungary, by 2035/2040.
Actions	MOL Group's actions focus on ensuring business continuity and making investments in emerging green technologies and efficient business solutions.
Time horizons	We consider the matter material across all time horizons, to an increasing extent.
Relevance in the value chain	Approximately one fifth* of all waste generated in Hungary consists scope of MOHU Zrt.'s concessionary activities – being responsible for the collection and treatment of solid municipal waste via its partners. Other entities of the segment either contribute to these activities, or shall take part in the value chain of secondary raw materials.

* Hungarian Central Statistical Office

Table RK-06: Risks due to waste handling & recycling capacity bottlenecks

Type	Operational risk
Likelihood	Medium
Magnitude of financial effect	High
Description	Significant amount of waste is produced during O&G activities, which poses the liability for safe disposal on the company. MOL Group has well-developed polices to ensure the safe disposal of waste, however, increasingly stringent regulation and EU-level recycling and landfilling targets requires significant investments from the company. Furthermore, by establishing the CES (Circular Economy Services) segment of the Group, the entry into the waste management and circular economy activities means novel risks related to other than only waste producing operational areas. For MOHU Zrt., to manage and organize the national waste handling system with 10+ thousand employees and 1+ thousand sites of subcontractors poses operational and legal risks, as non-compliance in any area can have far-reaching consequences for the firm.
Related impact & dependencies	Associated impact related to the generation of waste – mainly during heavy industrial activities (IM-08) and in the form of waste management services in Hungary under the CES segment (IM-07).
Mitigation actions	Mitigation of risks related to negative impacts on people and the environment include safety protocols and handling procedures, education, maintenance actions, regular controls and remediation actions where necessary – see DR E2-1, DR E2-2, E5-1 and DR E5-2. Actions related to reducing the ratio of waste landfilled and increasing the ratio of waste recycled in Hungary are incorporated into the business principles of the CES segment, and the concession agreement of MOHU Zrt. – see DR E5-3 and OP-2 for more details. The segment's strategy and activities are ultimately directed towards meeting the relevant EU targets set for the nation.
Financial effect & time horizons	Financial effects stem from both the handling of waste generated by MOL Group and waste handled by CES. The estimation on the magnitude of financial effect includes the associated CAPEX to ensure regulatory compliance and reduce environmental impact; and OPEX to ensure safe waste disposal (see DR E5-2 and DR E5-6). It excludes revenues associated with providing waste management services – see OP-02 for relevant information. Since circular economy is a key part of MOL Group's business strategy, the topic is considered crucial from financial materiality perspective on all time horizons.
Relevance in the value chain	Risks related to the handling of waste generated by organization is relevant across all value chains related to MOL Group's industrial activities. However, this sub-chapter is focused on how risks due to waste handling & recycling capacity bottlenecks is managed related to MOL Group's CES segment. For disclosures of own waste, see E5 - sub-chapter A.

Table OP-2: Waste management services

Maturity	Implemented at scale
Likelihood	High
Description	By integrating waste management into its operation, MOL Group can be a driving force for reaching a circular modus operandi. MOHU Zrt., the concession company for waste management in Hungary can push for national recycling targets while providing valuable feedstock for various businesses of the Group or the CES segment, thus facilitating compliance with EU legislation.
Related impacts, risks and dependencies:	The complexity of the waste management concession and all affected parties create a landscape where it becomes challenging to exert a positive impact on the whole system. While there are inherent risks associated with this task (RK-06), by carrying out the strategy of the segment, these risks can be mitigated and consequently, a positive impact can be fostered (IM-07). Thus, a more sustainable national economy can be achieved, as progressively decreasing the dependency on virgin materials and efficiently utilizing waste-to-energy technologies pave the way towards a more circular economy.
Financial effect & time horizons:	This opportunity is already pursued by MOL Group since the kick-off of its activities related to the waste concession in 2023. As part of its commitment to the concession, MOHU Zrt. is to invest USD 0.9 billion in the Hungarian waste management industry to its further development. Additionally, material, strategy-driven investments are to be made into utilizing this feedstock, and into recycling and medium-scale chemical technologies in other Group areas as well. Therefore, it is considered financially material in all time horizons.
Relevance in the value chain	In Hungary, MOL Group, by MOHU Zrt., is solely responsible for all residential waste generated. MOHU can positively influence the industry through the complete value chain that is defined by the concession agreement. It can also provide feedstock for other segments, for CES and Petrochemicals, to replace virgin materials in production processes, or energy generation.

POLICIES RELATED TO CIRCULAR ECONOMY SERVICES

/E5-1/

For the Circular Economy Segment, the main guiding policies in the daily operation are:

- **Circular Economy Services Area Book**,
- **Concession Contract for MOHU Zrt.** (hereinafter: Concession Contract),
- **Integrated Management System of MOHU**.

As of the scope of this report, MOHU Zrt. (hereinafter: MOHU) is the primary entity with active operations, while other subsidiaries under the segment are either companies with joint ownership structure (e.g., MOHU Budapest Zrt., hereafter: MOHU BP), or without any operations currently. Segment-level policies apply to all of them, nonetheless.

The **main guiding policy for the CES segment is the *Circular Economy Services Area Book***, which is the highest-level process-based regulation, focusing on end-to-end processes describing the operation model and rules for operation of the segment, without any geographical limitation, and so is to be implemented at all companies of the division. Currently, due to CES being in early setup and or/immature phase of operations, this policy is only valid for Hungary, and via MOHU companies, it covers the value chain from end-users of products (i.e., waste producers, population and industry) to secondary raw material sales, including collection and treatment, with intent to build out recycling activities.

Affected stakeholders are all value chain partners, all relevant regulatory and industry associations, and other organizations of MOL Group – the policy aims to find collective optimum for all parties, to be beneficial in all bilateral relations. With all other stakeholders, defined goals and mission is appearing in “informal” way – through approach in contractual proceedings.

Due to its generality, it is valid for and includes approaches towards the identified impacts, risks, opportunities. Within CES, accountable level for implementation of policies is Head of CES.

The policy integrates the strategic direction of the Group by addressing all uncertainties and opportunities identified as relevant IROs in the materiality assessment. MOL Group’s strategic target is to expand its petrochemical product portfolio with recycled plastic feedstocks. In this effort, MOHU and CES leverage their influence within their respective value chains to standardize high-quality, homogeneous systems across all operations in Hungary. Furthermore, the firm is also committed to producing as much energy as possible from wastes that cannot be recycled, primarily through incineration.

Value chain definition applied in MOHU’s operation is that waste collection services shall be coordinated exclusively through subcontractors – legislation and official regulations are taken into account, as well as internal and external customers’ satisfaction is always considered, while at the same time, reliable and efficient solutions must be provided. The value chain is further defined or limited to the activities described in the Concession Contract.

With the introduction of the Extended Producers Responsibility (EPR) system in Hungary, and since MOHU operates the aforementioned system, it is important to ensure the proportionate financial burden of the relevant producers through EPR fees. Actions and measures with EPR relevance shall strive for the maximum fulfilment of the targets relevant for the certain EPR product/waste category while keeping costs at a reasonable and proportionate level. In order to meet CES Strategy fitting parallelly to EU and National waste management directives, and KPIs set in the Concession Contract with the Government, CES and within that MOHU shall plan, develop and implement investment projects. In case of all investment projects, all relevant internal stakeholders and contributors shall evaluate the proposed project’s strategic fitting in order to eliminate duplications and contradictions with CES strategy, and so this project management approach shall resonate with identified material IROs.

In order to achieve MOL Group's Circular Economy objectives, the 4 Rs Concept, Reduce-Reuse-Recycle-Recover, is integrated into the everyday approach and operation of the division, and so they should be applied in the businesses' operational processes. CES segment and belonging entities shall monitor the implementation continuously. One of the main declared aims of CES is moving towards higher level Rs by providing valuable secondary feedstock to the whole economy, thus supporting both MOL Group and external buyers transition away from virgin inputs as much as possible. This way, and by applying an objective-oriented secondary raw material trading approach, CES shall contribute to the achievement of national EU recycling targets. Furthermore, the 4 Rs of waste hierarchy are promoted through the value chain: a) for partners, by means of contracting, cooperation and investments, and b) for consumers, mainly via educational and awareness raising campaigns.

Through these principles and way of operation, CES influences partners (e.g., via contractual relations like regional coordinators [subcontractors], or indirectly population via DRS) in value chain towards a more sustainable, circular way of operating.

In terms of internal regulations and policies, there is no need to cover sourcing as MOHU is a service company (i.e., no material processing or manufacturing is taking place). Other CES entities are currently irrelevant from this point of view, since they are either non-operating, or are in the integration/setup phase.

The ***Concession Contract*** that is relevant to the core and largest company of the CES segment, MOHU, sets the framework for operation and limits the scope of activities. It relates to the identified impact and appears in the contract as commitment to EU targets and committed CAPEX spend (185 billion HUF). However, KPIs and targets set in the contract cover a wide array of topics, they all relate to the two main Waste Framework Directive targets of the EU. Nonetheless, not only impact but main risk also comes from the contract – if breach happens, consequences can/might range from monetary penalties to the possibility of the concession to be lost.

Due to the nature of the concession, operation and planning is monitored in a price regulated environment, by the Ministry of Energy and the Hungarian Energy and Public Utility Regulatory Authority, who scrutinize the efficiency and strategic direction of MOHU, which shall be directed towards delivering the KPIs set in the Contract. This includes the detailed investigation of the assets and the costs which takes place before every price regulatory cycles. According to the Concession Contract, a preparation period (28.07.2022 – 01.07.2023), a transition period (01.07.2023 – 31.12.2026), and price regulatory cycles (01.01.2027 - 31.12.2058) are separated. The preparation and transitional periods are based on estimated costs because of the lack of fact data and followed by four-year-long cycles based on factual eligible costs with an annual data request and annually updated fee proposal. Waste Act allows a possibility of fee modulation which involves the representatives of manufacturers and distributors, in a framework of a fee council. Fee modulation leads to a possibility of creating a specific modulated fee of a certain product stream involving ecological, social or product life cycle-based modifications, and aims to find a compromise between all relevant stakeholders, and simultaneously, develop the system towards reaching waste management targets.

A publicly available and stated manifestation of the principles set in the Concession Contract and internal regulations for MOHU is operating an ISO 9001, ISO 140001 certified **Integrated Management System**. The main goal of this policy is to increase use of secondary raw materials – reflection to MOHU impact and opportunity in this field. The aim is to cooperate with partners in a mutually beneficial way, and improve our processes by accepting their feedback. All our policies are updated based on reflections to internal and external changes, especially risks.

ACTIONS AND RESOURCES RELATED TO CIRCULAR ECONOMY SERVICES

/E5-2/

In case of the CES segment of MOL Group, measures taken are mostly, due to ownership structures and actual maturity phases of entities, relevant to and are in connection with MOHU.

MOL has been awarded the public waste management concession in July 2022 in Hungary, the ultimate aim of which was to enable the state to meet the recycling and landfilling targets set by the European Union until 2040 (if derogation is applied). MOL established the concession company, MOHU (MOHU MOL Waste Management Ltd.) to perform the following tasks in line with concession commitments:

- MOHU contracted 6 regional coordinators and 16 regional subcontractors, all 56 pre-treatment partners, and 217 institutional service providers in 2023.
- As the concession came into force in July 2023, the extended producer responsibility (EPR) system was introduced with MOHU as the operating entity.
- Besides crucial operation tasks, MOHU started to create the foundations for several main projects launching in 2024, such as the development of new separate collection of biodegradable household waste or the introduction of the deposit refund system (DRS) – the initiation of both being legal requirements and a consequence of state decisions. These projects aim that the various waste streams are to be collected in a clean and separate way, giving the opportunity to be directly recycled instead of incineration or landfilling.

In the frame of the current waste management operation of Hungarian waste system, there is a transition plan on how to change in the future. In terms of current and future financial resources, the aim is to have an organic investment roadmap for the upcoming five years amounting up to USD 0.9bn, mainly focusing on finishing the roll-out of deposit refund system, investing in the upgrade and development of waste collection and sorting system and infrastructure, as well as construction of a waste to energy plant.

This pipeline of projects, by spending 80% of capital expenditure on low carbon initiatives, supports the realization of all commitments made towards enhancing the Hungarian waste management scene – realize positive impact, mitigate risks, and lay groundwork for capitalizing on opportunities. Geographical scope of these investments and efficiency programs is currently Hungary only, focusing on activities from collection to processing of waste. Efficiency programs, current facility, logistics and other “short lifespan” projects need to take effect in short-term.

Whole waste system development plan, GFRT (“*rolling development system plan*”), is aligned to reach EU targets by 2040, it is a 10-year-long plan that is revised by MOHU and officially approved by bodies of the Hungarian government annually.

Cooperation with two of the main keyholders (Ministry of Energy in Hungary and the Hungarian Energy and Public Utility Regulatory Authority) is open and productive, in order to make it possible to reach strategic goals: shortly before and since July MOHU start, relevant legislative acts and methodologies were published, while on the other hand, a completely new, cost based price regulation has been established and fees for the EPR system have been announced, both in the previous years, 2023, and 2024.

EPR (Extended Producer Responsibility)

EPR system was launched on 1st July 2023. MOHU, in her capacity as the designated operating and coordinating organization, is responsible for the arrangement of collection, pre-treatment and handover for treatment that is necessary for reaching the recycling targets set by the EU, in case of the waste generated in circular product categories. Based on the Polluter Pays Principle, producers cover the related costs by means of the producer fees. Thus, a significant share of MOHU's activities is directed at planning, organizing, contracting, monitoring, and financing these EPR-related functions.

The Partner portal was launched for the registration of industrial/business partners, and IT development projects are under way to provide a more efficient process.

Within terms of the EPR system, MOHU has started an intensive communications and educational campaign to strengthen selective waste collection, and preparatory works have started for the technological development of pre-treatment and separational facilities. These, thanks to the educational efforts, will be able to contribute to a more efficient operation with higher recycling rates of growing volumes of cleaner, more homogeneous, selectively collected waste streams.

DRS (Deposit Refund System)

The system came into full effect on 1 January 2024, however – due to a 6-month transition period – only started real operation in July. With close cooperation with retail partners, more than 3,700 reverse vending machine units (RVMs) have already been procured and installed, available at retail networks, along with 1,500 contracted manual takeback points. Penetration of the system stabilized at 6 million beverage packaging returned per day in the fourth quarter.

Regarding the operation of the system, it is important to highlight, that:

- range of available RVMs is defined so retailers can select based on their needs and expected customer turnover,
- for those stores that cannot install fix RVMs for any reason, manual return is offered, supported by the so called mobile RVM service which collects, identifies and compacts material on the spot, avoiding transporting non-compacted material to counting centers (as it happens in any other DRS),
- stakeholder management and dialogue with industry associations is continuous for optimizing the DRS system,
- MOHU attends relevant industry events and conferences,
- campaigns have been launched for both retail partners and consumers.

Promotion of circularity with cooperation, by reach optimum with producers, retail partners, sorting facilities and finally, buyers of materials supporting the achievement of long-term targets.

Infrastructure and logistics developments

The first own waste yard investment in Esztergom had been completed and started its operation in May 2024 Further 9 are in preparation phase as part of the new concept – cooperation and discussion are ongoing with local municipalities. With wasteyards, goal is to promote selective waste collection among population, and create as many separate clean waste streams/categories as possible, which simplifies the waste treatment and increases recycling process efficiency afterwards.

Pilot phase for biological waste collection has started – based on evaluation of results of the pilot, and discussions with partners, MOHU will develop the system in the medium term. Procurement of additional assets is under preparation. MOHU hosted educational and awareness raising presentations about the bio collection system to support new collection roll-out efficiency.

Development of the textile waste collection infrastructure reached a significant milestone, having already approx. 850 textile containers installed across Hungary. Separate collection of textile waste, and the purchase of collection containers contributes to diverting used clothes not only from disposal to recovery, but towards higher waste hierarchy levels (reuse).

Procurement of new waste collection vehicles is in progress (was launched) in order to decrease the average age of vehicles park. Evaluation criteria are under discussion in order to provide partners with assets that can most effectively contribute to the requirements of a changing waste management landscape in Hungary.

Key approach in our asset investments is always aiming to opt for the most efficient solution. MOHU colleagues are regularly having contact with local communities, and, related to subsegments and waste streams. Flyers, online and offline communication campaigns are continuous towards relevant parties.

All investments are aligned with the Concession Contract committed HUF 185 bn plan. However, MOL intends to dedicate around USD 0.9 bn (HUF ~350-380 bn) capital into the development of the CES segment instead, almost double the original commitment.

Dialogue is continuous with regulator, by sharing data mutually, providing recommendations for regulation changes to make the waste management system more transparent and efficient (in terms of what else shall be regulated to be able to reach main EU targets)

In 2024, CES segment was extended with a joint venture, MOHU Budapest, between MOL and BKM Budapesti Közművek, in a 50-50% ownership structure. To partner up was a step towards implementing the strategy of the segment and moving closer to realizing targets and commitments that the concession entails, these actions being aligned with the identified IROs at the same time. The rationale behind establishing MOHU Holding was similar, inter alia to exert influence on regional and local waste management firms, harmonize and optimize their operations, and begin to transform these operations with the defined targets at the cornerstone.

However, there is a key general takeaway: while the largest CES segment company, MOHU operates in a tightly regulated market and a regulated price environment which define and limit the scope of activities that MOHU can do, other CES segment entities (wholly MOL-owned) can operate under free market conditions. As local laws, and the Concession Contract both define the framework in which MOHU conducts its business, there are investments imperative for circularity that can be taken by MOL Group, and potentially belong to CES division.

This price regulation methodology of the waste management public tasks covered by the concession is based on Section 53/N Hungarian Act CLXXXV of 2012 on Waste (Waste Act) in accordance with MEKH Decree 16/2022. (21 December 2022) of the Hungarian Energy and Public Utility Regulatory Authority (MEKH) on the principles and framework for the determination and regulation of the eligible costs of the concession company performing the public task of state waste management, the concessionary subcontractors (hereinafter „CS") and the municipalities, as well as the preparation of fee proposals on the fees to be collected for the service of the public task of state waste management.

The methodology contains the basic principles and framework rules for determining and regulating the eligible cost and expenses of the concession company and CS as well as in the public service and institutional subsystems like the extended producer responsibility (EPR) subsystem, the deposit refund subsystem (DRS), the subsystem of the separately collected waste of companies and the public cleaning waste subsystem (they are called 'subsystems').

Because of the setup of the waste management system, affected stakeholders exert a great influence. The Ministry of Energy of Hungary and the Hungarian Energy and Public Utility Regulatory Authority both closely monitor and regulate how the system is operated. Among others, they monitor compliance with the Waste Act, as it prescribes for MOHU that for valuable waste, compensation has to be paid for the waste generating undertaking – should the extent of the compensation be debated, MEKH might be requested to facilitate and decide based on their methodology. Furthermore, the regulation in effect puts emphasis for the affordability and service level of public services. Therefore, stakeholder management itself, and their priorities and requirements are heavily taken into account when designing a development roadmap for a more sustainable waste management system in Hungary.

TARGETS RELATED TO THE CIRCULAR ECONOMY SERVICES BUSINESS SEGMENT

/E5-3/

Main targets of the segment originate from the ***Concession Contract***, and commitments made there. Currently, only MOHU is concerned in terms of these indicators, as other subsidiaries with total control are in setup phase and so do not have any productive operations.

Highest level targets are related to the EU Waste Framework Directive (WFD), and relevant sections are the ratio of landfilling and ratio of recycling, of waste volumes with relevance under the directive. These targets are applicable for Member States and have been cascaded down to MOHU as official targets, and influence operations and decisions in the following way:

- Aforementioned targets have positive **impact** of making Hungary more sustainable and circular;
- MOHU aims to avoid the **risks** by making decisions that ensure business/industry continuity, and develop the Hungarian waste system so no facility shortcoming can threaten the reach of EU targets [e.g., have enough waste to energy (incineration) capacity as landfill target is unreachable without it; however, as this is out of the concession's scope, the parent company (MOL Group) can be the decision-making entity];
- as an indirect effect, by enhancing Hungarian waste management system, volume and pureness of secondary raw materials can be increased, thus it is easier to provide feedstock to be recycled and to realize **opportunities**.

In CES, and currently mainly in MOHU, policies and via that, actions are driven by these objectives, and actions are taken in line with the policies. These targets are coming through main stakeholders – regulatory and authority bodies EM (Ministry of Energy) and MEKH. Following targets are relevant and declared as of now:

Build a Minimum 100 kt Capacity Waste-to-Energy (W2E) Plant

MOL Group recognizes in its strategies and policies that certain materials cannot be recycled. These approaches have been approved by key stakeholders. Waste incineration helps us moving waste otherwise disposed to be used for energy recovery, which is a higher method in the waste hierarchy. Thereby, project is aligned with the two waste targets from the EU Waste Directive, ensuring compliance with regulatory requirements and helps supporting concession commitments.

EU Landfilling Target: Maximum 10% of Municipal Solid Waste (MSW)

The goal is to reduce landfilling by keeping waste management within the waste hierarchy, avoiding disposal wherever possible. The target supports circularity and mitigates risks of non-compliance with EU goals and concessions commitments. The target is based on Council Directive 1999/31/EC on the landfill of waste with a deadline until 2035, with a possible derogation extending to 2040 if granted. All CES firms contribute to meeting the requirement, which states that Member States must reduce MSW landfilling to 10% or less by 2035. This directive, strictly monitored by EM/MEKH, assigns responsibility primarily to MOHU. The target is relative, with 2023 as the baseline, when landfilling was around 50%. MOHU's operations started in 2023, marking the start of progress measurement.

EU Reuse or Recycling Target: Minimum 65% of MSW

The target relates to nearly all levels of the waste hierarchy, above energy recovery, emphasizing the importance of reuse and recycling. The target is based on Directive 2008/98/EC, which mandates Member States to achieve a minimum of 65% reuse and recycling of municipal waste by 2035 and represents a significant business opportunity for MOL Group. All CES firms contribute to achieving this objective, enabling a high level of resource efficiency within a European circular economy. MOHU holds the primary responsibility, with other CES firms benefiting and contributing. The target is relative, with 2023 as the baseline, when reuse and recycling rates were approximately 34%, as MOHU had just initiated operations.

Investment Commitment: 185 Billion HUF

This investment is designed to promote recycling and recovery, with potential implications for reuse. The commitment addresses impacts and risks identified during the materiality assessment, while providing a foundation for new business opportunities for MOL Group segments. The investment must align with the concession agreement with the Ministry of Energy, reflecting a joint understanding of objectives. The deadline is 2033, covering the firm concession period (2023–2033). The target is absolute and rolling/cumulative, with the baseline being the concession start in 2023. By the end of 2024, the investment reached 53 billion HUF. MOHU bears the primary responsibility, with Holding and MOHU BP benefiting as receivers of developed assets.

METRICS RELATED TO RESOURCE IN- AND OUTFLOWS OF THE CIRCULAR ECONOMY SERVICES BUSINESS SEGMENT

/E5-4; E5-5/

Current metrics are defined according to the commitments MOHU made. These metrics are integral to targets and relate to all 3 IROs, and for waste volumes, have a 1-year lag in reporting due to legal limitations, and resulting process in cooperation with Ministry of Energy.

Data point	UoM	Target	2024	2023	2022
Ratio of MSW prepared for reuse or recycling	%	65%*	n/a	33.7%***	32.8%****
Ratio of MSW landfilled	%	10%*	n/a	49.5%	55.3%****
Committed CAPEX spending (rolling/ cumulative value)	HUFbn (USDmn)	185** (cca. 490)	53 (146)	21 (63)	n/a

* By 2035 (2040, if derogation is applied)
** Between 2023 and 2033
*** Based on 2023 half-year data
**** Not under influence of MOHU or CES entities

Methodologies and assumptions of relevant metrics are as follows:

- The two relative metrics stem from EU definitions, while capital expenditure (CAPEX) is only MOHU relevant – concession commitment spending spent by the sole concessionaire entity of CES.
- Ratio of municipal solid waste (MSW) prepared for reuse or recycling:
    - numerator: it is the sum of
        - waste prepared for reuse or recycling (handed over or into inventory), paper, plastics, metal, glass, from public service and institutional (i.e., separate collection of businesses' waste) subsystems
        - other wastes prepared for reuse or recycling, from selective collection (HAK/EWC 20, except 20 03)
        - green waste delivered for composting
        - green waste in home composting
    - denominator: it is the sum of
        - total MSW collected

    - green waste in home composting
    - LESS end-of-life vehicles, end-of-life tyres, demolition-construction waste
  - base unit of measure: kg per calendar year

- Ratio of MSW landfilled:
  - numerator: it is the sum of
    - MSW disposed of via landfilling
    - LESS ash and residue from incineration
  - denominator: it is the sum of
    - total MSW collected
    - green waste in home composting
  - base unit of measure: kg per calendar year
- *These two ratios are validated by the competent governing body, the Ministry of Energy annually, as part of legal data provision requirements*
- Committed CAPEX spending
  - validated through the auditor in the financial statements, all organic CAPEX spent by MOHU in a given financial year (reported as part of CES in Chapter 2. Segmental information of Consolidated Financial Statements 2024)

Regarding further disclosure requirements: from own operations, there is currently no own waste production, there is no resource inflow for own processes, and only resource outflow is clean secondary raw materials – MOHU is non-waste-generating from this point of view:

  - amount of non-recycled waste: not material (not only for MOHU, but all other CES firms),
  - hazardous waste and radioactive waste: not material.

EXCLUDED DISCLOSURE REQUIREMENTS FROM ENVIRONMENTAL STANDARDS:

Topic	Relevant IDs	Explanation
Anticipated financial effect	E1-9 E2-6 E3-5 E4-6 E5-6	Quantification of anticipated financial effects is under phase-in based on Appendix C of ESRS.
Carbon credits	E1-7	In 2024, MOL Group has not financed any GHG removals and GHG mitigation projects through carbon credits.
Pollution targets	E2-3_02 E2-3_03 E2-3_04	Currently there are public no Group-level targets set in relation to water and soil pollution prevention, prevention and control of substances of concern and substances of very high concern.
Microplastics	E2-4_05 E2-4_06 E2-4_07	We have not identified any material IROs in relation to microplastics, therefore associated disclosures are not considered material.
Substances of concern / substances of very high concern	E2-5_02 E2-5_07 E2-5_08 E2-5_13	Data on substances of concern / very high concern are only reported from the outflow perspective, i.e., those amounts which leave the facilities either as emissions, as sold products or as part of sold products. No services where identified where the use of substances of concern / very high concern is material.
Marine resources	E3-1_09	Extraction and use of deep sea minerals, gravels and seafood products are not considered material for MOL Group.
Water risk	E3-4_02 E3-2_03 E3-1_07	Based on the AQUEDUCT Water Risk Atlas, MOL Group's operation do not affect or are reliant on any areas with high water stress. /E3-1_07/
Biodiversity	E4-1 ESRS 2 SBM-3 E4-2_03 E4-2_04 E4-2_05 E4-2_06 E4-3_02 E4-3_03 E4-3_04 E4-2_18 E4-2_19 E4-2_20 E4-3_02 E4-3_08 E4-3_09 E4-4 E4-6_03 E4-6_04	During the latest double materiality assessment, impact on the extent and condition of ecosystems (IM-06) has been identified as a material topic. Policies, actions and targets related to impacts of pollution and climate are addressed other topical standards (i.e., E2 and E1 respectively). Other topics related to biodiversity are not considered material (e.g., social consequences of biodiversity and ecosystems-related impacts; freshwater -use change and sea-use change; direct exploitation; invasive alien species; impacts on the state of species). No material dependency, risks or opportunity have been found in relation to biodiversity and ecosystems, therefore disclosures related to implications for MOL Group's strategy and business model are not considered material. Besides the policies and actions plans described in chapter E4 of this report, MOL Group has not published a comprehensive transition plan related to biodiversity and ecosystems, or set any public Group-level targets. MOL Group has not used any biodiversity offset mechanism is 2024.
Energy data	E1-5 E1-6_18-23	Reported renewable energy consumption and production on MOL Group-level has remained low, below 0.5%. Disclosed values are not inclusive energy management is managed locally by relevant entities. Development of a Group level approach – including data collection on small-scale renewable energy production (e.g., solar panels installed at office buildings and service stations) and incorporating contractual power purchase agreements with certified emission factors is currently under development. Consumption of energy from nuclear sources and coal is not reported, as MOL Group does not use these energy sources directly. Electricity purchased from utilities is classified as fossil-based, as the actual energy mix cannot be reliably accounted for at the Group level.
Data on resource inflows and outflows	E5-4_02 E5-4_03 E5-4_04 E5-4_05 E5-5_02 E5-5_03 E5-5_04 E5-5_05	MOL Group's main products are refined petroleum products and petrochemical products mainly to wholesale consumers – therefore disclosures related to the durability, reparability and recyclability are not material disclosures. For information on secondary material use, please refer to disclosures on Waste-based fuel usage and production (OP-08).

DISCLOSURES ON SOCIAL STANDARDS

WORKFORCE

/S1/

INTRODUCTION

In our 2024 double materiality assessment, we identified the following impacts and risks related to workforce:

- Secure employment on fair terms (IM-12)
- Training and skills development (IM-14)
- Work-related injuries and road accidents (IM-13)
- Operations in areas with low security (IM-19)
- Corporate culture (IM-11)
- Labour market risks - Employee attraction & retention capabilities (RK-07)
- Personal injury risk due to system integrity failure or accidents (RK-04)
- Exposure to security threats (RK-09)

Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report. We concluded the topic 'Own workforce' to be material from both impact and financial perspective. We have identified one impact which is specific to the topic 'Worker in the value chain': Human rights & labour practices in the value chain (IM-15). MOL Group exposure to the risk of incidents of human rights abuse, forced labour, child labour, modern slavery and human trafficking is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to lawful and fair employment and to respecting labour principles, and expects the same from business partners and external stakeholders via contractual arrangements described in the Business Partner Code of Ethics and other policies - as described throughout this chapter. MOL Group will not tolerate any form of forced, compulsory, bonded or child labour or any other kind of unethical employment practice such as withholding wages, denying sick leave or daily rest, abuse of alternative employment forms or evasion of health care contributions. We ensure that these forms of labour and slavery, servitude, and human trafficking do not take place within our business and supply chains.

Since value chain related information is currently in phase-in period under ESRS reporting, limited information is disclosed in this regard in 2024. Currently MOL Group is working on developing its methodology on supply chain due diligence to comply with upcoming requirements under the Hungarian Act CVIII of 2023 ("ESG Law") applicable from 2025, and the Corporate Sustainability Due Diligence Directive.

Impacts and risks related to workforce can be categorized into 3 interconnected, yet distinct groups. This also means that the management of these IRO groups require different approaches and expertise, therefore generally handled is separate policies and actions, and measured and monitored by different progress metrics. This chapter is divided into the following 3 sub-chapters with the aim to describe how MOL Group manages the listed IROs, outlining specificities of each group:

Sub-chapter A focuses on the impacts on the company's employees, such as wages & hiring (IM-12), trainings and skills development (IM-14); and risks related to human resource management, such as employee attraction & retention capabilities (RK-07). This sub-chapter is generally focused on MOL Group's employees – in line with ESRS definition – i.e. individuals in an employment relationship with MOL Group according to laws. Albeit our internal policies and the presented data and analysis only apply to those individuals, we acknowledge that other groups of workers such an non-employees (individual contractors and agency workers supplying labor to the company) or value chain workers are also impacted by our operations. As stated in MOL Group's HSE and Social Impact Policy and in the Code of Ethics and Business Conduct, we strive to consider business, social, environmental, health, physical and emotional consequences of actions and committed to accomplish business objectives in a manner that causes the least harm and the greatest positive good not only for own employees but also workers in our value chain, in our communities and in society at large.

Sub-chapter B describes how impacts and risks related to the health and safety of workers are assessed and mitigated (IM-13, IM-19, RK-04, RK-09). MOL Group has comprehensive Group-level management system to cover occupational health and safety both for workers who are in an employment relationship with one of its companies – hereinafter referred to as own staff – and workers supplying labour to the Group via individual contracts or through employment placement agencies - hereinafter referred to as contractors. Both own staff and contractors are covered within MOL Group's relevant policies, and included in our data collection. Any individual falling out of the scope of own staff and contractors are considered as 'third party' in our reporting practices. Individuals described as "value chain workers" by ESRS - who aren't considered neither own staff or contractors are not allowed to conduct any work in our sites, therefore they are not covered by MOL Group's occupational health and safety policies. Occasional visitors at our sites receive the necessary induction on safety rules, must be accompanied and receive any personal protection equipment if necessary – however, this chapter focuses on occupation health and safety, therefore safety aspects of any third-party individuals are not covered here.

Sub-chapter C highlights corporate culture and ethical aspects (IM-11), focusing on diversity, equal pay for equal value, inclusion and measures against unethical behaviour. MOL Group has implemented a range of binding policies to ensure that ethical standards are upheld and integrated into our everyday operations – including but not limited to human resource management. MOL Group also expects all of its stakeholders in its value chain to respect and have measures to assure compliance with these values.

Each sub-chapter starts by providing a detailed description of IROs relevant for the topic, then details of the policies, actions, targets and metrics on outlining how these IROs are managed by MOL Group.

SUB-CHAPTER A: HUMAN RESOURCE MANAGEMENT

IDENTIFIED IMPACTS AND RISKS RELATED TO HUMAN RESOURCE MANAGEMENT

/S1. IRO-1, S2. SBM-3/

ESRS	Disclosure Requirement related to ESRS 2 SBM-3, S1.IRO-1:
GRI	GRI 3, 3-3

MOL Group's double materiality assessment conducted in 2024 included the identification of impacts, risks and opportunities related to workers. The general methodology and consultation process are detailed in section ESRS 2 IRO-1 of this report. Identification of actual and potential impacts on and risk associated with our own employees, which are discussed in this chapter, is conducted by continuously collecting feedback from our workforce and regular engagement surveys. Please refer to the "HR Advisory" paragraph of the S1-A-1&2&3 section of this chapter for more information.

IROs related to human resources described in Table IM-12, IM-14, and RK-7 below:

Table IM-12: Secure employment on fair terms

Severity	Significant
Scope	CEE
Likelihood	Actual impact
Description	MOL Group is a key employer in the Central-Eastern European region. It provides stable employment to around 25,000 people in its own workforce, and indirectly to many contractors and others via its value chain. Besides this positive effect, in case of potential negative business performance of the Group, spill-over effect might not only impact own employees adversely, but also the local job markets due to the Group's high share in employment.
Mitigation actions & remendability	Besides regularly engaging directly with its own employees and monitoring satisfaction, the company actively engages in collective agreements and collaborates with trade unions to ensure fair employment practices. For details on policies, processes and key actions see DR S1-1, S1-2, S1-3, S1-4.
Time horizons	We consider the topic material on all time horizons.
Relevance in the value chain	Secure employment on fair terms is a material impact across all levels of MOL Group's value chain.

Table IM-14: Training and skills development

Severity	Moderate
Scope	CEE
Likelihood	Actual impact
Description	MOL Group is dedicated to investing in human capital via trainings and skills development programmes, emphasizing the importance of professional development, health, safety, well-being, and corporate ethics. MOL Group prioritizes hiring new entrants to the job market and recently graduated professionals. Through these initiatives, the company positively impacts human capital development and contributes to the availability of a trained and educated workforce in the region.
Mitigation actions & remendability	To support its commitment, the company offers a variety of training and development programs for its employees and contractors. In total, over 709 thousand hours of training were recorded in 2024, and USD 7.5 million euros were allocated for trainings and skills development. Additionally, the company collaborates with and funds institutions that provide vocational training and education programs. The company also provides apprenticeships, internships, graduate programs, and career orientation and pre-recruitment programs. For details on policies, processes and key actions see DR S1-1, S1-2, S1-3, S1-4.
Time horizons	We consider the topic material on all time horizons.
Relevance in the value chain	Training and skills development is material impact across all levels of MOL Group's value chain.

Table RK-07: Labour market risks - Employee attraction & retention capabilities

Type	Operational risk
Likelihood	High
Magnitude of financial effect	Medium
Description	Attracting and retaining a capable and diverse workforce to ensure the operation of its complex activities is a constant challenge for the company. Key risks in the labour market currently include high turnover and increasing wage pressure due to the current macro environment, aging population, and the availability of trained personnel in the market. This is especially critical for new and highly knowledge-intensive business lines requiring different capabilities and rapid upskilling/reskilling.
Related impact & dependencies	**Impacts:** MOL Group, as a key employer in the CEE region, has significant impacts on not only on its own workforce, but also workers in its value chain. Identified impacts related not only to providing employment (IM-12), but also to the development skills & capabilities of workers (IM-14) and working towards sustaining favourable working conditions (IM-11). **Dependencies:** Its approximately 25,000 workers is a key asset to MOL Group. The company is dependent on having sufficient number of employees with suitable skillset to ensure smooth operations.
Mitigation actions	Actions related to this impact (see IM-11, 13 & 15) are all important factors in strengthening employee attraction, retention and upskilling capabilities thus reducing risks stemming from the labour market. For details on policies, processes and key actions see DRs S1-1, S1-2, S1-3, S1-4.
Financial effect & time horizons	In 2023, the total employee benefits paid was over 870 million euros, thus we consider the topic *own workforce* financially material. Due to the aforementioned labour market trends (increasing wage pressure, aging population, fluctuation), we consider this a long-term risk.
Relevance in the value chain	Labour market risk is a material risk across all levels of MOL Group's value chain.

POLICIES & ENGAGEMENT RELATED TO OWN WORKFORCE

/S1-1; S1-2/

ESRS	Disclosure Requirement S1-1,S1-2
GRI	GRI 2, 2-12 GRI 2, 2-23 GRI 2, 2-25 GRI 2, 2-26 GRI 2, 2-29 GRI 3, 3-3 GRI 403, 403-2

To manage material impacts, risks, and opportunities related to the workforce, including specific groups within the workforce or the entire workforce, MOL Group has several policies and strategies in place. The key pillars of the updated **Group level People Strategy** which was presented to the MOL Group top management and Supervisory Board members in June 2024 - are:

- **Refine:** Refining & Digitalising HR processes and enhancing the ONE HR database
- **Attract:** Make MOL Group one of the most desired employers
- **Engage:** Ensuring employees know what we offer, cultivating talent and building a culture which retains our key people
- **Develop:** Helping our leaders grow, empowering our experts & blue collars to grow, paying special attention to talent
- **Build:** Strengthening the collaboration within the ONE HR community

These key principles are integrated into MOL Group's process-based policies. The aim of policies is to define the mandatory elements and steps in change management processes, risk assessments, and mitigation measures. The Group also focuses on attraction, retention, and development of people, whilst also ensuring the availability of workforce in sufficient quality and amount to enable the continuity and development of our business operations by mitigating labour market risks (RK-07).

The **Human Resources Area Book** is the highest level process-based policy in the field of Human Resources defining main HR processes, rules and requirements and strategic goals to ensure top quality HR services across the MOL Group, compliant with local legal and market requirements. The provisions of this policy are obligatory and binding for affected employees. The implementation – via incorporating them into local / entity specific policies (e.g. applicable specific subsidiaries), or topic specific process descriptions (e.g. recruitment & selection, renumeration, or talent management rules) is the common responsibility of the Group HR Senior Vice President, local CEOs and local HR Managers. To ensure affected stakeholders' awareness, MOL Group has mandatory trainings covering all key areas, whilst relevant policies are available to all employees on MOL Group's E-REG system. Human Resources Area Book describes the 6 core processes which must be implemented at all MOL Group companies (i.e. MOL Plc. and controlled operative subsidiaries involved into matrix operation):

1. Employee Attraction, Recruitment, and Selection

MOL Group focuses on building a robust talent pipeline to achieve its long-term strategic goals. Through strong relationships with educational institutions and strategic workforce planning, the company ensures a steady influx of skilled employees, particularly young talent, to meet mid- and long-term business needs. This directly addresses the challenge of labour market risks (RK-07) by strengthening MOL Group's ability to attract and retain a capable and diverse workforce, which is critical for maintaining operational excellence and adapting to rapidly evolving business demands; whilst has a positive social-economic impact by providing employment opportunities and helping the entry of young people into job market. (IM-12)

2. Reward and Benefits

To ensure secure employment on fair terms, MOL Group's remuneration structure is based on transparent principles of internal equity and external competitiveness. Job positions are evaluated using the Hay methodology and pay scales are benchmarked against international market standards. Employee benefits are designed to enhance physical, mental, social, and financial well-being, fostering engagement and retention. By aligning compensation and benefits with market trends and business strategy, MOL Group ensures fair and stable employment (IM-12) while attracting top talent (RK-07) in a competitive environment.

3. Learning and Development

MOL Group invests in continuous leadership, professional, and technical capability development for its employees. Training opportunities are tailored to meet individual and organizational needs through various methods, including classroom sessions, e-learning, mentoring, and coaching. Managers are encouraged to actively support employees' professional growth, ensuring alignment with business goals. By prioritizing skills development and professional advancement, MOL Group contributes to regional human capital development and secures a well-trained workforce capable of driving innovation and operational success (IM-14).

4. Workforce and Employment Management

Employment contracts are prepared in compliance with local legislation, guaranteeing clear terms and stable working conditions, and secure and fair employment terms for all employees. Flexible work arrangements are offered wherever feasible, supporting a balance between business requirements and employee well-being (IM-12).

5. HR Advisory

HR advisory processes focus on fostering an inclusive, ethical, and transparent workplace culture. MOL Group supports social dialogue through regular engagement with trade unions and workers' representatives; and by regularly monitoring employee satisfaction.

Work representatives in MOL Group play a crucial role in maintaining a harmonious and productive work environment. They act as a bridge between the employees and the management, ensuring that the concerns and suggestions of the workforce are heard and addressed. MOL Group supports fair treatment practices such as guaranteeing diversity, ensuring fair and equal remuneration and supporting freedom of association by partnering with trade unions and work councils that are active across the Group and engage the majority of the Group's employees. On Group-level all employees are represented by the European Works Council (EWC). The Council was re-elected in 2023 for a five-year mandate. European Work Council organizes a Senior Management Forum twice a year, where senior managers give updates regarding the actualities and the committee members ask their questions relevant & collected from the countries. Furthermore, trade unions are present in the following MOL Group countries: Hungary, Croatia, Slovakia, Bosnia and Herzegovina, Poland, Romania, Montenegro and Russia.

Besides engaging with worker's representatives, MOL Group also conducts direct assessment of the wellbeing and employee engagement via regular people surveys and pulse checks. Upon survey results, focus areas must be defined, and action plans shall be developed at company, business segment, and unit level to address critical areas. Furthermore, the company is also committed to provide financial support to individual workers facing unexpected challenges – for instance, via the Social Fund in MOL Hungary. The allocation of this fund is determined by the trade union.

MOL Group Employee Engagement Survey is launched every two years where they can monitor the engagement level of the workforce. Regarding the process, an external vendor, hired by Group Human Resources, provides the questionnaire based on previous years' questions and actualities which is preshared with business representatives and top management for review before the launch of the survey. After survey takes place in an external, online platform, MOL Group level results are presented for top management and the set directions and expectations are cascaded down.Besides the biennially launched survey, pulse check is available for the organizations to monitor the engagement and mood for their employees.

Besides the general process of Employee Engagement Survey and its action, other MOL Group HR processes are aiming for indirectly impact and increase engagement as well. These processes are regulated internally in the **Talent Management Process Description** - approved by the Head of Group Capability Development & Strategic HR, and applicable on the same scope as the **Human Resources Area Book**. The aim of this document is to ensure the strategic objective to increase overall company engagement by defining clear rules and processes to be followed. One of the key enablers are recognition and stay interviews: Recognition is one of the most important drivers of great work which helps to retain top Talent, enhance employee engagement and encourage performance. Recognizing Talents gives them positive reinforcement that their efforts are appreciated and valued. Furthermore, Stay Interviews are regularly conducted with a focus on understanding the Talent's drivers of staying with the company and triggers of leaving. Following up on these two angles of their engagement to the company provides arguments for improving our Talent retention strategy.

6. HR Process Design and Control

Two way communication is essential for HR processes to remain efficient, transparent, and responsive to organizational needs. Therefore, employees are encouraged to propose new ideas and improvements via multiple channels fostering an innovative HR environment. The flagship forum to ask questions from management, raise concern or propose ideas are the regular Townhall events within MOL Group divisions.

In case an employee's concerns are not addressed on local level or via public channels, they are encouraged to use the Group-level SpeakUp! mechanism accessible for all internal and external stakeholders for advice or to raise concerns ("whistle-blowing"). Reports can be made anonymously and will be treated as confidential, without risk of reprisal. For further details, please refer to Section S1-C-1&2&3 of this report.

ACTIONS RELATED TO HUMAN RESOURCES

/S1-4/

ESRS	Disclosure Requirement S1-4
GRI	GRI 3, 3-3, d GRI 403-9 GRI 403-10

On the back of rapid changes and long-term structural trends affecting labour markets as well as our industry and company transformation ahead, talent attraction and development programs are essential in order to ensure not only the necessary skills and competencies to execute the business strategy, but to continue building a strong employee pipeline whilst ensuring inter-generational knowledge sharing due to aging and retiring workforce in the core regions where MOL Group operates (RK-07).

Within talent management framework the focus is to support our leaders attract and identify, develop, retain and promote MOL Group Talents through impactful and efficient process and by using unified Talent Management language and terminology. Last year 1871 colleagues were identified as talents out of which 281 people are in senior expert or managerial roles, these numbers show similar trend compared to previous years. Talent MNG HUB, a platform serves as a one stop shop for MOL Group Leaders to educate themselves with short e-learning videos and materials, has been visited by 949 unique visitors, with 235 test completions with 70% success rate in period December 2023-February 2024. Overall, 58 People and Talent occasions have been organized as discussion platforms of MOL Group people and talents. We have registered 220 Stay interviews, which have confirmed the results from 2024 in terms of main drivers of key people and talents staying in the organization and triggers for leaving the organization. Based on career focus discussion 40% of survey sample showed the ambition to transition to a new role, both short and long term.

When it comes to talent development, there are many available solutions within MOL Group, e.g. mentoring, coaching, leadership and professional expert development program. Last year retention/engagement toolbox was rolled out in Hungary in order to further upskill our leaders of increasing talent retention efficiency and also handling well moments that matter. Over 250 managers participated at 7 live managerial workshops in MOL Campus (Budapest), the Százhalombatta Refinery, MOL Petrochemicals (Tiszaújváros). During the last 3 months, 180 colleagues visited the Retention toolkit pages.

MOL Group's premium leadership development program is LEAD, where the focus was on the ongoing LEAD2024 streams last year, including a newly introduced LEAD Transformational stream. Further emphasize was put on LEAD Alumni network, LEAD Alumni Conference will be organized for the 3rd time in Q1 2025.

In 2024, 92 fresh graduates from 8 countries were hired within Growww framework, reaching 48% female ratio.

In Hungary, Secondary school technical education stayed in focus – new classes started in Százhalombatta (SziSzKI), 4 MOL classes were created with our financial support in 2024. We had 191 dual high school students, out of which 46 finished their school, 43 dual engineers where the retention rate is 90% (meaning 90% of students stayed within MOL after completing their studies). More than 120 MOL colleagues are dedicated to share their knowledge and attract young talents by teaching at universities.

In Croatia, INA collaborated with 15 faculties and 2 student associations, 5 technical and 1 catering school. Regarding internship, 20 pupils took part in dual internship, 34 students on regular internship, 6 students started their internship on our gas stations, 8 lectures organised by INA Group experts on faculties.

In Slovakia, Slovnaft collaborated with 3 technologically focused secondary schools. A Memorandum of cooperation with two new schools was signed last year. Students have different practical trainings on site of the company, especially in the newly established training center in VURUP laboratories. Training center is utilized also for a new operators' theoretical education. In school year 24/25 we have 17 students included in the practical education.

MOL Group's reputation as a leading regional employer was further strengthened through recognition from more than 25 global and local external awards.

Besides efforts to continue building a strong employee pipeline to mitigate human resource related risks, MOL Group focuses on enhancing positive impacts, and preventing and mitigating negative impacts on workers' well-being. In recognition that regular assessments and data-driven measurements are key enablers of appropriate response and effective actions, employee engagement survey has been conducted in 2024 with the fulfilment rate between 92-95% of 40,000 employees in scope (MOL Group's 25,000 employees the addition 15,000 includes Retail colleagues with separately dedicated survey). Altogether 759 actions were registered to increase employee engagement. As centrally driven action of Employee Engagement Survey result, Group Business induction training extended for all interested audience in HU and ENG languages was piloted and successfully conducted in Q4.

MOL Group supports fair treatment practices such as ensuring fair and equal remuneration and supporting freedom of association. MOL Group partners with trade unions and work councils that are active across the Group and engage the majority of the Group's employees. (IM-12)

On Group-level all employees are represented by the European Works Council (EWC). The Council was re-elected in 2023 for a five-year mandate. Its Executive Committee (EC) meets on a quarterly basis to discuss employment and operational related issues. The EWC held two ordinary meetings in 2024 with the participation of the MOL Group senior management. In 2024, the percentage of employees covered by collective agreements remained high at 90.3%. Trade Unions are active at the majority of MOL Group companies employing the 96.7% of the total headcount. Relevant laws concerning collective agreements differ on a country-by-country basis, but the majority of MOL Group companies are covered by collective agreements. Focus of the held negotiations was ensuring higher income for operational and expert employees, either through increases of base salary or through increase of different material rights, with optimum distribution of the available budget through utilization of any non-taxable opportunities on local markets. Trade unions and MOL Group company representatives continued close cooperation and through positive social dialogue defined ways of working which are supporting business continuity and ensuring successful and stable operations. In 2024 we have continued focusing on further digitalization of our processes in order to ensure that any unnecessary operational work is avoided and we increase the efficiency of our operations. Given that MOL Group is diverse and covers multiple locations, our focus in 2024 in terms of digitalization efforts was on harmonizing different local databases and creating a set of clear and standardized HR KPI's. In parallel with that, with the support of IT team, HR Technology team started to define the processes and ways where Artificial Intelligence can be used to support further streamlining and simplification of workflows, with the several specific projects in focus of "AI for HR" stream (creation of HR chatbot, use of AI in recruitment, etc.).

MOL Group continues to keep focus on its employee wellbeing strategy and ensuring that all employees can fulfil themselves in every aspect of their life and achieve a healthy work-life balance. Through internal and external channels, continuous communication campaign towards employees is organized in order to ensure that they are informed on all available benefits, including health – both physical and mental, parental support, financial benefits, and professional development opportunities. MOL Group is specially focused on health of our employees and through the benefit platform we ensure life, accident and travel insurance for each MOL Group employee. Additionally, on 3 core markets (Hungary, Croatia and Slovakia) which are covering ~80% of total employee population, as well as in most other MOL Group companies, we are ensuring additional healthcare benefits for our employees such as providing private health coverage and regular annual medical check-ups. Focus of the Group's wellbeing strategy also remained on ensuring the high level of maternity/paternity entitlements for employees (with a note that maternity/paternity practices and benefits differ among member companies across the Group since they are defined in compliance with local rules and local practices). With number of different benefits supporting the parents in their care for children, MOL Group is investing efforts in maintaining the status of 'family friendly employer'. Also as part of the wellbeing strategy, MOL Group companies continued enabling their employees to use the possibility of remote work in line with an updated rules introduced from 2024.

Recognising the positive effect of skills development and continuous learning on both the employees and the organisations success, MOL Group put great emphasis and allocated significant resources on training and development activities in 2024 (IM-14).

MOL Group Academy (MGA), continued to operate in progressing trend as the key internal knowledge hub for all MOL Group employees. This internal academy platform, presents digital learning opportunities for actual business, professional, soft skills and leadership development in the form of E-learning materials, pre-recorded training sessions, internal trainings and workshops etc. Within MOL Group Academy Framework, 69 trainings were organized, covering 40 topics for 1894 participants in total 6343 completed learning hours. Accelerated focus on Strategy Shape Tomorrow and the raised need for upskilling/reskilling resulted in 13.3% increase in average training hours per employee (34 in 2024 vs 30 in 2023) followed with 9% increase in average training costs which shows a moderate increase trend having in mind average training vendor cost increase in 2024, which was around 15%. In 2024, based on the changing requirements of the leadership, the Technical Competence and Career Development Program within E&P discontinued their assessments with the PetroSkills system and got started with the program revamp. During this period of revamp while the new system and methodology was being developed, the E&P colleagues continued to focus on their development plans made on the basis of the previous evaluation cycle helping them overcome the already identified competency gap areas. The Growing Professional Skills Program within DS area, on the other hand, followed through with the assessment cycle launched in Q3 2023 with multiple calibration sessions conducted with the business regarding the identified gaps followed by individual development planning and training executions. Within MOL Group around 2,600 white collar colleagues are enrolled in the TCCD/GPS program, covering 12 countries, and involving in the program more than 400 Subject Matter Expert, Managers and Cross-assessors.

In 2024, a Customer Service Protocol was fully implemented in every sales and marketing campaign to ensure a standardized approach to serving customers, with the primary goal of increasing gastro product sales. The results showed improvement through the introduction of monthly focus items, which effectively boosted customer engagement and sales performance. For 2025, main goal is to focus on supporting Partners to overcome any obstacles they face with the Hosts and help them achieve desired sales results and perform operation proficiency. For this purpose, Captain-on Board project is designed, which emphasizes onboarding new Partners and retraining existing ones with tailored soft skills training, designed based on research into their specific challenges.

In 2024, we had 6,295 active learners in LEON "Learn online" among blue-collars, who used the microlearning platform in an average of 182 days during the year. The companies in MOL Hungary using LEON: DS: 1150 users; MPK: 1150; Petrolszolg: 950; Logistics: 850; Upstream: 800; MOL LUB: 300; MOLTrans: 300; FER: 250; Geoinform: 200. INA Logistics joined LEON with: 350 licences as a pilot outside of MOL Hungary. Not less than 17 net hours were spent on average with different learning-activities in LEON, focusing mostly on HSE-related contents. The general knowledge-growth achieved 15%, which clearly indicates how much the safety awareness increased within the company. The satisfaction-rate among LEON users reaches 75%, while a third of the responders is highly satisfied with the tool.

After two years from enrolment of digital learning library concept, LinkedIn Learning in 2024 we have enrolled cca. 1600 employees across MOL Group with a learning license. Digital learning behaviours and patterns of our employees showed a positive trend of spending on average 1.2h monthly and watching 25 videos monthly per user on average using the tool which we find cost and time efficient and supporting the overall wellbeing of the employees by having the access to knowledge when most suitable for them to consume it. Major content learned over off-the-shelf digital learning was Artificial Intelligence for business, Microsoft Excel, Project Management and Leadership. MOL Group continued to focus on leadership development to support Group leaders in executing the business strategy. In cooperation with SEED (School for Executive Education & Development) and Cotrugli Business Schools, the sixth generation of LEAD2024, a one-year long Group- level leadership development program has been successfully rolled out for three leadership streams engaging 50 leaders. 2 colleagues started and 7 other completed their Corvinus-MSM SEED Executive MBA in 2024, and 11 started and 10 completed their Cotrugli MBA. Further 42 talents participated in different SEED leadership development courses. In 2024 we have continued with the Leader of Leaders Program in Hungary with 31 participants; also, we continued the First Time Leader Program in all core countries and on Group level, with total 129 participants. As integral part of the Group's leadership development portfolio, the Intensity modular development courses were attended by 119 colleagues in 2024. In addition, we have rolled out 8-month long Downstream Leadership Succession Program in all core markers participated by 57 colleagues, preparing them to step up into senior leadership role. Following successful start of the program at MOL and INA in 2023, Slovnaft identified 28 expert talents who joined the expert talents development journey Future@Slovnaft and MOL and INA continued with a second generation of the Future program with 175 participants in total in 2024.

Beside the above mentioned actions, MOL Group implemented several action related to diversity and inclusion. Find more details in Sub-chapter C of this chapter, in the 'Actions related to diversity and inclusion' section.

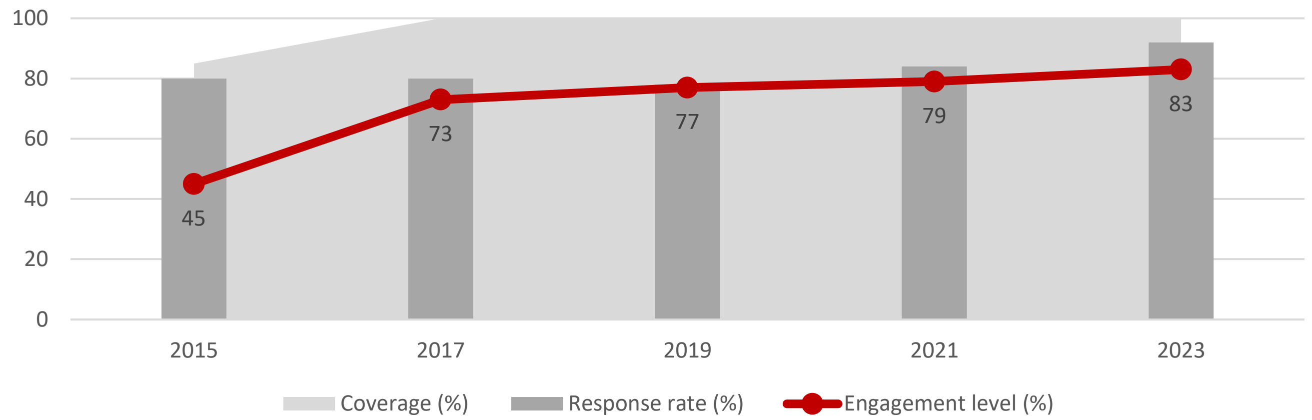
TARGETS RELATED TO HUMAN RESOURCES

/S1-5/

ESRS	Disclosure Requirement S1-5
GRI	GRI 3, 3-3

MOL Group' primary target in the field of human resources is to keep **sustainable employee engagement** level at minimum 75% at all times. As described in the Policies section of this chapter, Employee Engagement Survey is a biennial exercise where all MOL Group employees are asked to rate their satisfaction with their work experience at the company alongside various aspects. The target is met, if at least 75% of the employees select favourable ratings (typically the top 2 options from 5) for a set of key questions during this survey. The results are always assessed against international industry benchmarks as well. Since 2015, the following results have been measured:

Table: Sustainable Employee Engagement levels



METRICS RELATED TO COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

/S1-8/

Freedom of association /S1-8_04/	UNIT OF MEASURE	2024	2023	ESRS
Employees with potential coverage of collective bargaining agreements	%	90.3	92.8	S1-8_05
o/w Croatia	%	100.0	-	S1-8_05
o/w Hungary	%	85.2	-	S1-8_05
o/w Slovakia	%	100.0	-	S1-8_05
o/w Other EEA	%	74.0	-	S1-8_05
o/w Non-EEA	%	0.0	-	S1-8_06

90.3% of employees are covered by collective bargaining agreement. In the EEA, collective bargaining agreements are per company, and coverage is for all employees in the company.

Social dialogue /S1-8_04/	UNIT OF MEASURE	2024	2023	ESRS
Employees covered by workers' representatives	%	96.7	-	S1-8_05
o/w Croatia	%	100.0	-	S1-8_05
o/w Hungary	%	98.9	-	S1-8_05
o/w Slovakia	%	100.0	-	S1-8_05

96.7% of employees are covered by worker's representatives as per the above breakdown. This is based on trade-union coverage. Employees at MOL Group are also represented by an European Works Council (EWC).

ADEQUATE WAGES

/S1-10/

MOL Group pays an adequate wage to all its employees. Employees are paid above the minimum wage in all jurisdictions where such legislation is applied, and where there is no minimum wage requirement, employees are paid above the wage level needed for a decent standard of living.

SUB-CHAPTER B: WORKER HEALTH AND SAFETY MANAGEMENT

IDENTIFIED IMPACTS AND RISKS RELATED TO OCCUPATION HEALTH & SAFETY

/S1. IRO-1; S1.SBM-3/

ESRS	Disclosure Requirement related to ESRS 2 SBM-3, S1-IRO-1
GRI	GRI 3, 3-3

MOL Group has comprehensive Group-level HSE MS to cover – besides all other aspects of Health, Safety and Environment – occupational health and safety both for workers who are in an employment relationship with one if its member companies – hereinafter referred to as own staff – and workers of companies or any individuals engaged by a MOL Group Company to carry out specified work – hereinafter referred to as contractors. The latter are typically operational/construction contractors (companies providing operational or project-oriented type works such as maintenance, construction, demolition, rearrangement, equipment installation etc.), vendors on premises (contractors providing definable activities such as shipping operations, food services, medical services, manufacturing, drilling etc.) and service contractors (companies performing installation and maintenance services). This definition includes all levels of subsequent subcontractors. All contractors that provide workers and tools for the execution of the work are under the supervision and instruction of HSE MS of the MOL Group. Therefore, both own staff and contractors are covered within MOL Group's relevant policies and included in our data. Any individual falling out of the scope defined as own staff and contractors are considered as 'third party' in our reporting practices. Individuals described as "value chain workers" by ESRS – who aren't considered neither own staff, or contractors are not allowed to conduct any work in our sites, therefore they are not covered by MOL Group's occupational health and safety policies. Occasional visitors at our sites receive the necessary induction on safety rules, in general must be accompanied and receive the relevant personal protection equipment if necessary – however, this chapter focuses on occupation health and safety, therefore safety aspects of any third-party individuals are not covered here.

During MOL Group's double materiality assessment conducted in 2024, we have examined the health and safety of workers aspect with distinct attention within the *S1 – Own workforce* topic since our earlier assessment identified it as one of the top priorities. Therefore, we have found it worthwhile to dedicate a separate section within our report for this topic. Whilst the general methodology and consultation process related to the double materiality assessment is outlined in section ESRS 2 IRO-1, MOL Group's processes for the identification of impacts and risks related to the health and safety of workers is described in the *Element 2: Risk & Change Management*, and in *Element 6: Operational and occupational safety* of the HSE MS (For details, please refer to Section E1.IRO-1 of this report). These documents outline MOL Group's approach and processes to identify potential impacts on workers' safety through comprehensive programs that assess operational and maintenance activities, identify safety-critical tasks and equipment, and evaluate risks related to hazardous energy (e.g. electrical, mechanical, hydraulic, pneumatic, chemical, thermal, etc.) and health exposures. Permit-to-work processes and deficiency tracking systems further support the identification of risks before tasks are executed.

IROs related to workers' health and safety described in Table IM-13, IM-19, RK-04 and RK-09 below:

Table IM-13: Work-related injuries and road accidents

Severity	Significant, potentially irremediable negative impact
Scope	Local (in potentially territorial)
Likelihood	Medium likelihood
Description	MOL Group's main activities are related to the oil, gas and petrochemical industry, representing special personal and process safety risks of safety events, injuries or traffic accidents. The aim is to identify and manage these risks at operational sites, including their maintenance, and during hazardous material transportation (including in its value chain) with high-standard stringent safety regulations and protocols on work safety, health protection, fire protection and process safety. Besides some other rare factors, the most common causes of injuries regularly are the slips&trips; cuts & pinches on hand; road accidents; minor splashes of hot or hazardous materials; injuries caused by equipment.
Mitigation actions & remendability	MOL Group has a remarkable Health, Safety and Environmental Management System (HSE MS), derived of which strict health & safety protocols are applied in place, which are regulated not only on Group-level, but with additional, locally tailored, detailed regulations as well. These include safety rules, mandatory trainings, annual HSE programs and action plans and many more, ensuring an overall Group level compliance with Group HSE framework and in parallel full local legal compliance as well. Regulations and programs do not only cover own employees but contractors too. Since in many cases effects of injuries at the affected person could even be not remediable, preventing incidents is a strong priority.
Time horizons	We consider the matter to be material at all time horizons, with the aim of reducing the incidence rate and severity of incidents to the lowest possible level.
Relevance in the value chain	Work-related injuries could be material impact of MOL Group's industrial operations, including the Upstream, Refining, Petrochemical, Gas Midstream and in the Consumer Services business segments.

IM-19: Operations in areas with low security

Severity	Significant negative impact
Scope	Local
Likelihood	Low likelihood
Description	MOL Group has operations in areas with low security (crime, potential of armed conflict, terrorist attacks, piracy), thereby staff and contractors could face the potential threat of violence, or accidents/incidents due to damage on the facilities.
Mitigation actions & remendability	Reduce risk include implementing security measures such as maintaining a presence of local security equipment, processes and staff. To decrease the risk of targeting, the security staff's uniforms have been changed to civilian attire. The scale of potential impact is considered significant due to potential irremediability of serious cases.
Time horizons	We consider the issue material on all time horizons, with the aim of reducing the possibility of incidents to the lowest possible level.

Relevance in the value chain	Operations in areas with low security is material impact of MOL Group’s Upstream operations.

Table RK-04: Personal injury risk due to system integrity failure or accidents

Type	Operational and physical risk
Likelihood	Medium
Magnitude of financial effect	Medium
Description	Industrial activities in which MOL Group is engaged are exposed to the risk of Process Safety Events due to the potential loss of mechanical integrity, technical, technological or operational issues, natural disasters or human errors.
Related impact & dependencies	Potential incidents might cause environmental damage (products spills, leakage of hazardous substances – see IM-04) and personal injuries (see IM-13). Spills are reported in DR E2-4, whilst information on safety incidents is reported under DR S1-14.
Mitigation actions	To reduce the likelihood and mitigate severity of incident due to Process Safety Events, MOL Group regulates the area on Group, on Group business and on local levels as well, prioritises rigorous maintenance, timely asset replacement, and adherence to strict safety protocols – refer to DR E2-1, DR E2-2 and DR S1-3, DR S1-4 for related policies & actions.
Financial effect & time horizons	The consequences of aforementioned potential events can materialise as expenses for the company in the form of remediation costs, or in extreme cases, fines. Financial consequences of incident on workers health cannot be quantified – MOL Group's approach is to prevent such events by having strict health & safety protocols in place, which are regulated both on Group-level with additional, locally tailored regulations. This includes safety rules, mandatory trainings, annual HSE programs and action plans. Please refer to DR S1-4 for actions and relevant actions. Cost of these prevention actions is considered financially material based on historic spendings. Please refer to DR S1-4 for relevant actions. The number and severity of the aforementioned incidents and process safety events within a continuous approach aiming a decreasing long-term trend, slightly fluctuates year-by-year – see DR (number of spills, TIER events, injuries). Therefore, on the short term likelihood of occurrence and magnitude of financial effects is hard to be reliably estimated. On the long term, we expect the risk to be lower due to improving technology, more developed mitigation actions and phasing out of old assets.
Relevance in the value chain	Personal injury risk due to system integrity failure or accidents is a material risk across all levels of MOL Group's value chain.

RK-09: Exposure to security threats

Type	Physical risk
Likelihood	Low
Magnitude of financial effect	Medium
Description	MOL Group operates E&P assets in areas where exposure to criminality, social unrest, terrorism and acts of war is present, posing potential threat to employees and contractors.
Related impact & dependencies	Details on associated impact: *IM-19 - Operations in areas with low security*. MOL Group mitigates the risk of incidents by strict safety measures and with the presence of local security staff (changed from uniformed staff to decrease the risk of targeting)
Mitigation actions	
Financial effect & time horizons	Financial effect of the risk is not quantifiable, but the topic is considered material (medium) due to indirect financial effects such as reputational consequences.
Relevance in the value chain	Exposure to security threats is a material risk of MOL Group's Upstream operations.

POLICIES RELATED TO HEALTH, SAFETY AND SECURITY OF WORKERS

/S1-1; S1-2; S1-3/

ESRS	Disclosure Requirement S1-1, S1-2, S1-3
GRI	GRI 2, 2-12 GRI 2, 2-23 GRI 2, 2-29 GRI 3, 3-3 GRI 403, 403-1

The following section outlines MOL Group's policies for assessing and mitigating impacts and risks related to the health, safety and security of its workers, including incident prevention, engagement with workers and remedies for material negative impacts.

General policy commitments related to HSE are outlined in the Group HSE and Social Impact Policy and Health Safety and Environment Area Book. Whilst, as said above, specific process-based requirements related to Occupational Health & Safety (OHS) are outlined in different elements of the HSE MS. The provisions of HSE MS are mandatory and binding for all affected employees (own staff and contractors) for all types of operations and projects. The general processes and principles are listed below. In addition, detailed requirements are regulated in appendices of HSE MS and further process descriptions. The management system requirements (along with HSE legal compliance and regulatory requirements) are implemented through local regulations embedding HSE principles into operational activities. Given the integrated nature of the business, MOL Group is active in several industries though different businesses in different jurisdictions. As a result, in some cases, legislation requires to have some specific ISO/OHSAS related accredited certifications. A complete list is accessible on the following sites:

- MOL Plc. (Hungary): **Standard-based Management Systems**
- INA d.o.o (Croatia): **Certificates**
- Slovnaft a.s. (Slovakia): **Standard-based Management Systems**

Hazard identification, risk assessment, and incident investigation:

- Based on the hazards and risks that are identified, assessed and periodically (and if needed occasionally) reviewed, the appropriate risk assessment methodology must be applied by competent personnel. Risks and mitigation actions must be communicated to all affected parties. The risks of changes must be assessed and managed. All MOL Group-level and local-level Business Units/ Functional Units and legal entities must comply with local risk assessment legislation relevant to their activities (e.g., local SEVESO regulation, workplace risk assessment, etc.). All kinds of hazards and risks arising from the operation of any MOL Group Company must be identified, assessed, registered, controlled, and regularly reviewed to prevent or reduce the likelihood and consequence of incidents to as low level as reasonably practicable (ALARP). The following hierarchy of controls must be followed as far as it is reasonably practicable when defining risk mitigation measures:
  - elimination
  - substitution
  - engineering control
  - administrative control, and
  - adequate protection (e.g. collective or personal protective equipment).
- These processes in general follow the main group requirements but considering the very different legal obligations need to comply with local law. Accordingly, the competent personnel also fulfil both the group general and local legal requirements. Based on reviewed hazard identification, risk assessment and incident investigation results, the management system is continuously updated (at least bi-yearly by definition, but even more frequently – last update was released in January 2025) to ensure the continuous improvement, in parallel with industrial best practices. The updating starts from Group level, managed by the relevant professional area's experts and leaders, then it is followed by a wide, business and HSE professional commenting, to get the final consensus.
- In the case of HSE events, including near-miss cases, especially with high potential (HiPo) consequences, it is crucial to identify why and where things have gone wrong and how they can and must be corrected to prevent future recurrence, losses and interruptions to operations by improving the management system and organizational culture that allowed the incidents to occur in the first place. Based on HSE MS, Element 10: 'Incident management', all incidents must be reported, recorded and properly investigated, relevant preventive and corrective actions defined and implemented, finally all learnings communicated. All details of these steps are defined in the Appendix 8 (Detailed rules for Incident Management (Element 10). Thanks to this written rules workers are protected against any reprisals, furthermore, being promoted for reporting any events, near misses or even unsafe acts, unsafe conditions and safety rule violations.
- Element 10: Incident Management part of the HSE MS (used IT tool is the Enablon, like for the entire Group-level HSE data management) integrates immediate electronic reporting of incidents through emailing and the tool supporting a thorough incident investigation. For investigating serious incidents, we apply industry standard root-cause analysis methodologies (e.g. 'Tripod', or 'Bow Tie', etc.). Lessons learned are shared throughout the company in comprehensive summaries and photos as part of the HSE Alert system to increase the level of knowledge and awareness of all employees. We encourage all employees and contractors to report all HSE events, even the unsafe conditions and acts potentially leading to those. We are committed to share all information in a personalized way as much as possible.
- On the highest level in HSE MS, Element 3: Competence, Training & Behavior 7.c) we declare that „everyone understands their responsibility to "Stop and Intervene" and is motivated to apply Stop Work Authority during any activity in which risk is not adequately controlled or refuses to work in circumstances that may cause HSE harm. Additionally, according to the HSE MS appendix 6. B II. 2.2 Rights and responsibilities, 1.c) „Every employee has the right to have and use "Stop Work Authority" whenever real or potentially unsafe conditions or unsafe actions are identified". Additionally, the messages about our Life Saving Rules clearly state, that „All MOL Group employees and contractors should adhere to the safety rules, intervene and stop work if there is a doubt about safety, so everybody can return home safely after our working day!" as well as the aim „…to ensure you a license to say 'NO'…" Although these messages are explicitly stated in connection with Life Saving Rules, they are valid at each and every safety relevant aspect.

- Maximum 2 working days after an incident occurred or in other, duly justified cases the initial consequence classification must be reviewed and modified via Enablon so that electronic notifications can be sent out, if necessary. An Investigation Team must be nominated within 2 working days following the occurrence of an incident by the responsible person. Depth of investigation, selection of investigation method or involvement of specialists/experts (e.g., authorized fire safety experts) must be determined based on severity or nature of the incident. Incident investigations need to be able to satisfy relevant statutory legal requirements and to be usable in relation to potential insurance claims or litigation. Investigation Reports must be finalized as soon as possible, but within a maximum of 60 calendar days (including validation(s) in Enablon) from the time of incident occurred.

Protection of employees from occupational health hazards

The protection of employees from occupational health hazards is assured by compliance with national laws and internal MOL Group regulations and practices (e.g. the abovementioned Group HSE MS process description), combined with continuous activity of high quality professional operating staff. MOL applies best practices in its local operations which are continuously improved. Extending the general occupational safety activity of safety professionals, occupational health and medical service providers:

- carry out the fit for duty medical examinations specified in legislation and initiates the additional necessary special examinations,
- cooperate in the investigation of occupational diseases, suspicions and increased exposure cases in accordance with the specific legislation, organize special investigations, and conduct statutory procedures,
- examine the health effects of work,
- provide personal protective equipment advice,
- provide information on the working conditions of employees,
- carry out periodic medical examinations for each occupational group,
- track the occupational health records of employees properly,
- take part in relevant workplace hygiene inspections,
- conduct examination of the conditions of employment of workers with disabilities,
- comply with all reporting obligations for occupational health,
- cooperate in defining and managing pandemic prevention and protection measures (in cooperation with further specific professional service providers),
- cooperate in workplace health promotion programs.

The obligation and details of management of the regular and ad-hoc medical check-up process is defined on the highest level in HSE MS, Appendix 6 B. I. 2.2. Fitness for duty.
The access of this health services even above the MOL Group requirements in vast majority of the countries is a strong legal obligation as well. The high quality of the services is ensured by very strong tendering in case of new contracts and continuous control and close professional cooperation (group and local levels) with all service providers for continuous improvement based on best industrial practices. Among the services providers there are subsidiaries of big and recognized international companies, big national and local service providers, specialized health services (e.g. Affidea, Medicover, Buda Health Center, ProCare etc.)

Worker training on occupational health and safety

MOL Group provides regular occupational health and safety trainings for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization (contractors). This includes generic training as well as site-specific trainings or trainings on specific roles, work-related hazards, hazardous activities, or hazardous situations.

Recruitment, selection and placement processes are locally in place to ensure that personnel are qualified, competent and physically and mentally able to meet job requirements. Legally required HSE qualifications must be met for specific jobs. Employee and contractor/supplier HSE and process safety competencies and training needs must be identified, documented and periodically reviewed. Training plans and calendars must be synchronized with HR for the best resource management. Written procedures must exist to govern HSE Competency Assessments and Training procedures at company level. It must contain the following:

- Content; length of the induction HSE Training and the way of examination,
- Requirements regarding the training of visitors, students and part time employees,
- Practical training requirements if applicable,
- Refreshing training requirements including frequency (yearly frequency is recommended) and topics: induction and practical training topics, new HSE requirements becoming effective since the last training, and lessons learned from incidents.

MOL Group companies continuously seek for real 21st century training method possibilities with the aim of higher training efficiency – please see recent developments in section 'Actions and resources related to occupational health & safety'.

Promotion of workers' health

Health risks are assessed and managed by prevention and protection, providing employees with information and educational initiatives. MOL Group's workplace health promotion programs serve as additional tools to increase the personal health awareness of our workforce not only at the workplace, but also in their private lives.

MOL Group conducted health management gap analysis at main operating companies in order to identify the critical gaps to our standards and required level of compliance and set appropriate actions to eliminate them in an acceptable period of time. We believe that by implementing the identified and approved development actions MOL Group definitely takes a step ahead towards providing healthy workplaces and appropriate health management, including emergency response for all employees. According to MOL Group health management principles we order in general annually or biannually health screenings, but at least once per 3 years to all of our employees based on a detailed screening protocol, depending on the nature of their work (in case of stricter local legal requirement we always comply with local rules as well).

Besides this, we conduct screenings for known health risks (such as diabetes, cholesterol, calculation of Body Mass Index (BMI), etc.) and we draw up an individual basic health plan for all of our employees. Individual health plans are a professional starting point, but we also offer special workplace health promotion programs to our employees, that include a variety of medical screenings in different countries/ areas, with different timing (e.g. cardiovascular package, cancer prevention package, musculo-skeletal package, vaccination programs), healthy lifestyle advice, dietary advice, stop smoking programs and a wide range of physical activity programs.

At the Family Days that are organized by the companies, the family members of our employees have the opportunity to participate in health screening for different health risks (diabetes, cholesterol, BMI, etc.) as well. Health promotion programs are organized locally in order to contribute to both the health and well-being of employees. Different regular individual or group sport activities are supported inside or outside of company facilities (e.g., own sport events, participation in national and/or regional sport events, hiking and health walk activities in groups by purchasing equipment, renting room, providing sport passes, paying participation fee, providing team T-shirts and/or refreshments, setting up a team tent, etc). For our colleagues travelling to and working in countries with a high risk or incidence of communicable diseases we conduct medical screening before travelling and after, and we supply the required vaccinations as well. MOL Group is providing 24/7 services for any potential medical evacuation (MEdEvac) needed around the globe for its expatriates and travellers, and in special situations the local employees of MOL operations if medically necessary, by contracting one of the leader service providers of the industry. Contractors of MOL Group are not covered by these initiatives.

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

Product stewardship within MOL Group and relevant member companies are assigned and responsibilities for individual Product stewardship process steps are defined. Product stewardship processes identify risks related to dangerous substances/products at an early stage and manage those risks along the value chain (i.e. development, authorization, registration and restriction on their manufacture, market distribution, use, disposal or recycle), thereby enabling adequate protection of human health and the environment, in line with the REACH legislation. New product assessments are conducted prior introduction to market in order to identify and address health, safety and environmental hazards and risk associated with their normal use and potential misuse. Periodic re-assessments must be conducted if product specification changes, including collection and review of adverse effects reported or experienced. Records of assessment and re-assessment are kept up to date. A product dossier must be established for all dangerous products bringing together all the information that the company holds on a product throughout the lifecycle. The OHS aspects are described in the element 6 of HSE MS, its details are available in the appendix 6B I. 2.1 Risk based approach and appendix 6B II. Safe operations and work practices.

Process Safety & Management

MOL Group operates a set complex of industrial assets were rigorous maintenance, timely asset replacement, and adherence to strict safety protocols must be in place to avoid the loss of mechanical integrity, technical, technological or operational issues, natural disasters or human errors. Such events can potentially lead to severe environmental damage (products spills or leakage of hazardous substances – IM-04), personal injuries (see IM-13, RK-04) – besides cost to replace damage assets and remediate environmental damage. Group-level Process Safety & Management principles are outlined in the PSM Process Description (currently only internally available):

- **Process Safety Management (PSM)** is disciplined framework for managing the integrity of hazardous operating systems and processes. It deals with the prevention and control of major events with the potential to release hazardous materials or energy. The PSM elements that group processes and practices designed to prevent LOPC and other types of asset integrity or process safety events via methodologically identify, understand and reduce risks associated with and mitigate any potential consequences of such events. PSM system elements support hardware and human barriers.
- PSM system, due to its cross-functional character is very complex, including research/development (R&D), engineering, construction, operation, maintenance, training and sourcing. The structure of this regulation is based on key elements defined by the so called “PSM Wheel”.
- The scope of this process description is valid for those consolidated MOL Group companies which operate hazardous chemical or non-chemical operating systems and technological processes assessed based on risk assessment according to HSE MS.
- Business Unit leaders are accountable to implement the PSM system within their scope with the coordination of the local PSM leader and in cooperation with Group Process and Fire safety leader and Group PSM coordinator.
- Process safety indicators follow the API 754 standards or IOGP recommendations.

Process-based regulations on avoiding, controlling and limiting and environmental and health & safety related impact of incidents and emergency situations are outlined in the Element 6/A Operational safety; Element 10: Incident Management an in Element 11: Emergency Preparedness & Response sections of the HSE MS. These Group-level guidelines ensure the effective management and minimization of environmental and health and safety impacts from incidents and emergencies at all critical assets. Operational safety measures focus on maintaining asset integrity, implementing robust maintenance and inspection programs, and ensuring the proper functioning of safety-critical equipment, supported by trained and competent personnel. Incident management systems ensure all health, safety, and environmental incidents are thoroughly reported, investigated, and analysed to prevent recurrence, with lessons learned shared across the organization. Emergency preparedness and response plans are designed to protect people, the environment, and assets through comprehensive scenario planning, resource readiness, regular training, and drills, ensuring a rapid and effective response to any emergencies.

Worker security (IM-19; RK-09)

The **Security Area Book** is the highest level, process-based policy related to the Security services at MOL Group. It contains a comprehensive set of principles for security governance, security operations, technical security services, crisis & continuity management, travel security and anti-fraud & investigation related activities, thereby covering impacts and risks related to both physical security of workers (IM-20, RK-13) and to unfair business conduct and fraud (IM-10, RK-11). Group Security Director as process owner is responsible for the implementation, for identification of regulatory need and regulation issuance in cooperation with local responsibles. The provisions of this policy must be implemented at all MOL Group companies (i.e. MOL Plc. and controlled operative subsidiaries involved into matrix operation) and are obligatory and binding for affected employees. To ensure awareness, MOL Group has mandatory trainings covering all key areas, whilst relevant policies are available to all employees on MOL Group's E-REG system.

Through the comprehensive measures outlined in the Security Area Book, MOL Group effectively manages the potential threats posed by low-security and high-risk environments (IM-20, RK-13). Security considerations based on a risk-based management system that identifies and analyses security threats and vulnerabilities are integrated into all business and functional processes, ensuring proactive risk management from the planning phase through to operation and discontinuation. This approach is critical for mitigating physical security threats as it ensures operations in low-security areas are supported by site-specific security measures:

- **Security Operations Centre:** Security Operations Centre based security operational model across the group which allows centralised evaluation of relevant information and centrally directed/ supervised responses to incidents.
- **Localized Security Responses**: Acknowledging the varying security risk environments in the countries where MOL operates, the Security Area Book mandates localised, tailored responses to protect people, assets, operations, and reputation, by addressing threats such as criminality, terrorism, and social unrest by deploying context-appropriate countermeasures.
- High risk countries have a VUCA (Volatility, Uncertainty, Complexity, and Ambiguity) environment. Therefore, in these countries the applied security measures, including physical, technical and personal protection and security must be robust, modular, quickly reactive and at all times responsive and adequate to the actual security threat level and types. The MOL Group's Physical Security Risk Management framework defines standardized solutions to deliberate security threats:
- Before entering new countries or starting new projects, MOL Group conducts security planning to address potential threats.
- Compliance with international security standards including SOLAS Convention (standards for the construction, equipment and operation of ships),and ISPS Code (comprehensive set of measures to enhance the security of ships and port facilities, developed in response to the perceived threats) for offshore operations
- Collaboration with government agencies, law enforcement, commercial security providers, and industry peers to stay informed on evolving threats and best practices.
- Protecting expatriates and their families is a top priority in high-risk areas. Security shall provide professional deployment and security brief for expats and provide professional hostile environment awareness training. Local security department must have local regulations covering at least the following standard operating procedures:
  - Implementation of B6 vehicles
  - Convoy movement
  - Close/ personal protection
  - Body guard(s) for expat managers
  - Guarding of expat's residences
  - Security House Rules for offices, facilities, sites
- When third-party security services are used, MOL Group ensures rigorous oversight through regular audits and performance evaluations, site-specific instructions for security guards and legal compliance in search procedures and contraband management.

ENGAGEMENT RELATED TO HEALTH, SAFETY AND SECURITY OF WORKERS

/S1-2/

MOL Group's internal communication with the workers is assured by compliance with national laws and internal MOL Group regulations and practices. "Works councils" are present across MOL Group operations and provide a constant professional communication and interest protection channel within MOL Group between management and – independently elected – MOL employees. Establishing "Works councils" is a legal requirement in many countries of MOL Group operations. The right and at the same time task of the works councils is to participate in and even challenge – besides other aspects – the health and safety relevant decisions of the employer, and the basis of its operation is the cooperation of employers and employees.

The local "Works councils" are operating and having regular joint management-worker meetings, joint meeting with occupational safety committees and forums at different Business/Company levels within the organization (usually on a quarterly basis) based on the local law and operational descriptions that describe the dispute resolution mechanism, the chairing responsibilities, and how the committee members are protected against reprisals.

The policy ensures that employees and their representatives may not be subject to adverse consequences for acting in order to implement the requirements of safe work, or for reporting in good faith due to the employer's perceived negligence. The law allows employees to exercise their right to participate in several ways, depending on the number of employees and the structure of the employer organization.

Special, OHS dedicated local (local business and/ or Company level) occupational safety committees also are operated, based on legal requirements and agreements between employer and employees, with independently elected membership from the companies' employees.
For example, an election of safety representative must be held at all employers where the number of employees reaches 20 (in MOL and INA) or 10 (in Slovnaft) people. It is the employer's responsibility to conduct the election and ensure the conditions. The safety representative is entitled to make sure that the requirements for safe work are enforced in the workplace, so in particular:

- about the safe condition of workplaces, work tools and personal protective equipment,
- on the implementation of measures to protect health and prevent work accidents and occupational diseases,
- on the preparation and preparedness of employees for safe work.

For exercising their rights, safety representatives are allowed to:

- enter workplaces in their operational area during working hours and get information from the employees working there
- participate in the preparation of the employer's decisions that may affect the health and safety of employees,
- request information from the employer on all issues affecting safe work,
- express an opinion or initiate the necessary measures to be taken by the employer,
- participate in the investigation of work accidents,
- turn to the occupational health and safety authority with jurisdiction (in justified cases),
- communicate their comments during official inspections to the person performing the inspection.

According to local legal background – e.g. in Hungary if the number of safety representatives reaches three –, a workplace occupational safety committee can be established. If a committee is established, the rights of the safety representatives will be exercised by the committee. Where safety representatives operate, the employer establishes a parity safety board, in which equal numbers of employees and employer representatives participate. The employer is obliged to appoint a senior employee entitled to make a decision to the board, as well as a person who partially or fully performs the employer's occupational health and safety duties. The duties of the chairman of the board are exercised alternately by the representatives of the employees and the employers.

Furthermore, besides the above-mentioned health and safety relevant professional employee involvement-communication-information channels(s) various other employee interest-protection, information and consultation committees, councils, bodies exist, on local or country levels within our operations, according to relevant legal background, which within their overall employee representation also could manage the health and safety relevant topics in cooperation with the above-mentioned ones. MOL Group's local councils have delegation in the various trade unions, local works councils; whilst on the Group-level the European Works Council consist of the leaders of local councils, having a MOL Group European level series of meetings half-yearly, with presence and active participation of MOL Group top executive management. At these meetings all relevant business and HSE aspects are discussed at the highest level, consisting of last half year actualities, present status and the roadmap of the next period.

The councils, safety committees then cascade down all the relevant information on all their local levels. All these bodies – trade unions (where people in the workforce are unionised), works councils, safety committees etc., on their relevant level – operate various channels for raising concerns or needs include grievance mechanisms, hotlines, dialogue processes or other means through which the undertaking's own workforce or workers' representatives can raise concerns about impacts or explain needs that they would like the undertaking to address (both channels provided by the undertaking directly and channels provided by the entities where their own workforce is working). The operation (general operational rules, election structure, cooperation, frames of financial and human resources, etc.) of all these bodies is supported by the relevant HR departments.

Besides the abovementioned system of works councils and occupational safety committees, all workers are entitled to express their opinions, raise concerns or report any issues (including health and safety) via the Group-level whistle-blower mechanism, SpeakUp!. For more information, please refer to section 'S1-3-C: Policies related to grievances and remediation'.

ACTIONS AND RESOURCES RELATED TO OCCUPATIONAL HEALTH & SAFETY

/S1-4/

ESRS	Disclosure Requirement S1-4
GRI	GRI 3, 3-3 GRI 403, 403-9

	GRI 403, 403-10

Actions on occupation health & safety (IM-13)

The most common root for most of all cases were determined to be lack of attention/care, sometimes improper technical conditions were identified too, and rule violations were still found in some cases as well. After a multi-year smooth implementation of the six Group-level Life Saving Rules introduced on 1 January 2020, we improved and unified the consequence management of any rule breaches at the end of the year – not concentrating only but highly focusing on these incompliances. However, the continuous enforcement of these LSRs is still needed, especially at the periodically fluctuating contractor teams with the unchanged aim of increasing individual awareness and promoting ownership of critical safeguarding measures to prevent injuries and fatalities.

MOL Group continued to provide Occupational Health & Safety (OHS) trainings for own staff and contractors in compliance with external rules and internal regulations. For own staff's continuous HSE education we continued to extend the Axonify, adaptive mobile application-based tool, called LEON, which after its successful introduction in MOL Upstream, also was successfully introduced in MOL Logistics, and it was extended to almost all Business Units in MOL Hungary in 2024. Further goal is to further extend it to other big operations as INA and Slovnaft (SN) where different sized pilots are being conducted. To support this, a Group DS management level pilot continued besides the 6 Life Saving Rules with Firs Aid training, Fire protection, Process Safety sessions, and pilots also continued in INA and SN as well.

In 2024 we approached the management with a new experimental training session, so-called "Consequences training" – making them more demonstrative the possible effects on the staff of their decisions. These half-day trainings or workshops held for 10-15 managers (at any levels, supposed to cover the full management team of a group or local level organization) are organized at the physical training and drill facility of FER Fire Brigade in Duna Refinery, and contain different physical scenes, exercises from the operational and maintenance blue-collar life, which can put the participating managers in heavy, uncomfortable physical situations in a safe environment, making them feeling-touching-understanding the possible consequences for the staff of their possible not HSE-conscious decisions. Already teams of Group Downstream, Logistics, Investment, Industrial & Corporate Services Management and also HR areas participated on these events with really positive feedback.

MOL Group's 'Safety First' approach still targets ensuring safe workplaces and activities, following all internal and external H&S rules, whilst maintaining continuous OHS professional support across all operations. As already reported, in 2021 two major new Group-level OHS initiatives were the launch of Personal Protective Clothing (PPC) and Personal Protective Equipment (PPE) harmonization tenders: after closing successfully the PPE tender in 2022 with conclusion of new contracts, finally at the end of 2023 we closed successfully the PPC tender as well, in order to ensure world-class, high quality protective garments for our whole staff. First deliveries started in Q2 2024 and are being continuous with the agreed quarterly scheduling for our operations in Slovakia and Hungary. Since the overall satisfaction with the new protective garments is high, the smaller subsidiaries e.g., in Romania, Serbia, Austria, etc. are being negotiating the joining to the service through accession contracts as well. In Croatia a separate contract was also concluded with the same technical content negotiated and finalized in the Group tender.

Besides the above-mentioned, mainly fully Group-level safety initiatives and actions, many Group Business- or Local Business level further programs were initiated and managed to increase the safety awareness and safety performance of the given area, considering the covered areas' specialities and most relevant risks. Let's have some examples without claim to be exhaustive:

Deep discussion and understanding of incidents, their background and improvement possibilities on managerial level through dedicated Incident Review Committees in Group Upstream and Group Logistics and Group Production in Downstream, similar event-management in Retail and Lubricant companies as well; Besides quarterly Group level HSE Committees, similar ones organized on lover levels in Group Upstream, Group, MOL and INA Logistics level and Lubricants; Unsafe/ unconscious behaviour concept emphasized in MOL Upstream, Group Production, Logistics and Lubricants; Different local bonus-malus systems launched on almost all areas for own and contractor employees, evaluating their everyday approach to safety aspects and rules; Group Retail level Retail HSE Competition for recognizing the HSE-conscious SeS network operation; Further local special, occasional trainings, action and/ or communication campaigns involving all levels from shop-floor to managers; and many others.

To improve the in-person contractor HSE trainings as well, INA Production continuously operates its demonstrational Training Center in Rijeka Refinery from the end of 2022, and Slovnaft Refinery also was using the already existing Training Center – used earlier only for own staff – for contractors' work supervisors, before every bigger maintenance activities, Turnarounds. In Duna Refinery, Hungary the FER Fire Brigade's Training Center was also used for practical training for contractors' work leaders, based on a previously developed training concept, covering safety aspects of work-permit system, working at heights, fire extinguishing, emergency response, and flange dismantling.

MOL Group continued to strengthen its overall Contractor-HSE program in order to improve the performance. The contractor HSE qualification and audit process, which was released in 2023 is being further improved, with the aim of covering similarly to our direct contractors the sub-contractor layer as well, keeping the focus on registration, screening, qualification and procurement procedures of suppliers in a more systematic, transparent and comprehensive manner. The OHS's focus on the Contractor Safety program in 2024 was on the proper contractor selection, enabling proper preparation according to the existing circumstances, before contractors' mobilization onto their worksites. During the year we decided to further improve our service procurement processes and supporting system (called SAP Ariba) for which we established a project team and assessed the needed improvements. The proposal was accepted by Steering Committee in December 2024, the realization is due in Q2 2025.

Additionally, the Injury Prevention Action Plan elaborated and implemented in 2023 in Group Industrial and Corporate Services (including all our Single Service Companies), covering more typical areas of Contractor Management and contracted onsite works' lifecycle, aiming the reduction of risks and injury occurrence, was considered successful, thus we applied it for 2024 too, and we aim to continue with that as a kind of a rolling action plan for the next years as well.

In line with the increased contractors' worked hours (by more than 11% in 2024) we performed an increased amount of site inspections as well in 2024 (30,012) in comparison we did in 2023 (28,183) In order to cover as many contractor activities as possible. However, we realised that the high inspection numbers do not necessarily deliver better safety performance, so we intend to rather focus on depths and professional quality of these. A new methodology was introduced in the beginning of last year to record inspections in Enablon (Enablon Inspection Module), for better data analysis and improving action definition, which also was slightly restraining the further increase of the number of inspections performed. The quality of these was slightly increasing, shown by the increasing percentage of site inspections with non-compliances from 15% in 2023 to 18% in 2024.

In 2023 we heavily increased the number of pre-qualification audits compared to previous years, which resulted a higher coverage of audited contractors. Since we are facing a continuous change in the contractors' pool, in addition, the validity period of previous audits has expired in 2024, the number of pre-qualification audits in this year significantly increased to 363 (it was 255, in 2023). The quality and depth of these was also reinforced, however the ratio of successful pre-qualification contractor audits did not changed significantly93% in 2023 to 96% in 2024. Reflecting the decreased tolerance against any unsafe conditions, acts or safety rule violations, we continued to apply different penalties in case of different rule violations, but as mentioned above, on a Group-level unified and intentionally more deterrent way as well, like banning workers from the different sites (80 cases in 2024, 63% increase compared to 2023), or initiating written warnings as well (747 cases in 2024, 71% increase compared to 2023). Both are reflecting the more consequent and stricter application of our consequence management initiatives.

In 2024, the company allocated a total of USD 19.9 million to Occupational Health & Safety activities (excluding REACH-related expenses, which are reported separately), representing a 3.5% increase compared to USD 19.2 million in 2023.

Spending on **health protection** included the provision and maintenance of essential health protection equipment and assets (such as first aid kits and medical equipment), the cost of the health care services at all kinds, health-related trainings (e.g. first aid provider courses, health campaigns, etc.). Additional cost incurred on addressing working environment measurements – covering illumination, harmful substances, dust, and noise.

Expenditures related to **work safety**, include costs of personal protective equipment (PPE, any kinds, including their cleaning and maintenance as well). The company also allocated resources to campaigns, safety billboards, and safety-related training programs, including workplace risk assessments and road safety studies, enhancing the Occupational Health and Safety Assessment Series (OHSAS) system, and developing contingency plans, services of safety coordinators, permit-to-work system management, and analytical measurements of workplace conditions.

Actions on process safety (RK-04)

In 2024 constant targeted safety programs aimed both the workplace and process safety. The perpetual "Together in safety" program in Upstream still has run and " Safety Matters" was introduced in the Downstream as a joint campaign for the Logistics and Production. Both of them targets mainly the safety culture and the awareness which is inevitable for understanding the importance of being compliant with our safety rules and in case of DS campaign targeted 4 shared areas reflecting either on existing things like process safety fundamentals, health-check audits on performance, safety tours, but bringing new initiatives as well like the operating discipline and the roll-out of LEON mobile application.

Actions related to worker's security (IM-19, RK-09)

In 2024, two serious security incidents occurred within MOL Group, both at the VA-3 site of MOL Pakistan, where armed miscreants launched attacks from an adjacent mountainous area.

The first incident took place on 10 June 2024**.** At the time, 14 staff members and 17 Frontier Constabulary (FC) soldiers were present at the site. They successfully prevented the attackers from descending from the mountain, and no harm was inflicted on personnel.

The second incident occurred on 6 September 2024**.** Approximately 20-25 attackers, divided into three groups, launched an assault. Two groups remained stationed on the mountain, while a smaller group attempted to approach the facility. No MOL staff members were on-site at the time. The 26 FC soldiers present repelled the attack after an hour-long exchange of gunfire. While no personnel were harmed, six bullet impacts were observed on the compressor, and the water tank sustained two bullet hits.

TARGETS RELATED TO HEALTH & SAFETY

/S1-5/

ESRS	Disclosure Requirement S1-5
GRI	GRI 3, 3-3

Targets on occupational health & safety

MOL Group's objective continues to be comparable with top Q1-Q2 Oil and Gas companies in terms of safety performance. This objective is tracked using metrics-based targets to support policy execution while addressing impacts and risks.

In alignment with international standards (facilitating comparisons both with industry peers and across other industries), the primary indicator for worker health and safety management at MOL Group is the Total Recordable Incident Rate (TRIR). This metric reflects the total number of recordable injuries (TRIs, consisting of lost time injuries + restricted workday cases + medical treatment cases) considering both MOL Group employees and contractors, per 1,000,000 worked hours by the same group. TRIR is constantly monitored and reported both towards the top management of the company, and to the public as well as part of the quarterly flash reports.

Each year, the Group HSE Committee proposes a tolerable TRIR limit at the Group level, as well as for key business divisions within the Group. This limit is subject to approval by the Chief Executive Committee. For 2024, the Group-level tolerable TRIR limit was set at 1.3, and the final rate shows a far better performance, with the actual TRIR value of 1.04 (see detailed explanations in Section S1-14: Health and Safety Metrics).

For 2025, considering the previous years' TRIR performance trends, also compared to our target-trend of last few years and considering the Global and European Upstream and Downstream players TRIR performances of last few years too, the Group-level TRIR target has been set to 1.25, underscoring our commitment to a smooth, reliable, continuous improvement in worker safety.

Targets on process safety

2030 APC target is to put the overall number of Process Safety Tier1 incidents on downward trendline. Annual breakdown for 2025 pointed a tolerable limit of 7 Tier1 incident MOL Group overall. In details, it consists: 3 for Upstream, 4 for Downstream Production, 0 for Downstream Logistics and 0 for Retail. Target setting also assigns a tolerable limit for over 1 m3 HC spillages into the environment. In this case we have numerical target for Downstream Production with a 4 maximum allowed incident and for Upstream and Downtream Logistics the continuation of surface integrity and corrosion management programs must be in place with a trackable record.

METRICS RELATED TO HEALTH AND SAFETY

/S1-14/

ESRS	Disclosure Requirement S1-14
GRI	GRI 403, 403-8 GRI 403, 403-9 GRI 403, 403-10

	UNIT OF MEASURE	2024	2023	ESRS
Employees covered by a health and safety management system	%	95	N/A	S1-14_02

95% of employees are covered by a Group-level Health and safety management system. It is calculated as the full number of employees (headcount), where a management system is in place. Detailed description about this policy is available in the Policies related to Health, Safety, and Security of Workers section.

	UNIT OF MEASURE	2024	2024 w/o Midstream	2023	ESRS
Fatalities as result of work-related injuries - own workforce (own staff + contractors)	number	0	0	9	S1-14_02
Fatalities as result of work-related ill health - own workforce (own staff + contractors)	number	0	0	0	S1-14_02
Recordable work-related accidents (TRI) - own workforce (own staff + contractors)	number	96	95	117	S1-14_04
Rate of recordable work-related accidents (TRIR) - own workforce (own staff + contractors)	per 1 mn worked hours	N/A	1.04	1.31	S1-14_05

MOL Group provides a comprehensive list of data around worker related injuries, covering both own staff and contractors. No workers have been excluded – this is ensured by the internally audited HSE MS of MOL Group covering own staff and 100% of all our on-site contractors. Besides, Contractors performing high HSE risk activities for MOL Group, are to be covered by a system that has been audited or certified by an external party (SCC/VCA). Absolute numbers of contractors is not published as it is highly variable based on the number and extent of given activities all over the Group. The calculation methodology is described in the HSE Reporting Handbook (full document is only internally available for MOL Group relevant users)**.**

As highlighted above, MOL Group's objective continues to be comparable with top Q1-Q2 Oil and Gas companies in terms of safety performance. Transparency concerning worker related injuries is a high priority. MOL Group provides a comprehensive list of data around worker related injuries, covering all own workforce (own staff and contractors) as described above.

Rates have been calculated based 1 million working hours, as one of the two options being suggested by the GRI Standards.

FGSZ Zrt. (Midstream) recorded one work related incident in its own workforce, resulting in a TRIR of 0.88. Since information for recordable work related accidents of contractors is not available, full consolidation of the above metric is not possible.

Fatalities

In 2024 we could deliver our safety target not only in terms of TRIR but also from viewpoint of fatalities, targeting here zero, as the only acceptable level. All in all, no own employee fatality happened, which is an improvement compared to the previous years' trend (last own staff casualty was in 2022), and also contractor fatality we didn't have, in contradiction with the extremely sad previous year, when nine contractor fatalities occurred.

Although as said, the Group's 'Zero fatality' goal is being met, in addition, just as in the last year (1 in 2023), one third-party fatality in June was also considered work-related, being caused by non-preventable road accident in MOL Romania: around noon, a passenger car that was coming on the other side of the road suddenly has left its lane and collided frontally with our contractor's tank truck delivering fuel to a MOL Romania service station. The driver of the passenger car has passed away on the scene.

Personal safety

MOL Group experienced a 18.8% YoY decrease in Total Recordable Injuries (TRI) among own employees and contractors, reaching a combined 95 in 2024 (117 in 2023), resulting that MOL Group recorded a 20,6% decrease in the Total Recordable Injury Rate (TRIR, measured by number of TRI cases per one million worked hours) for own staff and contractors as well (reaching 1.04 in 2024, compared to 1.31 in 2023), also well below 1.3 tolerable limit set for the year.

The heavy decrease in number of TRIs despite the slightly increased worked hours (from 89,5 mn in 2023 to 91 mn in 2024) caused an even higher proportional decrease in value of TRIR, resulted by various different actions continued from previous years and newly initiated locally tailored ones by our Business Units and sites. These include different efforts to increase safety awareness, various Group-level and local actions initiated and implemented during the year, as well as the further increased attention to health and safety among staff. While the huge turnarounds and other maintenance- and operation-relevant, mainly manual activities still contributed significantly to the number of TRI events and consequently TRI rate as well (not only in case of contractors, but own staff as well).

During 2024 the number of Lost Time Injuries (LTI, including own staff and contractor fatalities) decreased by almost 17%, to 84 from 101 in 2023, which resulted in also a significant decrease (18,5%) in Lost Time Injury Frequency (LTIF, measured by number of LTI cases per one mn worked hours): to 0.92 during 2024 compared to the 1.13 LTIF recorded in 2023.

Overall, the top causes of the TRIs during 2024 were still slips, trips, falls (generally caused by human error and/or lack of attention), making up 39% of all injuries, followed by different finger and hand injuries (24%). However, for 2024 we analysed not only the background of TRI cases, but all our (own and contractor) FACs (first aid cases, less serious than TRIs, thus not recordable) as well: the Slip&trip injuries are the top causes there (25%), the hand injuries are on the second place (23%), while with relatively high number of insect bites are the third highest (13%) ones.

Work-related ill health

MOL Group registered one occupational illness for own staff employees during 2024.

- The number of fatalities as a result of work-related ill health: 0
- The number of cases of recordable work-related ill health: 1
- The cause of work-related ill health: tick bite

After long years without this kind of event, last year only one event was reported in MOL E&P, caused by tick bite in 2023. The case had along investigational and approval procedure according to Hungarian national legislation, and was finally confirmed by Authority as work-related ill health case only in 2024.

According our Group HSE Reporting Handbook, Occupational illnesses (work-related ill health cases) are to be internally recorded in Enablon in the year, when the Authority accepts it.

MOL Group does not record the possible occupational illnesses of contractors (workers who are not employees but provide contracted activities on MOL Group sites), since the management of this is employers' right and task by law.

In order to avoid all work-related ill health cases, irrespectively on their nature, MOL Group companies determine and evaluate all risks and hazards with potential effect on their employees' and contractors' health and safety, eliminating them through dedicated actions (refer to GRI 403-2 a.). Risk/hazard assessments are carried out locally, action planning (incl. using the hierarchy of controls) are also done locally for work-related hazards that pose a risk of ill health. Thanks to the conscious approach only the above mentioned one work-related ill health case occurred in the last over a decade. The overall professional approach is detailed in the element 6B of HSE MS, its details are available in the appendix 6B I. 2.1 Risk based approach and appendix 6B II. Safe operations and work practices. No own staff workers have been excluded.

Methodology for calculation is found in the Mol Group reporting handbook.

MOL Group does not disclose number of fatalities and recordable cases as a result of work-related ill-health, and also not the main types of work-related ill health cases, of other people than employees, since the management of this is employers' right and task by law.

Contractor safety

In 2024, no contractor fatalities occurred. Lost Time Injury Frequency for contractors (measured by the number of LTI cases per one mn worked hours) decreased by 41.3% YoY, from 0.67 in 2023 to 0.40 in 2024 (including not own FS staff; even higher decrease is visible excluding not own FS staff: from 0.97 in 2023 to 0.47 in 2024 however, the frequency is a bit higher in the second case mentioned indicator – this represents 51.6% YoY improvement). In addition, the Total Recordable Injury Rate for contractors (measured by number of TRI cases per one mn worked hours, including not own FS staff) decreased by 34% YoY, from 0.81 in 2023 to 0.54 in 2024.

Due to the increased amount of contracted works in 2024 (without considering the not own FS staff, contractor worked hours increased by approx. 2.9 mn hours, more than +10%), with the lower number of recordable injuries (21 TRIs in 2024 compared to 33 in 2023) resulted in a significantly lower Total Recordable Injury Rate, 0.71 in 2024 compared to 1.23 in 2023.

Process safety

Process Safety Events	UNIT OF MEASURE	2024 w/o Midstream	2023 w/o Midstream
TIER 1 Process Safety Events	cases	9	9
TIER 2 Process Safety Events	cases	21	18
TIER 3 Process Safety Events	cases	1436	1387
TIER 1+2 Process Safety Event Rate	cases/mn working h	0.42	

During 2024, the number of TIER 1 Process Safety Events (PSE) reached 9 across the Group, keeping a constant after 2023, driven by the extensive safety programs with the operational discipline in the focus, continuous progress of preventive maintenance and the technical shutdown, turn around and LTA/LTE regime.

There was no major fire or explosion, which can lead to the permanent outage of unit, in most cases the reason was loss of primary containment, resulted in personal injuries in 3 cases. Each and every Tier1 events happened in the area of MOL Plc. Four out the five Downstream Production cases were related to loss of equipment integrity during non-standard operation or to improper preparation of equipment for maintenance work resulting in material release and multiply personal injury. In each cases the disparity of PSF can be justified. Retail operations registered 1 TIER 1 event in 2024. Of the 9 TIER 1 events, 1 was Severity 3 (high), 4 were classified as Severity 2 (medium), 4 cases as Severity 1 (low). Group-level TIER 1 PSE target for 2024 was set to seven, and a target of zero greater than 100k $ direct loss as a result if fire/explosion and no terminal outage of operation as result of Tier1 has been set by 2025. The number of TIER 2 Process Safety Events slightly increased to 21 during 2024 compared to the 18 events registered in 2023. The result of leakages were material releases, fires and asset damages, mainly related to the breakage of mechanical integrity. In 2023 there was a further decrease in the combined number of TIER 1+2 incidents (27) compared to 2022 (31).

Combined TIER 1+2 Process Safety Event Rate (PSER) for 2024 reached 0.42. The TIER 3 (including Demand on Safety System) was further reported to identify corrective measures to barrier system, the challenges of the safeguards and serves as leading and lagging indicators in the same time. Furthermore, the small and low severity incidents resulting in loss of primary containment were requested to be analysed on casual factors.

SUB-CHAPTER C: ETHICS

IDENTIFIED IMPACT RELATED TO DIVERSITY AND INCLUSION

/S1. SBM-3/

ESRS	Disclosure Requirement related to ESRS 2 SBM-3
GRI	GRI 3, 3-3

Impact related to ethics described in Table IM-11 below:

Table IM-11: Corporate culture

Severity	Moderate positive impact
Scope	CEE
Likelihood	Actual impact
Description	MOL Group recognizes its responsibility to foster well-being, fair treatment, and a safe and inclusive work environment for all employees, promoting diversity, gender equality & equal pay, and measures to prevent violence and harassment. As a major employer in the Central and Eastern European region, particularly in Hungary, Croatia, and Slovakia, the company significantly influences the evolution of corporate culture and ethical employment practices within the regional job market, setting a standard for responsible employment that extends beyond its own workforce.
Mitigation actions & remediability	MOL Group has established targets, policies, and actions aimed at securing physically and mentally healthy working conditions and ensuring fair treatment and opportunities for all employees, with special focus on vulnerable groups. To support our commitments, we have implemented a whistle-blower system called *Speak Up!* and an ethics council dedicated to identifying and addressing negative impacts on employees (see DR S1-2). Additionally, we collaborate with trade unions to guarantee representation and equal opportunities for all our workers. For details on policies, processes and key actions see DR S1-1, S1-2, S1-3, S1-4.
Time horizons	We consider the topic material on all time horizons.
Relevance in the value chain	Corporate culture is material impact across all levels of MOL Group's value chain.

POLICIES, ENGAGEMENT AND GRIEVANCES RELATED TO DIVERSITY AND INCLUSION

/S1-1; S1-2; S1-3/

ESRS	Disclosure Requirement S1-1, S1-3
GRI	GRI 2, 2-23 GRI 2, 2-25 GRI 2, 2-26 GRI 2, 2-29 GRI 3, 3-3 GRI 403-1 GRI 403-3 GRI 404-2 GRI 408-1 GRI 409-1

This section outlines MOL Group’s policies and processes aimed at ensuring a fair, ethical, inclusive work environment and mechanism in place to ensure grievances related to ethical matters.

Commitments related to ethical operations are laid down in the **Code of Ethics and Business Conduct.** It covers all topics related to the responsible management of the company. Principles related to the civil, political, economic, social and cultural rights of workers in MOL Group’s own workforce and people in its value chains are elaborated in this section (based on IV.2 of the Code); whilst Section G1-1 in Chapter Governance explains the company’s approach towards *Free and Fair Trade and Competition* (IV.3), *Anti-Corruption and Anti-Fraud* (IV.4), *Corporate Loyalty* (IV.5) and *Trustful Business Relations & Responsible Stakeholder Relations* (IV.6).

All Board members, executive officers and employees of MOL Group member companies must act in compliance with the policy commitments, which are approved on the highest management level. MOL Group makes conscious and continuous efforts to implement the Code and to ensure that ethical norms are adopted. All newcomers receive the Code of Ethics and Business Conduct prior to their first workday and get an onboarding Ethics training (e-learning or personal training), where they must pass a test. Annually all employees must pass the Code of Ethics test via e-learning or classroom training.

MOL Group respects the fundamental human rights as our Group Code of Ethics and Business Conduct stipulates. MOL Group respects the Universal Declaration of Human Rights which summarizes fundamental human rights in 30 articles (United Nations General Assembly 1948) and further guidance documents on human rights such as the UN Global Compact (2000), the UN Guiding Principles ('Ruggie Framework') (2011), the OECD Guidelines for Multinational Enterprises (2011) and voluntary principles about security and human rights – full list of relevant external guidelines are listed in the Appendix of the Code of Ethics and Business Conduct. MOL Group considers these codes of conduct to be compulsory guidelines, therefore the MOL Group Code of Ethics and Business Conduct is harmonized with the declarations of the above-mentioned agreements.

MOL Group's management is committed to high level social dialogue and partners with trade unions and works councils active at members companies employing the majority of the Group's employees. For further details, please refer to section on policies, engagement and grievances related to own workforce in Chapter S1-A.

IV.2 of the Code declares commitments human rights and worker's rights including but not limited to:

- Right to Human Dignity;
- Right to Life;
- Liberty and Security of the Person;
- Right to the Highest Attainable Standard of Health;
- Right to Just and Favourable Conditions of Work;
- Rights to Fair Wages and a Decent Living;
- Right to an Adequate Standard of Living;
- Right to Form and Join a Trade Union and Right to Collective Bargaining;
- Freedom from all forms of Forced or Compulsory Labour;
- Freedom from Child Labour;
- Freedom from Discrimination;
- Freedom of Opinion

These rights are ensured via processes and regulations in 6 key focus areas (with further details available in the documents mentioned above):

Workers' and human rights
We respect and actively promote human rights across our value chain, ensuring compliance with corporate policies, laws, and regulations while engaging stakeholders and contributing to community well-being. We oppose human rights abuses and assess the impact of our actions to safeguard these rights. Our focus includes workers, suppliers, local communities, and vulnerable groups such as women, minorities, children, persons with disabilities, indigenous people, and migrant workers and their families. We protect tribal populations and indigenous peoples, avoiding forced relocations, and prioritize human rights compliance among security service providers acting on our behalf.

Health, safety, environment (HSE) and security
As a major energy company, MOL Group recognizes the high safety risks and their potential impact on the environment. We are committed to managing risks responsibly, respecting human rights, avoiding harm to people and the environment, and reducing HSE risks from our activities. We strive to ensure safe working conditions, improve environmental management, and foster an active HSE culture through reliable equipment, skilled personnel, and sound practices. Additionally, we prioritize the security of individuals on our premises and the protection of MOL Group assets, including employees, technologies, physical resources, information, and reputation against security threats. Please find detailed disclosures related to worker health, safety & security in subchapter S1-B.

Equal treatment and opportunities
We at MOL Group are committed to combatting discrimination in all areas of the workplace, throughout our supply chain and in society as a whole. MOL Group understands the value of diversity. Our employees, customers, business partners, suppliers and other external stakeholders are citizens of many different countries with many different nationalities, faiths, religions, beliefs, culture or social origins. We support cultural diversity, the creation of an international team and business community. MOL Group is committed to prohibiting and preventing discrimination of any kind, such as but not limited to discrimination based on race, colour, gender, age, language, religion, political or other opinion, ethnic or national or social origin, property, birth, sexual orientation or any other status including matrimonial or parental status, and to providing equal opportunities to everyone, based on merit, except when particular professional ability can justify selection. Unlawful discrimination is not tolerated, and our publicly available diversity and inclusion programs reflect this commitment.

Dignity and mutual respect
MOL Group is committed to fostering a work environment built on mutual trust, where everyone is treated with dignity and respect. We maintain a fiduciary relationship with our stakeholders and expect the same in return. Harassment, intimidation, or any behaviour that is degrading, offensive, or hostile is not tolerated. Sexual harassment, defamation, and slander are serious violations of human dignity. Everyone within MOL Group, our supply chain, and our communities deserves courtesy and respect.

Protection of privacy
MOL Group is committed to respecting people's privacy and keeping their personal information confidential. We will only acquire and keep personal information that we need in order to operate our company effectively, which is in compliance with the law. MOL Group undertakes to adopt preventive security measures for storing personal data on databases, in order to avoid any risk of destruction and loss or unauthorised access. Details and policies related to information and cyber security can be found in subchapter G1-C.

Fair labour practices
At MOL Group, employees are our most valuable resource. We prioritize their development, work-life balance, and adherence to lawful and fair employment practices. Forced labour, child labour, and unethical practices such as wage withholding or denying rights like sick leave are strictly prohibited across our operations and supply chains. We uphold a minimum working age of 15 for non-hazardous and 18 for hazardous work unless local laws specify higher limits. MOL Group ensures fair employment, supports employees with special needs, and handles disciplinary actions and redundancies with fairness and transparency. We also respect freedom of association, union membership, and collective bargaining rights. For further details, please refer to 'Policies & engagement related to own workforce' section in subchapter S1-A.

Enforcing these principles are operationalised into MOL Group's internal regulations. Highest level of process-based regulations are the **Human Resources Area Book** and the **Diversity & Inclusion Process Description**. Provisions of this Regulations are obligatory and binding for affected employees and cascaded to all companies across the Group (MOL Plc. and controlled, operative subsidiaries involved in matrix operation) via with local HR departments responsible for local action planning in line with Group pillars. Their key objective is to foster an inclusive workplace that promotes diversity, equality, and respect across the all operations by establishing and regularly updating MOL Group's Diversity & Inclusion Framework. The framework serves as the foundation for all human resource processes, focusing on key areas such as well-being, work-life balance, gender equality, age diversity, and inclusion of employees from diverse parental statuses, physical abilities, and ethnic backgrounds. The framework is endorsed by the Management Committee and the Chief Executive Committee of MOL Group.

MOL Group unequivocally prohibits discrimination of any kind, including but not limited to discrimination based on gender, nationality, race, religion, age, or any other status, in compliance with local and national legislation across all jurisdictions where it operates. MOL Group's recruitment and selection processes are designed to ensure equal opportunities for all candidates, with a focus on competency-based methodologies and cultural fit. All roles are open to qualified individuals without discrimination, and any restrictions are based solely on legal or educational requirements. New employees are introduced to the company's practices, procedures, and values to foster alignment with its inclusive culture. Managers and employees are held accountable for championing D&I principles in their daily operations, and specific attention is given to creating an environment that welcomes diverse perspectives, values employee feedback, and encourages open dialogue.

MOL Group ensures that all employees feel recognized and valued through robust employee recognition programs and inclusive workplace initiatives. Annual evaluations of D&I actions are conducted by the Group Culture & Employee Experience team, with findings reported to the Sustainable Development Committee of the Supervisory Board. Feedback is actively integrated into action planning and framework updates, ensuring continuous improvement.

Besides applying these standards into our own operations, MOL Group actively conveys its core values to partners and expects them to uphold ethical business principles. The **Business Partner Code of Ethics**, a binding appendix to all contracts, applies to all MOL Group business partners, including suppliers, contractors, service providers, and advisors. It is publicly available on the MOL Group website.

As a mid-sized oil and gas company operating primarily in Central Europe, MOL Group faces relatively minor exposure to human rights risks in its value chains, with no identified violations to date. However, MOL Group remains committed to respecting fundamental human rights, as outlined in the **Code of Ethics and Business Conduct**, and ensures these principles extend throughout its supply chain. Particular attention is given to workers, suppliers, local communities, and vulnerable groups, including women, minorities, children, persons with disabilities, and migrant workers:

- **Prevention of Child and Forced Labor:** MOL Group strictly prohibits child, forced, bonded, or unethical labour practices. Business partners are required to adhere to these standards and inform MOL Group of any breaches while implementing corrective actions. MOL Group reserves the right to audit and terminate partnerships for non-compliance, conducting self-assessments, certifications, and on-site audits to verify adherence to ethical standards.
- **Training and Audits for Security Personnel:** MOL Group ensures that where it employs security forces (currently in Russia and Pakistan), are trained in human rights policies and procedures. To monitor compliance, MOL Group performs multi-tiered evaluations ensure transparency and accountability in security operations, reducing the risk of human rights violations. Security service providers are required to conduct daily and monthly self-evaluations for all security guards on duty. Using a standardized Daily-Monthly Evaluation Sheet, they assess the performance of each guard based on predetermined criteria and a three-tier rating system. These evaluations are then submitted to the MOL Group Regional Security Manager for review. Beyond self-evaluations, MOL Group's Regional Security Leaders conduct independent monthly audits to assess the overall performance of security forces. These audits include a Monthly Fluctuation Report that tracks personnel changes and performance trends.

Additionally, Regional Security Leaders prepare a Summarized Evaluation Report for submission to the Country Manager, offering a comprehensive review of security operations and highlighting any concerns or required corrective actions.

- **Rights of Indigenous Peoples:** Neither MOL Group CEE operations, nor its International Upstream operations located adjacent to indigenous peoples' communities. Nevertheless, MOL Group committed to protecting indigenous peoples' rights (based on the UN definition) under its Code of Ethics and Business Conduct. MOL Group's HSE MS requires assessing and mitigating potential social impacts, including protecting the health, safety, and living conditions of local communities; securing prior consent where necessary and avoiding involuntary resettlement; and preserving cultural heritage and traditional landscapes. More details on policies and actions related to local communities can be found in subchapter S3-A – Affected communities.

POLICIES RELATED TO GRIEVANCES AND REMEDIATION

/S1-3/

Whistleblower Mechanism

MOL Group is committed to maintaining the highest ethical standards across its operations. To support the enforcement of its principles and processes, the Group operates the SpeakUp! whistleblower mechanism, a secure and accessible platform for raising concerns, reporting violations, and seeking advice. Reports made through SpeakUp! are treated confidentially and can be submitted anonymously without fear of reprisal.

The SpeakUp! mechanism serves as a critical tool for fostering a culture of integrity, safeguarding the reputation of MOL Group and its business partners, and protecting the well-being of employees and communities. This platform is available to:

- Employees of MOL Group.
- Individuals in contractual relationships with MOL Group companies.
- Any external stakeholder with a reasonable and legitimate interest in reporting or addressing unethical conduct.

Violations of the Code may involve MOL Group member organizations, service stations, suppliers, distributors, contractual partners, sponsored or supported partners, or joint ventures. SpeakUp! is prominently accessible via MOL Group's website and referenced in contracts and codes. By enabling stakeholders to report concerns, SpeakUp! helps detect misconduct, legal violations, and other risks.

Reporting and Investigation Process

MOL Group emphasizes the shared responsibility to uphold its values and considers the failure to report unethical behaviour a potential breach of ethical standards. Misconduct or legal violations can lead to disciplinary action, including termination of contractual relationships. Retaliation against individuals who report concerns in good faith is strictly prohibited, and allegations of retaliation are subject to investigation by the Ethics Council. Annual ethics trainings are the primary means to increase awareness and keep trust in MOL Group's SpeakUp! system.

The investigation process adheres to the Ethics Council Rules of Procedure, an appendix to the Code of Ethics, and follows these steps:

1. **Receiving Reports:** Capture grievances and reports.
2. **Acknowledging Cases:** Confirm receipt and inform stakeholders of the process.
3. **Assessing Issues:** Evaluate the nature and scope of the reported concern.
4. **Assigning Responsibility:** Delegate cases to the appropriate organizational unit.
5. **Investigating Cases:** Conduct thorough inquiries based on established protocols.
6. **Approving Reports:** Finalize investigation findings.
7. **Issuing Resolutions:** Deliver Ethics Council decisions if ethical aspects are identified.
8. **Communicating Outcomes:** Share findings and recommendations with stakeholders.
9. **Monitoring Implementation:** Ensure corrective measures are applied.
10. **Reporting and Sharing Learnings:** Publish anonymized case studies to prevent recurrence.

Role of the Ethics Council

The Ethics Council is responsible for overseeing the SpeakUp! mechanism and ensuring its proper functioning. Its primary objectives include upholding MOL Group's ethical standards, addressing individual complaints, conducting ethics training, and supporting structured ethics improvement initiatives. The Council's functions include:

- Regularly reporting to the MOL Board of Directors, Chairman-CEO, and Supervisory Board on ethics-related issues.
- Reviewing completed investigations and findings.
- Monitoring ethics risks and implementing improvements.
- Overseeing key processes such as mergers and acquisitions (M&A), trading, and procurement through know-your-customer (KYC) and due diligence procedures.

The Council operates under the Ethics Council Rules of Procedure and is supported by:

- **The Preparatory Committee:** Conducts preliminary assessments and decisions.
- **Group and Local Ethics Officers:** Manage operational tasks such as investigations, grievance handling, and consequence management.
- **Country Chairpersons and CEOs:** Submit annual ethics-related reports to strengthen ethical foundations.

The Chairperson of the Ethics Council is an independent party, ensuring impartiality and fairness in all proceedings. Ethics Officers, appointed by CEOs of MOL Group companies with more than 20 employees, provide localized support and ensure the consistent application of ethical standards across the Group.

Legal and Organizational Framework

Established in 2006, the SpeakUp! mechanism operates under Hungary's whistleblower protection legislation. Ethics risks are continuously monitored and integrated into MOL Group's operations through:

- **Internal Regulations:** Updates to policies and procedures based on assessed risks.
- **Compliance Measures:** Ensuring adherence to both legal obligations and MOL Group's ethical norms.
- **Ethics Risk Assessments:** Embedded in M&A, trading, procurement, and other key processes.

By maintaining this framework, MOL Group reaffirms its commitment to integrity, compliance, and the well-being of its stakeholders.

ACTIONS RELATED TO DIVERSITY AND INCLUSION

/S1-4/

ESRS	Disclosure Requirement S1-4
GRI	GRI 3, 3-3 GRI 2, 2-24 GRI 203, 203-2

At MOL Group, multiple internal functions play crucial roles in managing impacts on the workforce, ensuring risks are addressed effectively, and promoting positive outcomes. The HR function takes the lead in managing impacts and risks related to human resources. This includes overseeing the implementation of Diversity & Inclusion policies, ensuring compliance with labour standards, and fostering an inclusive and supportive workplace environment. HR also supports the alignment of employee practices with MOL Group's values and strategic objectives. The Ethics function has a reactive role in addressing grievances and providing remediation. It is responsible for investigating incidents and ensuring fair resolution of complaints.

Actions to promote diversity and inclusion

MOL Group has taken targeted action to promote employee well-being and the development of corporate culture in line with the 4 strategic pillars of MOL Group's Diversity & Inclusion (D&I) framework are Multi-Generational collaboration, Female empowerment, Working Capacity and Wellbeing. (IM-11)

Several D&I events on Group level and in core countries were organized to introduce each focus area and show Group's commitments within each pillar (Multi-Generational collaboration, Female empowerment, Working Capacity and Wellbeing). During these occasions, external speakers, academia representatives as well as mental health professionals gave lectures or individual consultations and workshops raising awareness of enhanced collaboration across generations, supporting parents and female talent, the benefits of employing colleagues with disabilities and nurturing mental health in the organization. Across the Group, 26 actions were registered, with Wellbeing and multi-generational collaboration representing the majority of commitments, followed by women empowerment and disability. More concretely, family friendly programs, knowledge-sharing, mental health activities and creating an inclusive workplace were the most typical focus areas across the Group. Unconscious bias training has been embedded in the First Time Manager leadership development program, and on Group level 100+ leaders participated to create better inclusion in the organization. In INA specifically, White Cane Awareness Day Event, Dads at INA Campaign, to enhance workplace inclusion. At the end of 2023, INA was recognized as one of the first INC.Q Equal Pay certified companies, which is awarded to companies with less than 5% differences in salaries and financial awards between genders. INA continues being recognized by independent auditors (MAMFORCE® / DADFORCE®) whose evaluation of family-friendly and gender-non-biased policies implementation has shown INA being 19% over the market benchmark. INA also became one of the first companies to receive INC.Q best employer awards, winning in three categories: Best large company for women, Best energy company for wellbeing, Best energy company for Diversity, Equity and Inclusion. For the first time ever in INA there was a special event focusing on young women in business, with lecture and talk with Senior leader who is a woman. INA Group also continues its efforts to support students with disabilities with participation in "Experience is worths its weight in gold project" providing internship opportunities for students with disabilities. As of 2024, quarterly DEI trainings have been implemented, providing all employees with possibility to get familiar with the topic and how important it is within the Group. Slovnaft has also continued its cooperation with Diversity Charter in Slovakia, as an ambassador of the organization. Following the MOL Group D&I Framework, more than 15 different projects and activities were started in 2024 to enhance the awareness of our colleagues about relevant topics, including female colleagues and their career journey, overall wellbeing, mental health, multigenerational collaboration and cooperation of Slovnaft with retired colleagues. MOL Hungary has strengthened its family-friendly initiatives by introducing a DayCare program for school holidays and School Starting Packages for parents of elementary school children. These efforts have earned recognition, including the Family-Friendly Company title, the BeneFit Prize, and Employer Branding Awards.

The Diversity & Inclusion Ambition Gender Chapter commitments continued with voluntary recruitment targets and principles in terms of gender diversity to ensure MOL Group is the future choice of female candidates. During 2024, 31.8% of all hires were female, a higher percentage than the female representation at the Group, supporting the direction towards better gender balance. The percentage of women of all management positions increased to 28.2%. To achieve the targets and to regularly measure gender diversity, a semi-annual D&I Gender Dashboard is prepared and shared with senior management. To improve decision making and team management, the online Managerial People Dashboard was launched in Hungary providing data visualizations and reports about the headcount, diversity, fluctuation, aging, loyalty and internal movements in the organization.

Actions on incidents and complaints related to a fair, ethical, inclusive work environment

In 2024, the Ethics Council received 72 whistle-blower reports related to improper workplace behaviour (i.e., an employee behaved improperly while on company premises or at a work-related event with violating company values), and 13 related to unfair labour practices (i.e., an employee acted improperly or did not follow established company processes in the recruiting, hiring, evaluation, promotion, discipline, dismissal or compensation of an employee).

Furthermore, the following actions were taken in relation to promoting a fair, ethical, inclusive work environment:

- Monitoring local legislations regarding the EU Whistleblower Directive taking action if required by law
- Collaborating with relevant business units on understanding and implementing upcoming sustainability and human rights due diligence requirements
- Focus on awareness communication and partnership with peer organisations (Communication, Cultural Office, Security, etc)
- MOL Group's ethics program in 2024 centered on enhancing awareness through regular articles detailing real investigations in an anonymous manner, as well as mandatory ethics training for all employees.
- Efforts to communicate and educate on ethics were expanded to include governance body members, with ethics integrated into the annual training curriculum for both the Board of Directors and the Supervisory Board.

TARGETS RELATED TO DIVERSITY AND INCLUSION

/S1-5/

ESRS	Disclosure Requirement S1-5
GRI	GRI 3, 3-3

MOL Group's flagship commitments related to fostering a fair, ethical, inclusive work environment is to constantly ensure that all of our employees successfully complete the annual ethics training, and to reach the targeted minimum 30% of woman in management, applicable on HAY 18 and above. These targets are publicly communicated – including in MOL Group's Shape Tomorrow Strategy.

Women in management	UNIT OF MEASURE	2024	2023	2022	2021	2020
Percentage of female managers	%	28.2	27.9	26.5	25.9	26.1

METRICS RELATED TO CHARACTERISTICS OF EMPLOYEES

/S1-6/

Workforce /S1-6_1/	UNIT OF MEASURE	2024	2023	ESRS
Number of employees (HC)	persons	25 528	24 912	S1-6_01, S1-6_02, S1-6_09
o/w Male	%	73.1	-	S1-6_01
o/w Female	%	26.9	-	S1-6_01
Full time employees	persons	24 957	24 938	
o/w Male	%	73.8	74.1	S1-6_01
o/w Female	%	26.2	25.9	S1-6_01
Part time employees	persons	571	514	
o/w Male	%	45.7	51.9	S1-6_01
o/w Female	%	54.3	48.1	S1-6_01
Permanent employees (Employees with indefinite term contract)	persons	22 347	21 508	S1-6_7
o/w Male	%	74.5	74.7	S1-6_7
o/w Female	%	25.5	25.3	S1-6_7
Temporary employees (Employees with fixed term contract)	persons	1 934	1 602	S1-6_7
o/w Male	%	61.0	59.8	S1-6_7
o/w Female	%	39.0	40.2	S1-6_7
Number of employee who have left undertaking	persons	2 852	3 076	S1-6_11
Turnover rate	%	12.8	14.1	S1-6_12

Workforce breakdown by country /S1-6_04/	UNIT OF MEASURE	2024	2023	ESRS
Number of employees in Croatia	persons	8 453	8 340	S1-6_05
Number of employees in Hungary	persons	10 130	9 758	S1-6_05
Number of employees in Slovakia	persons	3058	2992	S1-6_05
Number of employees in Non-European Union countries	persons	377	365	S1-6_05
Number of employees in Other European Union countries	persons	1 618	1 655	S1-6_05

Employee data is based on annual sustainability data collection. Employee numbers are reported in head count and reflect year-end closing. Most representative number in the financial statement can be found in the Consolidated Financial Statements General information section.

METRICS RELATED TO DIVERSITY AND INCLUSION

/S1-9; S1-12/

ESRS	Disclosure Requirement S1-9, S1-12
GRI	GRI 405, 405-1

Diversity metrics

Gender distribution in top management*	UNIT OF MEASURE	2024	2023	ESRS
Number of male employees	persons	50	43	S1-9_01
Number of female employees	persons	4	4	S1-9_01
Percentage of male employees	%	92.6	91.5	S1-9_02
Percentage of female employees	%	7.4	8.5	S1-9_02

*Top management is defined based on HAY categories, positions graded as HAY24 or above are considered Top Management.

Age distribution of employees	UNIT OF MEASURE	2024	2023	ESRS
o/w below 30 years old	%	14.5	-	S1-9_03
o/w between 30-50 years old	%	54.6	-	S1-9-04
o/w over 50 years old	%	30.8	-	S1-9_05

Top management is defined based on HAY categories, positions graded as HAY24 or above are considered Top Management.

METRICS RELATED TO REMUNERATION (PAY GAP AND TOTAL REMUNERATION)

/S1-16/

Pay gap	UNIT OF MEASURE	2024	2023	ESRS
Rate of average base salary of women to average base salary of men	%	93.3	-	S1-16_01

Pay gap reflects the difference between average total monthly base salary of female and male employees.

Excessive pay	UNIT OF MEASURE	2024	2023	ESRS
Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees	number	96.3	-	S1-16_02

The indicator includes the median annual total remuneration of all employees at MOL Group's Hungary-based companies, INA d.d. and Slovnaft a.s. compared to the highest paid individual in MOL Group. The remuneration of the highest paid individual is based on the Remuneration Report of MOL Group and includes the total amount paid to the executive in the given year.

The ratio is not available for the median annual total remuneration for all MOL Group employees due to limitations in the data collection process.

METRICS RELATED TO INCIDENTS AND COMPLAINTS RELATED A FAIR, ETHICAL, INCLUSIVE WORK ENVIRONMENT

/S1-17/

ESRS	Disclosure Requirement S1-17
GRI	GRI 2, 2-25 GRI 2, 2-27 GRI 406, 406-1

Number of incidents of discrimination [table] /S1-17_01/

	UNIT OF MEASURE	2024	2023	ESRS
Incidents of discrimination	number	1	-	S1-17_02
Complaints filed through channels for people in own workforce to raise concerns	number	104	106	S1-17_03
Complaints filed to National Contact Points for OECD Multinational Enterprises	number	0	-	S1-17_04
Fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	HUF	0	-	S1-17_05
Severe human rights issues and incidents connected to own workforce	number	0	-	S1-17_08, S1-17_10
Severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	number	0	-	S1-17_09
Fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	HUF	0	-	S1-17_11

Complaints and incidents are managed through MOL Group's whistleblower system. More detailed description can be found in this chapter's Ethics subchapter. The number of complaints shows no significant difference from previous year's data.

AFFECTED COMMUNITIES

/S3/

INTRODUCTION

In our 2024 double materiality assessment, we have concluded that MOL Group has both positive and potential negative impacts on affected communities, and acknowledged that a lack of consultation or limited engagement can lead not only to adverse impacts on people, but can also materialize as financial risks for the company, such as to disruption to project planning or operations, delays, rising costs, legal challenges and the potential escalation of local issues to the national stage. Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report.

MOL Group is a major market player and employer with a sizeable operational footprint, working under special attention from stakeholders, especially from community interests in areas where MOL Group conducts its operations. Community engagement plays a crucial role for MOL Group, particularly in Downstream Production sites across the CEE and in Upstream operations in Pakistan, Hungary and Croatia. MOL Group currently operates four major Downstream Production sites: Danube Refinery located in Százhalombatta (Hungary), Rijeka Refinery located in Rijeka (Croatia), one integrated refinery-petrochemical facility located in Bratislava (Slovakia) and one petrochemical facility in Tiszaújváros (Hungary). All three of the Group's refineries are located in or near areas of dense population (measured as within 49 km of an urbanized area with a population greater than 50,000). A fourth fuel refinery located in Sisak (Croatia) was permanently closed in 2020 and is currently undergoing conversion to an alternative use. A smaller rubber bitumen manufacturing plant (aka. Zala Refinery) is located near Zalaegerszeg (Hungary).

MOL Group's refineries and petrochemicals sites play an important role in contributing to the local and state economy by providing employment opportunities, supporting suppliers, serving industrial customers as well as manufacturing products that are essential to everyday life. However, negative effects associated with petroleum refining are a cause of concern for nearby communities. Most concerns relate to air quality, as refineries and petrochemical plants create nuisance odors and air emissions from refining crude oil, directly affecting the quality of life of nearby residents. MOL Group works to balance local concerns with the desire for economic development, seeking to identify, avoid and mitigate potential negative impacts while developing long-term, positive relationships with the neighbouring communities.

The list of identified impacts and risks can be divided into two groups:

The first group relates to local communities living adjacent to the undertaking's operations:

- Disturbance from operations (IM-17)
- Operational hinderances and / or increased expenses due to community issues (RK-10)

Whilst, the second group relates to the macro-level economic impacts on the welfare of citizens:

- Corporate giving, donations, volunteering (IM-16)
- MOL Group as a taxpayer (IM-18)
- Secure employment on fair terms (IM-12) (see details in S1 - Sub-chapter A: Human Resource Management)
- Trainings and skills development (IM-14) (see in S1 - Sub-chapter A: Human Resource Management)
- Supply of critical products (fuel, electricity, convenience products) (IM-20) (see in chapter S4 - Consumers and end-users)

Since managing impacts and risk related to these two groups require different approaches, this chapter is divided into two sub-chapters to allow a more distinct understanding of MOL Group's policies, actions, targets and metrics associated with each group:

- **Sub-chapter A** focuses on how MOL Group manages impact on, and risks associated with local communities, primarily ones living adjacent to the company's operations. (IM-17, RK-10)
- **Sub-chapter B** focuses MOL Group's policies and actions relate to its macro-level impacts, such as shared wealth and MOL Group's economic impact. (IM-16, IM-18, IM-12, IM-14, IM-20)

SUB-CHAPTER A: MANAGING IMPACTS AND RISKS RELATED TO LOCAL COMMUNITIES

IMPACTS AND RISKS RELATED TO AFFECTED LOCAL COMMUNITIES

/S3. SBM-3/

ESRS	Disclosure Requirement S3.SBM-3
GRI	GRI 3-3-a GRI 413-2-a

The tables below details the identified impacts and risks related to local communities based on our 2024 double materiality assessment:

Table IM-17: Disturbance from operations

Severity	Moderate

Scope	Local level, relevant at all locations mentioned in the introduction section of this chapter
Likelihood	High
Description	MOL Group has 3 refineries, a petrochemical site around 2400 service stations and multiple drilling sites in the proximity of residential areas. Even with all possible pre-emptive actions, this can cause the disturbance of local communities via noise, light pollution and odours.
Actions	See in section 'Actions to manage impacts and risks related to affected local communities'
Time horizons	We consider the issue material on all time horizons, with the aim of reducing the disturbance to the lowest possible level.
Relevance in the value chain	Relevant related to all of MOL Group's operations where local communities are impacted, particularly in Downstream Production sites across the CEE and in Upstream operations in Pakistan, Hungary and Croatia

Table RK-10: Operational hinderances and / or increased expenses due to community issues

Type	Operational risk
Likelihood	Medium
Magnitude of financial effect	Low
Description	Industrial and retail activities of MOL Group are often conducted in the proximity of residential areas. MOL Group sustains a well-established system to communicate high-impact operations (via noise, light pollution and odors) and to receive and handle community grievances and invests in preemptive infrastructure to minimize disturbance. However, incidents, extreme weather events, turnovers, asset replacements and major maintenance can lead to increased noise, odors or light, entailed by reputation risks and/or increased cost in mitigation measures, or in extreme cases, hinderances in operations.
Related impact & dependencies	For information on related impacts on affected communities, refer to *IM-17 - Disturbance from operations*.
Mitigation actions	MOL Group mitigates the risk of hinderances with infrastructure development (e.g., noise walls, odor-reducing actions), informing the public on planned operations, grievance mechanism, public consultations and grants for housing improvements to help minimalize the disturbance.
Financial effect & time horizons	The financial effect of actions is calculated as expenses on corporate giving and donations for local communities and OPEX in relation to preemptive actions and measurements (financial effect of pollution prevention and remediation actions is covered in RK-05). Currently, these expenses do not reach the threshold financial materiality, but related figures are published in DR S3-4 for transparency.
Relevance in the value chain	Relevant related to all of MOL Group's operations where local communities are impacted, particularly in Downstream Production sites across the CEE and in Upstream operations in Pakistan, Hungary and Croatia

IM-16: Corporate giving, donations, volunteering – For further details, please refer to sub-chapter B: Shared wealth & economic impact

POLICIES RELATED TO AFFECTED LOCAL COMMUNITIES

/S3-1; S3-2; S3-3/

ESRS	Disclosure Requirement S3-1, S3-2 & S3-3
GRI	GRI 2-12 GRI 2-23 GRI 2-25 GRI 2-26 GRI 2-29 GRI 3-3 GRI 411-1

This section outlines the company's policies for managing significant impacts and risks concerning affected communities, including the processes for identifying, assessing, managing, and remediating these impacts. It details how MOL Group engages with these communities, incorporates their perspectives into its decision-making, and addresses potential and actual impacts through accessible channels for raising concerns.

General approach of managing impacts and risks related to affected communities

MOL Group's principles related to the economic, environmental, and social development of local communities and respect of human rights is outlined in section IV.6.2. of our Code of Ethics and Business Conduct, and in the HSE Social Impact Policy – both available on our website. In summary, these documents highlight Mol Group's commitment to:

- Make a positive impact while eliminating negative impacts on the communities in which we operate, and on society in general
- Continuously measure, evaluate and improve our HSE and social performance and communicate it openly to stakeholders, including local communities and civil society representatives who are affected by or have legitimate interests in our operations
- Promote a culture in which all MOL Group employees share these commitments and actively participate in initiatives that support local development

(For further details, please refer to full text of these documents via this link provided above.)

To monitor performance and inform management about progress, local communication teams forward half-yearly reports to Group Communications; whilst Group Communication reports at least annually to the Sustainable Development Committee and prepared an Annual Report on Community Engagement, and provides information for external reporting requirements.

Community Engagement

MOL Group has an integrated approach to community engagement and grievance management. The aim of this framework is to identify, assess and remediate potential negative impacts and manage risks (i.e. IM-17, RK-10) – as explained by the **Community Engagement Methodology** (internal document). This regulation provides the principles and practices of community engagement and the process of identifying and involving stakeholders and the high-level process for handling incoming grievances from the public, communities and local authorities. The processes are aligned with all regulations and instruments, including: ISO 9001:2015 and ISO 14001:2015 standards regarding requirements for stakeholder management, the AA1000 Stakeholder Engagement Standard (2015), and IPIECA's „Community grievance mechanisms in the oil and gas industry" standard. The key elements are also publicly available on our website in the Community Engagement Methodology Guide.

MOL Group's engagement with communities is based on principles of inclusivity, transparency, responsiveness, and accountability. The guide outlines a structured process for community engagement, which includes:

1. **Identify & analyse**: Identifying relevant stakeholders
2. **Design & plan**: Developing engagement plans that are tailored to the specific context and needs of the community.
3. **Implementation**: Conducting engagement activities
4. **Evaluate, report & update**: Assessing the effectiveness of engagement activities and making necessary adjustments to improve outcomes.

Engagement processes are structured to identify and analyse stakeholders, develop tailored engagement plans, implement various interaction methods, and evaluate outcomes. The company emphasizes building high-quality partnerships with communities to support business success and strategic objectives while mitigating and addressing potential impacts on local stakeholders.

MOL Group engages directly with affected communities, their legitimate representatives, or credible proxies, such as local non-profits, municipalities, and associations. Community Relationship Officers play a key role in maintaining continuous communication with stakeholders and addressing their concerns effectively. Obtained perspectives and concerns are actively sought to inform decision-making and manage potential and actual impacts. The insights gained shape consensus-based decisions and collaborative solutions to community-related issues. Special attention is given to identifying and addressing the perspectives of marginalized and vulnerable groups within affected communities. The company considers factors such as physical safety, environmental and health conditions, quality of life, and cultural or social cohesion. Proactive measures are taken when resistance or significant risks are identified, ensuring inclusive engagement and equitable outcomes. In case of ongoing operations, such as nearby major industrial site such as refineries and drilling sites, engagement happens on a regular basis. In case of other operations, such as site openings or closure, engagement must occur as early as possible in the lifecycle of the project. Engagement activities include public hearings, joint activities, and ongoing communication with authorities and stakeholders. The frequency and method of engagement are tailored to the specific context, ensuring alignment with community needs and the significance of operational impacts. Effectiveness is assessed through monitoring and evaluation mechanisms that ensure alignment with stakeholder expectations and the resolution of grievances. Feedback from communities and the outcomes of engagement activities inform continuous improvement. Documentation is localized based on the standardized Methodology Guide to address the unique socio-economic and environmental contexts of each site.

(For further details, please refer to full text of these documents via this link provided above.)

Grievances & remediation

Citizens, communities and local authorities have the right to raise a grievance claim if they have a concern, the source of which is potentially connected to the activities of MOL Group – including but not limited to issues related to disturbances, safety, environmental concerns, and potentially human rights concerns. **Community Engagement Methodology** and the **Guide** also sets the Group-level framework for grievance management. The system is established based on the foundations of Guiding Principle 31 in the United Nations (UN) 'Guiding Principles on Business and Human Rights', which is listing 8 effectiveness criteria: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue enabling effective remedy.
A key requirement of the policy is operating grievance channels accessible at all operational levels (on company / organization / site level, depending on frequency of concerns raised and cost-benefit analysis), ensuring that affected communities can raise concerns directly with

the sites impacting them, in the most convenient way possible. To ensure consistency and meeting Group-level requirements, all channels are also overseen by the Group Communication department. In 2024, the following channels were in operation:

- Each local communication team operates an official email channel
- Dispatcher Services: Sites with the highest operational impact (currently Danube Refinery, Slovnaft Refinery) operates 24/7 dispatcher services
- Online platforms: Danube Refinery and Slovnaft Refinery also operates mobile applications and is available on social media platforms that allow residents to submit concerns, receive updates, and access real-time information
- Furthermore, members of affected communities might also use the Group-level whistleblower system (SpeakUp!), as described in Section *S1-3-C: Policies related to grievances and remediation.*

The Group-level regulation on the handling of grievances require:

- All claims have a first response within 24 hours from the time it's received, except for non-automatic answers on weekends and public holidays (the first response can be an automatic or a template answer), that the company/site has received the request and will investigate the grievance.
- All grievances are registered in a dedicated system with a predefined structure on the local level. The lead time for responses is tracked, and performance is monitored through regular reports at both local and group levels. These reports inform annual evaluations to refine grievance handling processes and improve effectiveness.
- Every incoming claim must be evaluated locally, investigated and answered. If necessary, relevant mitigation actions and remedies must be defined and implemented in collaboration with relevant business units and functional areas (such as HSE). The Group-level regulation does not cover the actual business solutions to grievances, as these have to be developed and implemented by relevant business areas. Those details of the process, which is not covered by this regulation - specifications will be regulated on the appropriate local level.
- Every incoming claim and its details is reported as requested by Group Communications.

MOL Group has strict procedures in place to protect individuals who raise concerns via its channels:

- Grievances can be sent anonymously through the established channels, ensuring accessibility without fear of exposure.
- Grievance handling complies with data protection laws, ensuring confidentiality and respect for privacy. MOL Group adheres to stringent data protection rules, ensuring that grievances are treated confidentially. All personal data is processed in compliance with applicable laws.
- As stated in the Code of Ethics and Business Conduct, MOL Group will not tolerate any retaliation against people reporting compliance issues or raising concerns in good faith. Allegations of retaliation are handled by local Ethics Officer or the Group-level SpeakUp!, and appropriate actions will be taken (see section *S1-3-C: Policies related to grievances and remediation)*.

ACTIONS TO MANAGE IMPACTS AND RISKS RELATED TO AFFECTED LOCAL COMMUNITIES

/S3-4/

ESRS	Disclosure Requirement S3-4
GRI	GRI 2-24 GRI 2-25 GRI 3-3 GRI 203-2 GRI 411-1 GRI 413-1

MOL Group is a significant market player and employer with a substantial operational footprint. As such, it operates under close scrutiny from stakeholders, particularly regarding community interests in the areas where it conducts its operations. Members of the public and representatives of impacted groups expect to be informed, consulted, and involved in MOL Group's decision-making processes. A lack of consultation or limited engagement can lead to adverse impacts on people, disrupt project planning and operations, cause delays, increase costs, invite legal challenges, and escalate local issues to the national level.

Community engagement is a critical priority for MOL Group, particularly at its Downstream production sites in Central-Eastern Europe and its Upstream operations in Pakistan. Therefore, MOL Group pursues a strong collaboration with the communities, its partners in the supply chain as well as the regulators, ensuring the involvement of practically every layer of the society in the transition process not only as moral imperative but a strategic necessity for their continued success. The main aim of our actions in 2024 continued to be ensuring that community engagement practice including grievance mechanism and trainings is implemented in 100% of major operations, and that complaints – especially related to environment protection topics such as noise, odour, water and air quality being the most common ones – are minimised and operational hindrances are avoided. (IM-17, RK-10) Below are updates on community engagement efforts and grievance management across key locations.

Danube Refinery

- In 2023, MOL Group developed a mobile application, Hello Dufi, to provide real-time information to the local community surrounding the Danube Refinery. Launched in early 2024, this platform allows residents to submit comments, and MOL Group regularly shares news and updates about refinery operations. This initiative builds on the success of the Slovnaft refinery's Sused Slovnaft app, which significantly improved communication with the local community.
- By October 2024, the Hello Dufi app recorded 750 downloads and facilitated 524 grievances, mainly regarding noise, odour, flaring, and smoke. This increase in reported grievances reflects the app's effectiveness in enabling community feedback.
- MOL Group has enhanced continuous communication with local municipalities around Százhalombatta, fostering partnerships with residents and treating them as key stakeholders.
- In parallel, significant investments were made in 2024 to reduce odour sources and their impacts, addressing one of the most reported issues from the local community.

Bratislava Refinery

- By October 2024, 60 grievances were recorded compared to 69 for the entire previous year. The elevated number of complaints is linked to two major turnarounds in 2024, particularly affecting operations at the Ethylene unit.
- Noise-related grievances are primarily linked to flaring, which, though infrequent, is perceived as highly disruptive.
- MOL Group continues to strengthen communication with local communities, maintaining 24/7 availability and transparency. This approach has resulted in fewer grievances being escalated through local mayors.
- Communication efforts in 2024 included videos, PR articles, and updates to the Sused Slovnaft app. From January 2025, dispatching services will also play a role in promptly addressing community concerns.
- Noise reduction projects are underway, with technological upgrades currently in the testing phase. MOL Group is preparing for potential implementation based on these results.

Rijeka Refinery

- In 2024, six grievances were recorded (three related to the sea and three to air quality), compared to seven in 2023. The decline in sea-related grievances is attributed to remediation activities, including drilling new wells and extracting hydrocarbons to reduce their accumulation in the sea.
- Air-related grievances were primarily linked to the start-up of the refinery, which temporarily increased noise, smoke, and odour levels. Notifications were sent to local authorities and relevant agencies.
- To address noise-related grievances, MOL Group prepared an FEL-1 document outlining two key actions for 2025:
    1. Covering critical equipment on the 379 Claus 2 and 323 Vacuum Distillation units.
    2. Conducting noise-level measurements at locations where equipment was replaced during the 2024 turnaround.
- During the 2024 turnaround, four turbines were replaced with electric motors, and air coolers on FCC/HCU units were upgraded to reduce noise levels.

Upstream Croatia

- By October 2024, three grievances were recorded (two HSE-related and one non-HSE-related), marking a significant decrease from 2023 (10 HSE-related and three non-HSE-related grievances). The reduction is due to fewer workover activities near populated areas in 2024, which previously caused complaints about noise, odour, and smoke.
- MOL Group implemented the **Manage Community Engagement and Grievances** document, requiring quarterly grievance reporting by managers. This improved the grievance resolution process and encouraged the use of established mechanisms.

Sisak Site

At Site Sisak, two grievances were recorded in 2024. Following investigations, it was confirmed that neither was related to the site's operations. One grievance concerned air pollution, which was verified by environmental inspectors as unrelated to activities at Site Sisak. The second grievance involved pollution in the River Kupa, which was similarly found to be unconnected to the site's water management operations.

Upstream Pakistan

- In 2024, 52 grievances were recorded: 14 related to HSE and 38 to community matters.
- To mitigate grievances and enhance resolution, several actions were taken. Awareness-raising discussions were held with local communities before technical work began, informing them about potential impacts and fostering cooperation. The grievance

resolution process was strengthened through a collaborative approach with government support and active participation from relevant departments, leading to more efficient case closures.

A notable best practice at the Makori Deep-3 drilling location involved averting a potential armed conflict among local groups by forming a local committee, as directed by the Commissioner of Kohat Division. This initiative ensured smooth civil works and timely mobilization of the drilling rig, demonstrating the effectiveness of proactive community engagement.

Waste management services

In 2023 with MOHU starting its operation in Hungary the implementation of their integration to the Group level community engagement process has started.

TARGETS RELATED TO AFFECTED LOCAL COMMUNITIES

/S3-5/

ESRS	Disclosure Requirement S3-5
GRI	GRI 3-3

The most important key performance indicators to measure the effectiveness of our actions related to community engagement are the *Number of Relevant Operations with implemented Community Engagement Plan / Number of Relevant Operations* (%) and the *Number of Closed grievances /Number of Registered Grievances by stakeholders* (%). Since they are measured site by site, MOL Group has not implemented a formal Group-level target. Relevant information is disclosed in section 'Actions to manage impacts and risks related to affected local communities' above.

SUB-CHAPTER B: SHARED WEALTH & ECONOMIC IMPACT

IMPACTS RELATED TO SHARED WEALTH & ECONOMIC IMPACT

/S3. SBM-3/

Sub-chapter B focuses MOL Group's policies and actions relate to its macro-level impacts, such as the welfare of citizens, shared wealth and MOL Group's economic impact.

Impacts related to shared wealth & economic impact are the following:

Table IM-16: Corporate giving, donations, volunteering

Severity	Moderate
Scope	Local level, relevant at all locations mentioned in the introduction section of this chapter
Likelihood	Actual impact
Description	MOL Group contributes to the socio-economic progress in local communities in which it operates through several different channels, including volunteering, sponsorships, donations, and other forms of economic support. In 2024, MOL Group supported social investments in the amount of over USD 3.48 million in absolute terms (excluding leveraged donations derived from tax-base decreasing donation instruments).
Actions	See in section 'Actions related to shared wealth and economic impact'
Time horizons	We consider the matter material on all time horizons.
Relevance in the value chain	Relevant related to all of MOL Group's operations where local communities are impacted.

Table IM-18: MOL Group as a taxpayer

Severity	Significant
Scope	CEE
Likelihood	Actual
Description	MOL Group is a major company in the CEE region, therefore a key contributor to the budget of countries where it operates, especially in Hungary, Croatia and Slovakia. MOL Group contributes to the creation of public wealth to a significant degree.
Actions	'Actions related to shared wealth and economic impact'
Time horizons	We consider the issue material on all time horizons.
Relevance in the value chain	MOL Group as a taxpayer is material impact across all levels of MOL Group's value chain.

- IM-12: Secure employment on fair terms – see details in S1 - Sub-chapter A: Human Resource Management
- IM-14: Trainings and skills development - see in S1 - Sub-chapter A: Human Resource Management
- IM-20: Supply of critical products (fuel, electricity, convenience products) – see in chapter S4 - Consumers and end-users

POLICIES RELATED TO SHARED WEALTH & ECONOMIC IMPACT

/S3-1; S3-2; S3-3/

MOL Group's operations are guided by a strong commitment to ethical conduct, transparency, and social responsibility, as outlined in its **Code of Ethics and Business Conduct**. These principles are embedded in the company's approach to social investment, sponsorship, and donations, ensuring that MOL contributes meaningfully to the economic, environmental, and social development of the regions where it operates.

MOL Group actively invests in raising living standards and fostering social development in its operational regions. Beyond creating jobs, the company gives back to the communities by paying taxes and engaging in activities that enhance public health, culture, and education. These initiatives aim to create a more habitable environment and economically resilient communities, reinforcing MOL's role as a key contributor to societal progress.

Transparency is a cornerstone of MOL Group's financial and operational practices. The company pays taxes responsibly and in full compliance with all applicable laws and international regulations, including those related to transfer pricing. Responsible taxpaying is viewed as an integral part of MOL's social responsibility, and the same high standard is expected from all business partners across the value chain. This commitment underscores MOL's dedication to fostering trust and integrity in all its dealings.

MOL Group's engagement extends beyond financial contributions, as it actively participates in trade organizations, industry associations, and multi-stakeholder partnerships that promote the values of sustainable development (please see relevant disclosures in Sub-chapter G1-A). By identifying social and societal needs, MOL supports social enterprises and innovation as tools for addressing challenges. The company also encourages and facilitates volunteer activities among its employees, fostering a culture of social engagement that aligns with MOL's core values.

To enhance positive impacts (i.e. IM-16), **Managing Corporate Giving Activities Process Description** defines the Group-level processes related to sponsorship, donation and social investment activities in order to provide a comprehensive framework for the management of successful, efficient and transparent corporate giving activities within the company. Its key principles are available on our website under MOL Sponsorship and Donation, underpinning our corporate giving strategy, ensuring impactful, ethical, and sustainable contributions to society:

1. **Focus on Positive Social Impact:** We prioritize structured, goal-oriented programs that deliver significant social impact, focusing on children, talent development, disadvantaged groups, local communities, health, culture, sports, and environmental protection.
2. **Professionalism and Ethical Standards:** All decisions are guided by strict ethical norms (based on MOL Group's Code of Ethics and Business Conduct) and predefined strategic and professional criteria, supported by independent advisory committees. Supported partners are also expected to respect our core values, including human rights and the rejection of corruption and discrimination.
3. **Transparency and Accountability:** We maintain clear and regulated processes, expect adherence to transparency, and provide regular reports on our activities. Only programs with a transparent background are supported.
4. **Sustainability and Long-Term Value Creation:** Our support emphasizes sustainability, integrating economic, social, and environmental considerations to maximize long-term benefits.
5. **Cross-Border Engagement:** As an international company, our support extends to all countries of operation, tailored to local opportunities, needs, and resources.
6. **Community Involvement:** We encourage initiatives requiring active community participation and ensure that community interests are represented in decision-making.
7. **Promotion of Talent and Achievement:** We recognize and support young talents, ensuring funding reaches those most deserving and in need, as determined by professional evaluations.
8. **Focus on Practical Outcomes:** Preference is given to action-oriented programs over events or conferences, limiting the latter to 20% of total sponsorship activities.
9. **Support for Local Communities:** Emphasis is placed on initiatives benefiting communities within the MOL Group's operational areas.
10. **Non-Discrimination and Ethical Standards:** We refrain from supporting religious organizations, political activities, or any initiative conflicting with human rights, public morals, or ethical standards.
11. **Maximizing Efficiency and Synergies:** Resources are concentrated on fewer, impactful projects to ensure efficient use and greater overall effectiveness.
12. **Tax Efficiency:** Priority is given to support programs providing tax advantages, aligning with our financial strategy.
13. **Preparedness and Planning:** Only requests submitted at least three months in advance are considered, ensuring thorough evaluation and synergy exploration.
14. **Conflict of Interest Prevention:** MOL Group does not provide direct financial support to shareholders or employees to avoid conflicts of interest.
15. **Recognition of Quality and Excellence:** We support initiatives symbolizing quality and persistence, aligning with our ethos of achieving exceptional results through dedication.
16. **Incubator Effect:** We prioritize projects requiring initial support to ensure long-term sustainability once established.

17. **Corporate Responsibility and Profitability:** Our giving activities are linked to corporate profitability, with a commitment to allocate 1% of the MOL Group's average net business result over the past three years to such initiatives.
18. **Ethical Use of Resources:** Our preference is for in-kind support, such as fuel or gift cards, which aligns with our operational strengths.
19. **Merit-Based Selection:** Programs are primarily selected through open competitions and reviewed by professional panels to ensure fairness and alignment with societal needs.

In case of major projects affecting a wider society in the place of operation a Social Investment programme design should be carried out. Programme planning occurs simultaneously with the business project design itself. Based on the methodology defined in The Social Engagement Group Practice, before decision on an investment or abandonment project proposal sites/operations shall carry out a Social Impact Assessment to identify basic information and ideas about wider societal issues. A context study should also include an analysis of existing local opportunities to improve the Company's effectiveness or strategy execution. These could include: available human resources, government capacity, physical infrastructure (e.g. waste management, town planning, etc.) and local supplier/contractor capabilities.

ACTIONS RELATED TO SHARED WEALTH & ECONOMIC IMPACT

/S3-4/

MOL Group, as a leading company and major taxpayer and in the Central and Eastern European region, plays a pivotal role in fostering shared wealth and economic stability in the countries where it operates. Particularly in Hungary, Croatia, and Slovakia, MOL Group's substantial contributions to national budgets through taxes, royalties, fees, and other financial streams directly support public services, infrastructure, and social programs. By generating significant economic value, the Group enhances public wealth, benefiting governments, communities, and stakeholders alike.

Financial contributions are extensive and include taxes, mining royalties, rental expenses, wages, salaries, social security payments, and employee benefits. These contributions form a cornerstone of economic development in the regions where MOL operates, ensuring the funding of essential public services such as healthcare, education, and infrastructure. The scale and impact of these payments are detailed in MOL Group's Financial Consolidated Statements, specifically in sections on Total Operating Expenses and Income Taxes. Additionally, the company's annual "Payments to Governments" report (in line with Chapter 10 of EU Directive 2013/34/EU and Chapter VI/A of Hungarian Accounting Act C of 2000) provides a transparent breakdown of its fiscal contributions, underscoring its role as a responsible corporate entity committed to supporting national and regional economies.

As one of the largest employers in the regions where it operates, MOL Group's economic impact extends beyond taxation. The company's provision of secure, long-term employment is a critical component of its socio-economic influence (IM-12). MOL ensures its employees are treated with respect, fairly compensated, and supported through comprehensive benefits that promote well-being and stability. This approach not only provides financial security to employees and their families but also drives local economic activity, as wages and salaries are reinvested into surrounding communities. In regions facing economic challenges, MOL's presence helps to reduce unemployment and create a stable foundation for economic development. See more details in S1 - Sub-chapter A: Human Resource Management.

In alignment with its broader ESG strategy, MOL Group integrates sustainability into its operations, further amplifying its positive impact. This includes sustainable procurement practices that prioritize local suppliers, reducing environmental impacts and fostering stronger community relationships. By considering logistics-related costs and emphasizing local partnerships, procurement framework supports regional development while achieving operational efficiency. Furthermore, MOL Group ensures the continuous supply of critical products, such as fuel, electricity, and convenience products, which are essential for maintaining societal and economic stability (IM-20).

Social investments are another vital aspect of the company's contribution to shared wealth and economic development. The company is committed to enhance its positive effect on the socio-economic progress in local communities in which it operates via effective actions, including volunteering, sponsorships, donations, and other forms of economic support (IM-16). As a key example, MOL Group collaborates with the Hungarian Food Bank Association. In 2024, this partnership saved more than 14 tonnes of surplus food from service stations, effectively preventing over 35 tonnes of CO_2 emissions, as estimated by the FAO Food Wastage Report. This initiative reflects MOL's dedication to reducing waste and mitigating environmental impact while supporting those in need.

In 2024, one of our most important Group level corporate social responsibility initiatives was the Green Belt Program, which exists in 6 countries in order to support local communities to create public green spaces. Since 2005 nearly 1800 initiatives were supported, 3,2 million square meters green areas were renewed, 389,540 trees, flowers and shrubs were planted in worth of more than USD 5.9 million. Another important initiative is the Talent Support and Child Healing Program, which exists in 3 countries. Since 2006 we helped more than 10,434 young people in the fields of sports, classical music and sciences for USD 5.8 thousand. Also, MOL's partnerships with hospitals and organizations in Croatia and Romania improve the quality of life for children with chronic illnesses and disabilities, further demonstrating its commitment to social responsibility.

TARGETS RELATED TO SHARED WEALTH & ECONOMIC IMPACT

/S3-5/

Published in its Shape Tomorrow Strategy, MOL Group has a target of ensuring that at least 50% of social investments are spent on local communities by 2030. Social investments are defined as the voluntary contribution of companies to communities located near their operations and to society at large with the aim to support external stakeholders in their fields of interest, typically through transfer of knowledge, skills or resources. Interim progress towards the target is not published. In 2024, MOL Group donated 1,270 million HUF in total in cash, in-kind giving or leverage. The amount does not include sponsorships.

CONSUMERS AND END-USERS

/S4/

INTRODUCTION

As an integrated oil and gas company, MOL Group's primary end-user base is the consumers attending our service stations. Consumer Services segment of MOL Group is a leading fuel retail operation in the CEE region, with a 10 million retail customer base and one million daily transactions. The success and profitability of the current Consumer Services business have been defined by fuel retailing for the past 75 years. Despite healthy growth of fuel consumption in Central Eastern Europe in the past several years, advancements in technology and new consumer habits have fundamentally changed what has so far been considered fuel retailing. MOL Group, realising the need to adjust to this new environment, made a core part of its 2030 strategy to transform its retail operations by tapping into growing areas of consumer demand and take part in the reinvention of transportation in CEE. Therefore, MOL Group considers its core consumers base "people on-the-go", rather than only end-users of our fuel and other oil products.

This chapter focuses on how the impacts on this core consumer base are managed, and opportunities related to the expanding mobility services offered by the company.

IMPACTS AND OPPORTUNITIES RELATED TO CONSUMERS

/S4. SBM-3/

ESRS	Disclosure Requirement related to SBM-3_01, SBM-3_01, S4.SBM-3_01 to S4.SBM-3_08

In our 2024 double materiality assessment, we identified 4 impacts and 2 opportunities which specifically relate to our core consumers base – "people on-the-go" – as defined in the Introduction section of this chapter. We concluded the topic *Consumers and end-users* to be material from both impact and financial perspective. Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report. This section outlines the impacts and opportunities associated with the Retail and Consumer services segment of MOL Group:

Table IM-20: Supply of critical products (fuel, electricity, convenience products)

Severity	Significant, actual positive impact
Scope	Regional (Central-Eastern Europe)
Likelihood	Actual
Description	MOL Group is a key supplier of fuel & energy (both for wholesale and retail customers) in the CEE region (leading regional network: among top 3 players on 100% of its retail network) and operates ~2400 services stations providing fuel (including close to 300 electric charging points) and convenience products and services not only in urban areas and alongside highways, but often in remote areas where access to fuel for rural communities would not be available otherwise.
Actions	MOL Group is dedicated towards continuing to fulfil consumer demands during regulatory changes, market turbulences and potential crises.
Time horizons	We consider the matter material on all time horizons.
Relevance in the value chain	The impact is material for the Consumer services segment, in all 10 countries where MOL Group operates service stations.

Table IM-21: Consumer health & safety

Severity	Moderate
Scope	Local
Likelihood	Medium
Description	MOL Group operates over 2400 service stations mainly via partners or contractors. The offered products at fuel stations, such as fuels and chemicals can be hazardous to health and safety, posing potential risks on consumers, workers and on nearby communities even with strict safety regulations. This is managed with proper staff trainings, shared important information for customers and always compliant assets, operations and goods. On the other hand, service stations have properly trained personnel, who therefore are capable of providing assistance and first aid (including more than 130 defibrillators) - which can be especially crucial in remote areas, such as next to roads and highway, where help would not be available in close proximity otherwise. Additionally, many stations are equipped with life saving devices like automatic defibrillators as well, ensuring the intervention in special cardiovascular catastrophic situations on these remote areas too.
Time horizons	We consider the matter material on all time horizons.
Relevance in the value chain	The impact is material for the Consumer services segment, in all 10 countries where MOL Group operates service stations.

Table IM-22: Providing sustainable mobility services

Severity	Moderate positive impact
Scope	Country level (Hungary, Slovakia) / potentially regional (Central-Eastern Europe) in the future
Likelihood	Actual
Description	Beyond traditional retail, MOL Group is embracing changes in transportation by tapping into growing areas of consumer demand. MOL Group's mobility services include car sharing (MOL Limo's fleet of ~450 cars of which over a third is fully electric); bike sharing (in Budapest & Bratislava); fleet management (MOL Fleet Solution manages vehicles used by MOL Group and external clients) & public transport (operating over 300 buses in Hungary through a joint-venture).
Time horizons	We consider the matter material across all time horizons, to an increasing extent.
Relevance in the value chain	The impact is material for the Consumer services segment, in all 10 countries where MOL Group operates service stations.

Table OP-06: Shared economy services

Maturity	Implemented at scale
Likelihood	Low
Description	MOL Group supports sustainable transportation options by investing in car-sharing (MOL Limo) and sponsoring bike-sharing services (Bubi, Bajk), promoting energy-efficient modes of travel and reducing the carbon footprint associated with personal vehicle ownership.
Related impacts, risks and dependencies:	Impacts of MOL Group's early entrance to this emerging sustainable market are providing sustainable mobility services (IM-22) fostering the transition to a low carbon economy (IM-01). It also contributes to reducing climate change related risks (RK-01, RK-02).
Financial effect & time horizons:	Investments and EBIDTA from sharing economy services makes the financial effect of this opportunity „medium". It is considered financially material in all time horizons, but mainly on the long term due to its increasing significance.
Relevance in the value chain	The opportunity is material for the Consumer services segment. Currently car sharing (MOL Limo) and fleet management services (MOL Fleet) are provided in Hungary, while Mol Group supports bike sharing in Budapest, Hungary (MOL Bubi) and in Bratislava, Slovakia (Bajk). In the future, MOL Group's aim is to expand these services to other municipalities and countries, with the goal of becoming one of the primary sources of mobility solutions and innovations in the region.

Table OP-07: E-charging network

Maturity	Implemented at scale
Likelihood	Low
Description	By investing in e-charging infrastructure, MOL Group supports the growth of electric vehicles, contributing to the reduction of greenhouse gas emissions in the transportation sector, and also enters into a growing market. Besides increasing the current number of MOL Plugee-branded electric chargers at service stations, together with other partners of the NEXT-E consortium, MOL Group have installed over 300 EV chargers along main highways in the Czech Republic, Slovakia, Hungary, Slovenia, Croatia and Romania.
Related impacts, risks and dependencies:	Impacts of MOL Group's investment in the development of the regional e-charging network are providing sustainable mobility services (IM-22) fostering the transition to a low carbon economy (IM-01). It also contributes to reducing climate change related risks (RK-01, RK-02).
Financial effect & time horizons:	Investments and EBIDTA from e-charging network makes the financial effect of this opportunity „medium". It is considered financially material in all time horizons, but mainly on the long term due to its increasing significance.
Relevance in the value chain	The opportunity is material for the Consumer services segment. MOL Group currently operates close to 300 electric chargers across 6 countries Central-Eastern-Europe.

POLICIES RELATED TO CONSUMERS AND END-USERS

/S4-1; S4-2; S4-3/

In line with the business and sustainability strategy of MOL Group, the main objectives of the internal policies in the field of Retail and Mobility (together referred to as Consumer Services) are to meet the changing consumer needs whilst minimising the negative environmental effect, support the transition towards sustainable mobility and transport, whilst ensuring profitability and business continuity on the long term. MOL Group's policies ensure a structured approach to managing impacts and opportunities related to consumers through a focus on sustainability, operational reliability, and innovation.

The highest-level process-based policies of the Consumer Services segment -supervised by the Group Consumer Services Vice President - are the **Retail Area Book** and the **Mobility Area Book.** Processes described in these documents must be applied at all MOL Group companies providing Retail and/or services by channelling them into local and operation specific Process Descriptions.

In the Retail segment, a key priority is ensuring the availability of critical products and services, including fuel and convenience goods at all times and all locations (IM-20). This must be implemented with processes related to local supply chain management - responsible for product availability – and efficient inventory optimization. This commitment reflects the company's critical role in the CEE region.

In the Mobility segment, policies must focus on not just following but driving the trend towards innovative and sustainable mobility solutions in line with the Shape Tomorrow strategy's objectives. The Mobility Area Book declares that new trends in the market for mobility services shall be continuously researched even beyond the scope of existing mobility businesses to monitor potential market entry strategies. New mobility-related business opportunities and possible innovative approaches to customers shall be identified, innovative solutions and new business lines shall be explored. Clear, regularly monitored targets and KPIs must be set to ensure continuous investments in electric vehicle charging infrastructure and support for providing alternative fuels and shared transportation options. These are crucial to promoting the transition to a low-carbon economy (IM-01; IM-22; OP-06; OP-07) whilst meeting changing consumer demands.

HSE compliance is also central to these efforts, with strict operational standards, regular staff training, and the provision of life-saving equipment such as defibrillators to ensure safety at all service stations (IM-21). Sustainability is a cornerstone of MOL Group's operations. The Group Retail organization has committed to conscious waste management, recycling and increased energy efficiency to support reaching MOL Group's carbon reduction goals.

MOL Group integrates consumer perspectives into its strategic and operational decisions through comprehensive policies designed to prioritize consumer insights. Regular consumer engagement combined with business data provides a holistic understanding for stakeholders, supporting the actionable insights that address specific consumer needs and ensure adaptability to changing consumer expectations. Retail customer's insights are systematically collected to overall customer satisfaction through a number of channels. On Group level, the most important channels are as follows:

- A comprehensive customer insight system known as Brand Tracking is used for the ongoing monitoring of our customers' behaviours on a monthly basis through. This system is operational across seven countries, encompassing a total of 3,000 customers per country, resulting in a cumulative 21,000 participants within MOL Group. Monthly data collection, amounting to

250 customers per month per country, is a fundamental aspect of this process. Brand Tracking provides invaluable data pertaining to brand awareness, usage patterns, overall brand performance, and 25 distinct key performance indicators (KPIs) related to fuel, gastronomy, store hygiene, loyalty programs, and staff behaviour. These insights inform the development of country-specific action plans while an important part of this tracking evaluates the effectiveness of our primary campaigns enabling continuous enhancement of their efficiency.

- Emphasizing our commitment to quality, we put significant emphasis on ongoing product quality enhancement initiatives, facilitated by a series of rigorous product tests. For instance, our fuel quality assessments involve collaboration with DTC Austria, while blind taste tests conducted by third-party agencies evaluate key gastronomy offerings.
- To gain deeper insights into the evolving needs of our loyal customers and respond promptly to their changing habits, we have implemented an internal research system (e.g. Rate My Shopping initiative) to obtain rapid feedback from members of our loyalty programs. The continuous refinement of our offerings and loyalty functionalities are informed by these insights. The customer loyalty program constitutes a key element in the digital transformation of Consumer Services. MOL MOVE, the digital, gamified, tier-based rewards program has been introduced in 8 markets already (Croatia, Slovenia, Hungary, Czech Republic, Slovakia, Romania, Serbia and Poland). The platform enables MOL Group to provide personalized and highly automated communication with an omnichannel approach, currently with 4,5 million active users across our CEE network.
- Regarding the handling of general consumer complaints, MOL Group does not have unified policy. All retail stations are expected to operate their own system of handling consumer complaints following local legal requirements. In case a consumers concerns are not addressed on local level, consumers are encouraged to use the Group-level **SpeakUp!** mechanism accessible for all internal and external stakeholders for advice or to raise concerns ("whistleblowing"). Reports can be made anonymously and will be treated as confidential, without risk of reprisal. For further details, please refer to Section S1-C: Policies of this report.

ACTIONS RELATED TO CONSUMERS AND END-USERS

/S4-4/

In 2024, MOL Group continued to implement targeted actions to achieve business goals in line with the strategy and policy objective, including measure to addressing the identified impacts and opportunities.

- **The retail segment** invested USD 113.4 million in 2024, prioritising the delivery of critical products with superior quality (IM-20) and maintaining our service station network of nearly 2,400 locations across ten Central Eastern European countries, ensuring accessibility and reliability for millions of consumers daily. In 2024 we continued offering enhanced EVO Plus fuels featuring the EVO Plus Triple Effect, which ensures better engine performance, lower emissions, and longer engine life; and further developed our e-charging network. Energy consumption for all EV chargers in 2023 reached 2,4 GWh, saving a total of 1.800 tonnes of CO2-eq in 2024 Jan-Nov period the CO2eq total saving is 1.600 tonnes.
- **The mobility segment** invested USD 60.2 million in 2024, advancing toward a cleaner and more efficient mobility ecosystem:
    - **Electric charging network:** In 2018, MOL Group launched MOL Plugee, a new EV charging brand under the Consumer Services division. By year end 2024, 278 MOL Plugee EV chargers were installed throughout the Group's service station network across the CEE region. In 2024 MOL Group installed 5 ultra-fast and 5 DC charger solutions on 6 existing and on 2 new locations in Hungary. MOL Group launched its application-based service in Hungary in 2020 and in Slovenia, Slovakia, Czech Republic, Croatia and Romania in 2021. At the end of 2024 it enabled our more than 55,000 registered Plugee users and other customers to have a seamless charging experience in 6 countries thanks to the late summer introduced European roaming activity. Next to the European roaming, this year MOL Plugee launch the virtual fuel card for B2B partners which highly supports the electrification of the business sector. Energy consumption for all EV chargers in 2024 reached 2,200 MWh, saving a total of above 660 tonnes of CO2-eq.
    - **Car sharing:** MOL Limo is the largest car-sharing service in Budapest with a fleet of 450, of which one third is electric. Every shared car expected to replace 5-10 private cars thereby MOL Limo is supporting the UN's SDG 12 on Responsible Consumption. To motivate users for sustainable transportation solution, every MOL Limo monthly subscription is automatically accompanied by MOL Bubi monthly subscription.
    - **Bike-sharing:** MOL Bubi (in Budapest) and Slovnaft Bajk (in Bratislava) bike-sharing services are also supported by MOL Group to promote emission-free and healthy mobility.
    - **Fleet Management:** The average age of our managed fleet remained under three years, significantly reducing CO2 emissions compared to the Hungarian national average vehicle age of 16 years. It is available for Plugee users to charge fleet vehicles with fleet cards, so our fleet solutions are ready to serve both electric, hybrid and ICE vehicles as well. In 2024, the electric fleet's energy consumption reached 70.000 kWh, saving a total of 50 tonnes of CO2-eq.

In 2025 and beyond, MOL Group remains committed to expanding its sustainable mobility initiatives, focusing on electrification, hydrogen-based solutions, and fleet management innovations.

- As part of these efforts, MOL Group will introduce additional electric and hybrid vehicles to its MOL Limo fleet, further enhancing urban mobility with lower-emission transport options.
- In January 2024, MOL Group signed strategic agreements with Hungary's three largest public transport and freight companies—Volánbusz, MÁV, and Waberer's—to foster the development of hydrogen-based mobility solutions. This collaboration aims to stimulate the domestic green hydrogen market and lay the groundwork for broader adoption in public and commercial transportation.
- In November 2024, MOL Group reached an agreement with Mercarius Flottakezelő, one of Hungary's largest and fastest-growing vehicle fleet management companies. Under this agreement, MOL Fleet Solution and Mercarius have established a joint holding company, MOL Mercarius, which will become the second-largest player in the Hungarian fleet management market, managing more than 20,000 vehicles. This collaboration aligns with MOL Group's long-term strategy to strengthen its fleet management capabilities while promoting sustainable and efficient mobility solutions.

We did not identify any significant, systematic negative impact on our consumers. In line with our policies, customer satisfaction is continuously monitored. In 2024, we continued to enhance the "Rate My Shopping" initiative, a key consumer engagement programme with the aim of maintain high-quality service standards across the network our service stations. Through real-time feedback collection, customers provide immediate evaluations of their experiences, allowing MOL Group to monitor satisfaction levels and identify areas for improvement. Feedback is analysed continuously, enabling the identification of service stations with recurring low scores or complaints. These stations undergo a thorough review, with collaborative discussions involving partners and station hosts to address weak points, share good practices, and develop targeted action plans. Written feedback is reviewed regularly to ensure swift responses to suggestions and resolution of identified issues. The initiative is closely integrated with MOL Move, the company's customer service platform, to manage complaints effectively. Critical complaints, such as financial discrepancies, ethical violations, cleanliness concerns, HACCP issues, and product or service unavailability, are flagged for immediate attention. Area Sales Managers are notified to align field actions, and customers receive official responses to ensure accountability and transparency.

The *eSMILE* - launched in 2020 - is a flagship training and development programme for over 19,000 service station employees. This digital microlearning platform covers product knowledge, consumer care, compliance and safety aspects. It ensures improved customer interactions through skilled and confident staff, timely updates during events (pandemic situations) ensuring safety, and the proactive service approach introduced with the *Customer Service Protocol*. The platform also accelerates onboarding for new hires, enhancing their readiness. By fostering employee engagement and upskilling, *eSMILE* improves customer satisfaction and supports the transformation of MOL's service stations into modern FMCG hubs.

Protection of the health and safety of our customers visiting our service stations in an outmost priority. (IM-21) This is ensured by sustaining capabilities to provide assistance and first aid for those on their way. In 2024, and over 133 service stations are equipped with defibrillators and personnel trained in providing first aid at most service stations (over 90% in Hungary, Slovakia, Czech Republic, Croatia and Slovenia).

EXCLUDED DISCLOSURE REQUIREMENTS FROM SOCIAL STANDARDS

Topic	Relevant IDs	Explanation
Human rights abuse, Forced labour, child labour, modern slavery and human trafficking	S1.SBM-3_07 – 10 S1-1_06 S1-1_08 S1-2_05 S1-17_14 S2 – all disclosures S3-1_03 S3-1_05 S3-1_07 S3-4_11	MOL Group exposure to the risk of incidents of human rights abuse, forced labour, child labour, modern slavery and human trafficking is relatively minor given that most of the Group’s activities are performed in European countries. Nevertheless, MOL Group is committed to lawful and fair employment and to respecting labour principles. MOL Group also expects the same from business partners and external stakeholders. MOL Group will not tolerate any form of forced, compulsory, bonded or child labour or any other kind of unethical employment practice such as withholding wages, denying sick leave or daily rest, abuse of alternative employment forms or evasion of health care contributions. We ensure that these forms of labour and slavery, servitude, and human trafficking do not take place within our business and supply chains. To further improve social risk management in the supply chain, MOL Group’s Procurement organization will implement conduct an in-depth supply chain screening in line with the Hungarian *Act CVIII of 2023 on the rules of corporate social responsibility considering environmental, social, and societal aspects to promote sustainable financing and unified corporate responsibility, and on the amendment of related laws* until June 2025.
Impacts on indigenous peoples	S3-1_01 S3-2_07	Disclosures related to impacts on indigenous peoples are excluded, as the topic is not material. Neither MOL Group CEE operations, nor its International Upstream operations located adjacent to indigenous peoples’ communities. Nevertheless, MOL Group committed to protecting indigenous peoples’ rights (based on the UN definition) under its Code of Ethics and Business Conduct.
Opportunities related to social standards	S1-4_07 S2-4_09 S3-4_09	Although we acknowledge that to realise any business opportunities, human resources and the support of local communities are key enablers, we did not categorise any of the identified opportunities directly into these topics.
Target setting - Workforce' representatives	S1-5_01 S1-5_02 S1-5_03	Workforce' representatives are informed about the results of tracking performance against targets (i.e., employee engagement rate, TRIR guidance, completion of annual ethics training,) but no documentation is available on consultations with workforce' representatives.
Awareness & trust in channels to raise concerns	S3-3_14	Currently there is no Group-level information available on the a assessment of awareness and trust in processes related to affected communities
Vulnerable / marginalised consumers and end-users	S4-2_06	Impacts we have identified for Consumers and end-users are positive impacts, and MOL Group has not identified consumers and end-users that may be particularly vulnerable to impacts or marginalised. Therefore disclosure requirement is omitted.
Targets related to consumers & end-users	S4-5_01 S4-5_02 S4-5_03	Due to the nature of the target, no direct engagement with consumers and end-users was conducted.
Resources allocated to management of material impacts	S1-4_09 S2-4_12 S3-4_12 S4-4_12	In case of social impacts, resources allocated to managements cannot be reliably estimated. Development of methodology is under consideration.

DISCLOSURES ON GOVERNANCE STANDARDS

INTRODUCTION

In our 2024 double materiality assessment, we identified the following impacts and risks related to governance[36]:

- Key regional business partnerships (IM-09)
- Risk of unfair business conduct (IM-10)
- Risk of fraud (RK-11)
- Risk of Information & cyber security incidents (RK-12)

As a result, we concluded the topic Governance to be material from both impact and financial perspective. Description of the methodology and consultations conducted are described in section ESRS 2 IRO-1 of this report.

These impacts and risks can be categorised into 3 groups, each requiring specific expertise, policies, actions and approaches to be managed. Therefore this chapter is divided into the following 3 sub-chapters outlining specificities of each group:

- **Sub-chapter A** outlines MOL Group's approach to ethical business conduct, describing policies and metrics related to fraud prevention and lobbying (IM-10, RK-11).
- **Sub-chapter B** describes how MOL Group ensures fair treatment of suppliers focusing on payment practices (IM-09).
- **Sub-chapter C** provides a general overview on MOL Group's cyber & information security approach (RK-12).

Each sub-chapter starts by providing a detailed description of IROs relevant for the topic, then details of the policies, actions, targets and metrics to outline how these IROs are managed by MOL Group.

SUB-CHAPTER A: BUSINESS CONDUCT

IMPACTS, RISKS & OPPORTUNITIES RELATED TO BUSINESS CONDUCT

/G1. IRO-1/

As an operator in a high-risk industry, MOL Group is committed to monitor, manage and maintain its risks related to business conduct within acceptable limits, with continuous risk monitoring. Fraud incidents, including corruption, bribery, and lack of transparency in business conduct, can have adverse consequences for our stakeholders and also embodies financial risks for the company. Through our double materiality assessment, we have identified both of these aspects: the stakeholder impact is addressed under the 'IM-10: Risk of Unfair Business Conduct,' while the financial risk implications are captured by 'RK-11: Risk of Fraud.' - as described in the tables below:

Table IM-10: Risk of unfair business conduct

Severity	Moderate, potential negative impact
Scope	Regional (Central-Eastern Europe)
Likelihood	Low
Description	Being one of the biggest companies in the CEE region, MOL Group is in possession of significant corporate power. Misconducts of individuals or organisations exercising corporate power is documented as a potential source of adverse impact on society, democratic processes, business partners, workers, local communities, stockholders, consumers and on the environment. Therefore, MOL Group prioritises the establishment and reinforcement of its ethics management system to ensure integrity and transparency.
Mitigation actions & remediability	MOL Group implements several mitigation actions to ensure ethical practices. These include adherence to a Code of Ethics and Business Conduct, internal protocols and mandatory trainings, ongoing monitoring and investigation of ethical breaches, and a publicly available whistleblower reporting system (Speak Up!). Additionally, MOL Group enforces stringent internal and external ethical expectations throughout its supply chain. In case of detecting a misconduct, MOL Group takes responsibility and ensures the remediation of affected parties to the fullest possible extent.
Time horizons	We consider potential impact material on all time horizons.
Relevance in the value chain	We consider potential impact material in relation to all of our value chains.

[36] Although we acknowledge that to realise any business opportunities, having solid corporate governance practices is a key enabler, we did not categorise any of the identified opportunities into G1 – Governance.

Table RK-11: Risk of fraud

Type	Other (Fraud)
Likelihood	Low
Magnitude of financial effect	Medium
Description	Fraudulent activities (external & internal fraud) may cause significant financial and reputational damages.
Related impact & dependencies	For information on related impacts, refer to *IM-10 - Risk of unfair business conduct.*
Mitigation actions	MOL Group mitigates the risk of incidents by dedicated teams and control functions on local and group level and increasing awareness by mandatory trainings and regular newsletter.
Financial effect & time horizons	Financial effect of the risk is not quantifiable, but the topic is considered material (medium) due to the severity of potential risks on all time horizons.

POLICIES RELATED TO BUSINESS CONDUCT

/G1-1/

Ethics and governance practices are essential to ensure that the company understands and mitigates the sustainability risks of its operation and is able to manage those risks. It contributes to improving MOL Group's financial position while maintaining its authenticity and validity to investors and operating as "good corporate citizen". This section outlines the company's principles, commitment, procedures on business conduct, detailing how it prevents, identifies, assesses, manages, and addresses related impacts (IM-10) and risks (RK-11). MOL Group prioritises the establishment and reinforcement of its business conducts and corporate ethics management system. The key principles of this system are laid in the **Code of Ethics and Business Conduct**:

Free and Fair Trade and Competition

MOL Group is dedicated to practicing fair market behaviour; its activities on the market must be conducted in accordance with the norms of fair competition and the spirit and letter of applicable competition law. Fully complying with competition law is not only a legal obligation but is related to attitudes and cultures that can positively impact a company's business. The aim of MOL Group´s Compliance plan is to raise awareness of our employees and to eliminate legal risks, thus supporting the effective implementation of business strategies in a legal way.

Group Compliance organization has a constantly adjusted scope to the changing regulatory and business environment (Group Compliance Plan), which focuses on those compliance risks that require engagement on corporate level, e.g. competition law, consumer protection, personal data protection rules and international trade restrictions and to prevent insider trading and anti-money laundering. These areas may bring high potential consequences (fines, reputational risks, behavioural remedies etc.). Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing trainings to increase awareness. Group Compliance has its dedicated experts. In-house investigations aiming at monitoring compliance with internal and external commitments are being performed.

Anti-Corruption and Anti-Fraud

MOL Group does not engage in and does not tolerate corruption in any form (including bribery, facilitation payment, kickback, extortion, misuse of authority for personal gain, undue benefits or gifts with the intent to influence), whether in the private or public sector on any scale. We maintain this view, even if our commitment to this policy places MOL Group in a non-competitive business position, or if speaking up against such activity results in MOL Group losing business. Throughout our entire value chain, within our social patronage, charity and sponsorship fields, we are committed to a zero-tolerance policy when it comes to corruption & bribery. Fraud, including the falsification of records of financial or non-financial information, money-laundering and insider dealing are prohibited.

Corporate Loyalty

Mol Group acknowledges its responsibility to protect shareholder investments and provide long-term returns that can compete with those of other leading companies in the industry. To ensure this, avoiding conflicts of interest, the protection of the company's interests, assets, business secrets, intellectual property, and ensuring data security are key priorities.

Trustful Business Relations and Responsible Stakeholder Relations

MOL Group is committed to extend the spirit and practice of responsible and sustainable business along the entire value chain and strive to have business relations based on trust and responsible communication with our external stakeholders.

For further details, please refer to the full text of MOL Group's Code of Ethics and Business Conduct, available online (in 13 languages) and accessible across the entire Group. In adherence to internal protocols, all of MOL Group must be acquainted with the Code and undergo annual compulsory trainings to ensure comprehension and compliance, with ethics integrated into the annual training curriculum also for the Board of Directors and the Supervisory Board. In 2024, 98% of MOL Group employees successfully completed their Annual Ethics training. Additionally, the Board of Directors and the Supervisory Board received their required training during meetings.

MOL Group also has stringent expectations for its partners, including suppliers, service station operators, joint ventures, and sponsors, urging them to align with the principlesin MOL Group's Business Partner Code of Ethics. This commitment to ethical business practices extends throughout the supply chain, with partners expected to propagate and enforce these standards among their own network of suppliers, subcontractors, and associates. All supplier and sponsorship contracts contain reference to the **Business Partner Code of Ethics** or other requirements on ethics values. If norms of the MOL Group Business Partner Code of Ethics are permanently and substantially breached, MOL Group will terminate its business cooperation with the business partner concerned.

The highest process-based policy establishing MOL Group's governance framework to identify, report, and investigate concerns about unlawful behaviour or violations of its **Code of Ethics and Business Conduct** is the **Security Area Book** (minimum disclosure requirements reported in section S1-B) in case of anti-fraud and internal investigation related issues**.** It defines fundamental rules and principles for anti-fraud and investigation services, ensuring consistency and control across the organization. MOL Group investigates business conduct incidents promptly, independently, and objectively, guided by a set of established principles

- **Clear Reporting Channels**: MOL Group provides accessible channels for employees to report concerns or violations, ensuring these mechanisms are widely communicated and understood across the organization. In order to ensure the lawful and ethical operation of MOL Group, the SpeakUp! whistleblower system has been established in 2006 to report violations of the Code, which are assessed by the Ethics Council. In case a report is identified to have relevance related to business misconducts, such as bribery or corruption, the case is forwarded to the Group Anti-Fraud & Investigation organizations to investigate. For further details, please refer to Section S1-3-C on Policies related to grievances and remediation.
- **Defined Responsibilities:** Group Anti-Fraud & Investigation organizations operate the system of internal investigations of MOL Group according to the annual fraud risk assessment plan acknowledged by senior management. Internal Investigation and Anti-fraud Teams conduct high priority, highly sensitive investigations as a group service to prevent and expose illegal criminal activities and protect the company from such. These establish, manage, supervise and operate MOL Group's Conflict of Interest investigation framework and directly control the investigation of local complex cases and risk assessments. Complex investigations can be started and closed only with the approval of the Group Security Director and tasks regarding the complex cases are delegated by him/her. Local (i.e. country or subsidiary level) Anti-Fraud & Investigation Teams run internal investigations and risk assessments to unfold abuses and offences on local level, and manage the process of complying with information request warrants arriving from law enforcement authorities in criminal proceedings and handles all contact with such authorities.
- **Unbiased and Independent Investigations**: Investigations must be conducted without bias. In cases of potential conflicts of interest, the Group Security Director and Country Security Manager are immediately informed. Investigators are required to maintain neutrality and professionalism throughout the process.
- **Proportionality and Due Diligence**: Investigation procedures are proportionate to the nature and scope of the suspected misconduct. Relevant evidence is collected systematically, ensuring both inculpatory and exculpatory information is documented in compliance with applicable legal and internal requirements.
- **Confidentiality & Data Protection**: All information related to reports and investigations is treated as confidential. The identity of whistleblowers and informants is safeguarded to the extent possible without compromising the integrity of the investigation. Investigation findings are shared only with individuals who have a legitimate need to know, in compliance with data protection laws. Personal data obtained during investigations is handled in compliance with the GDPR and other applicable regulations. Non-relevant information is promptly deleted, and all collected data is erased after the conclusion of the investigation.
- **Protection of Whistleblowers:** Employees who report concerns or refuse to participate in fraudulent or corrupt activities are protected from retaliation. MOL Group supports openness and guarantees that no adverse action, such as dismissal or disciplinary measures, will be taken against employees raising concerns in good faith, even if the concerns are ultimately unfounded.
- **Continuous Monitoring and Improvement:** Anti-Fraud & Investigation Teams regularly monitor, review investigation and anti-fraud procedures, ensuring those align with best practices and legal requirements.
- **Top-Level Commitment**: MOL Group's leadership actively supports the anti-fraud and investigation framework, fostering a culture of zero tolerance for misconduct and promoting ethical business practices. All country managing directors/chairmen – as part of their annual ethics related duties – have to report on the corruption-related risks of the given country they are working in and draw up relevant mitigation plans.

INCIDENTS OF CORRUPTION OR BRIBERY

/G1-4/

ESRS	Disclosure Requirement G1-4
GRI	GRI 3-3

	GRI 2-27 GRI 205-2 GRI 205-3

This section outlines MOL Group's actions to ensure fair business conduct practices, with a focus on anti-corruption and bribery, anti-competitive practices, and related events in 2024:

- 98% of MOL Group employees successfully completed the annual ethics training, which includes dedicated content on anti-corruption.
- MOL Group's Anti-Fraud Team issued quarterly Anti-Fraud newsletters, as a mass awareness tool which were distributed on company internal sites.
- No reported incidents of bribery, corruption, gifts, or hospitality were submitted through MOL Group's whistleblower reporting system, including INA Group.
- No employees were dismissed or disciplined for corruption-related offenses.
- No business partner contracts were terminated or not renewed due to corruption violations.
- No convictions were recorded for violations of anti-corruption or anti-bribery laws. In Germany, the Federal Antimonopoly Office initiated an ad-hoc sectoral assessment in which it requested information from MOL Germany regarding the wholesale petroleum trading market. As of the reporting date, no specific outcome has been reached. In Montenegro, the Agency for the Protection of Competition continued its investigation into an alleged violation of competition law (concerted practice) against INA – Crna Gora d.o.o.. MOL Group has challenged the agency's decision in court.
- No fine have been paid for violation of anti- bribery laws or anti-competitive business practices, nor did MOL Group incur any monetary losses as a result of legal proceedings associated with price fixing and/or price manipulation during 2024.

POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

/G1-5/

ESRS	Disclosure Requirement G1-5
GRI	GRI 2-9-b GRI 415-1

Management oversight on political influence and lobbying activities

The framework for regulatory and public affairs activities is defined in the **Corporate Affairs Area Book**, with the Executive Vice President of Group Strategic Operations and Corporate Development serving as the process owner for implementation.

Standing reports are submitted to the management and supervisory bodies of MOL Group to ensure oversight of political influence and lobbying activities, including two reports per year to the Board of Directors on 'Political and Regulatory Environment Update and Outlook', one report per year to the Sustainable Development Committee of the Board on 'Future Outlook: Key Changes to External Regulatory Framework With Sustainable Development Focus and their Impact on MOL', and biennial reports to the Finance and Risk Management Committee of the Board as part of the Strategic Risk Review on 'Geopolitical And Regulatory Risks'.

Political contribution and lobbying activities

MOL Group aims to foster transparent relationships with governmental and EU officials, as well as external stakeholders, while ensuring compliance with all applicable local legislation and adherence to ethical standards. MOL Group's **Code of Ethics and Business Conduct** explicitly prohibits engagement in political activities or pursuing political agendas. It does not sponsor, donate, or support political programs, parties, or any organizations or events affiliated with them. Employees are free to participate in political activities in a personal capacity, provided these activities are not conducted in MOL Group's name or conflict with the company's interests.

These commitments are incorporated into internal policies as well. MOL Group's **Managing Corporate Giving Activities (Sponsorships, Donations, and Social Investments)** policy prohibits supporting political goals, parties, religious organizations, or any entities that violate human rights, public morals, or represent discriminatory opinions.

In alignment with these principles, MOL Group did not make any direct or in-kind political contributions in 2024.

Recognizing the risks and opportunities associated with regulatory and political changes, MOL Group actively monitors and analyses regulatory initiatives and political developments across its countries of operation. The company engages with EU institutions, national parliaments, governments, and municipalities to support compliance, mitigate risks, and capitalize on opportunities. Key topics MOL Group addressed through advocacy activities in 2024 (based on the EU Transparency Register) include:

- Banking and financial services
- Business and industry
- Climate action
- Competition
- Consumers
- Customs
- Economy, finance, and the euro
- Employment and social affairs
- Energy
- Environment
- International cooperation and development
- Research and innovation
- Single market
- Taxation
- Trade
- Trans-European Networks
- Transport

In terms of the main topics covered by advocacy, MOL Group actively supports EU and national regulations aimed at achieving climate-related targets, reducing CO2 emissions, and promoting renewable energy generation. We recognize the critical role of industrial transformation in meeting the EU's ambitious climate goals and are committed to contributing to this process. In addition, we emphasize the importance of accounting for regional specificities to ensure fair and effective implementation across the Central and Eastern European (CEE) region.

Regarding the EU Fit for 55 package, MOL Group fully supports its overarching climate objectives, including the EU Emissions Trading System, the Carbon Border Adjustment Mechanism, the Renewable Energy Directive, and the Energy Efficiency Directive. We believe achieving these goals requires massive investments in new technologies, supported by smart, technology-inclusive policies that create positive business cases for such investments. Our focus is on ensuring that national implementation of these directives reflects the unique circumstances and capabilities of the CEE region, enabling industry competitiveness while driving sustainability. Specifically, we advocate for the inclusion of all low-carbon technologies, greater flexibility, and a phased approach to compliance. Key areas of our efforts include creating regulatory conditions for hydrogen and biomethane adoption in transport and promoting energy savings through a broad range of technologies.

MOL Group also welcomes regulations that support carbon capture and storage (CCS) and carbon capture and utilisation (CCU), including initiatives under the Net-Zero Industry Act. We view CCS as a critical technology for achieving the EU's 2030 and 2050 emission reduction targets and support its inclusion among net-zero strategic projects. Our advocacy focuses on ensuring robust and nuanced regulations that address the complexities of the entire CCS value chain—from capture to transmission and storage. By promoting positive incentivizing measures, we aim to establish viable, sustainable business cases while considering the regional limitations of landlocked countries and their unique contributions to climate goals.

To optimise its advocacy capabilities, MOL Group actively participates in numerous trade, industry, and professional associations across the European Union. All participation is coordinated by the **Regulatory and Public Affairs department** and adheres to strict ethical standards. In 2024, MOL Group’s total spending on membership fees for EU, international, and national associations amounted to USD 1 691 294, with the following breakdown:

1. **National Associations**: USD 626 669, covering topics such as employer rights, product categories (chemicals, fuels), transport, infrastructure, and energy efficiency.
2. **EU and International Associations**: USD 202 128, covering associations within the oil & gas and petrochemical industries, addressing topics such as decarbonization, low-carbon fuels, and chemical products.
3. **EU Policy Associations**: USD 862 497, covering memberships in organizations such as **FuelsEurope and Concawe**, **CEFIC**, and **IOGP**, addressing issues related to the European Green Deal, sustainable finance, renewable energy, emissions trading, and circular economy. MOL Group actively participates in shaping the agenda of these organisations, and has a high degree of consistency with their positions:
    1. **FuelsEurope**: Supports the European Green Deal, promoting climate neutrality, carbon pricing, and policies that create market demand for low-carbon liquid fuels.
    2. **IOGP**: Advocates for the Paris Agreement and European Green Deal, focusing on methane emissions reduction, platform electrification, renewable energy integration, and policies for carbon capture and storage (CCS) and blue hydrogen.
    3. **CEFIC**: Supports climate neutrality by 2050 and aims to enable a resource-efficient chemical sector. Key initiatives include bio-based and circular solutions, chemical recycling, and climate-neutral product markets.

MOL Group is also registered in the **EU Transparency Register** (REG number: 08569166274-90).

Board members holding position in public administration

In 2024, no new member of the Board of Directors or member of Supervisory Board has been appointed. Currently there is one member in the mentioned boards who is, or has in the last 2 years held position in public administration: Norbert Izer has been serving as a member of the Supervisory Board and the Audit Committee of MOL Group since July 15, 2022. Prior to this appointment, since May 2018, and during 2024, he has been leading the State Secretariat for Taxation within the Ministry of Finance.

Mandatory chamber memberships

In Hungary each economic operator is mandated to register at the chamber of commerce and industry. In line with that, MOL Plc. is registered at the Hungarian Chamber of Commerce and Industry, although as the term suggests, this must not be interpreted as a membership in its original sense.

MOL Plc. is a mandatory member of the Hungarian Chamber of Agriculture, Food Economics and Rural Development. Membership is mandated by the law due to catering services offered at service stations.

SUB-CHAPTER B: SUPPLY CHAIN MANAGEMENT

ESRS	Disclosure Requirement G1-2
GRI	GRI 204-1.1 GRI 3-3 GRI 308-1 GRI 414-1

IMPACTS ON SUPPLIERS

/G1. IRO-1/

Table IM-09: Key regional business partnerships

Severity	Significant, actual impact
Scope	Regional impact (primarily in Central-Eastern Europe)
Likelihood	Actual impact
Description	MOL Group is a major company in the CEE region, therefore a key buyer of products and services of regional companies. This, on one hand, provides secure income for many other companies. On the other hand, many companies (including SMEs) are reliant on the financial performance of MOL Group thus making them potentially exposed.
Actions	MOL Group's mitigation actions to reduce the risk of losing or negatively impacting business partners include conducting regular surveys with B2B customers to strengthen relationships and address any issues that may arise, and ensuring business continuity.
Time horizons	We consider the matter material on all time horizons.
Relevance in the value chain	The impact is relevant in all of MOL Group's value chains.

POLICIES RELATED TO RELATIONSHIPS WITH SUPPLIERS

/G1-2/

MOL Group Procurement is a functional organization that helps MOL Group to achieve its business objectives. It manages a comprehensive supplier base worldwide, including international and local suppliers based on the subject and scope of the procurement procedure. MOL Group contracts with local suppliers whenever it is beneficial, which can be a way of establishing a positive relationship with local communities (IM-09). Local suppliers are promoted since logistics related cost are always taken into consideration during the procurement process. In case of services related to MOL Group locations worldwide, the local presence of international supplies is also considered.

MOL Group Procurement aims to ensure transparency on Group level, treat suppliers equally and fairly, practice integrity and prevent conflicts of interest. Furthermore, the organization ensures that the non-HC purchased products and services are in compliance with relevant policies, laws and regulations and establish sustainable supply chain by integrating sustainability in its procurement processes.

MOL Group has set up the framework of Supplier Lifecycle Management, which consists of four pillars:

i) Supplier Qualification
ii) Supplier Evaluation & Selection
iii) Supplier Performance Evaluation
iv) Supplier Relationship Management

MOL Group has developed further cooperation with suppliers in order to facilitate MOL Group efforts related to sustainable development, including the preparation of a standard criteria system for activities with risk exposure. Sustainability strategies, targets and actions are being incorporated in the category management and supplier relationship management framework as laid out on **MOL Group's Code of Responsible Procurement**.

During 2024, the inbound supply chain CO2 assessment further improved, and supplier engagement program continued with hotspot suppliers. In order to accelerate Sustainable development and decarbonization in the supply chain, Group Procurement organized its Supplier Innovation Day in February 2024. Suppliers had the opportunity to get insight into MOL Group's strategy and challenges. Procurement organization also held its compulsory yearly Sustainability training where procurement professionals have been updated with new legislation and standards and new processes related to Sustainability. Furthermore, Procurement Excellence team organized its first ProcX Day where different sessions and workshops were organized to learn more about current processes and regulations related to sustainability, procurement and skill development.

MOL Group processes are compliant with ISO 50001:2018 requirements (energy management system), these are also applied when dealing with procurement of production materials/assets. Total cost of ownership (TCO, cost during the life-cycle) is part of the evaluation framework, where energy effective solutions are promoted. The origin of the given asset/material is also taken into account during the supplier selection procedure. MOL Group is only concluding contracts with suppliers that have been pre-screened from financial, legal and sustainability, and pre-qualified from HSE aspect. MOL Group is committed to be business partner of suppliers with ethical attitude, thus potential suppliers are also subject of ethical pre-screening (i.e. Illicit employment practices, money laundering activities, terrorist financing, bribery, corruption etc. are reasons for disqualification). Sourcing procedures are managed and controlled via a group-wide used system, which ensures transparency and fair competition of such supplier base. Official communication channels are always set up to enable traceability. Suppliers are also subject to regular post evaluation, and the results serve as a basis to the future cooperation between the parties. MOL Group has built up strong strategic relationships in defined procurement areas ensuring operational stability and long-term cooperation.

Business Partner Code of Ethics is a mandatory element of supplier contracts. Procurement organization also operates a blacklisting process that seeks to prevent MOL Group Companies from doing business with persons, businesses, organizations or entities who abuse the supply chain management system by committing a corrupt, fraudulent, unfair or irregular practice, or default on any contract wilfully or negligently, or the country/region where they operate became sanctioned. The blacklisting is based on the Performance Evaluation, and on continuous monitoring of watchlists, such as Sanctions lists, Political Exposure lists, Police Orders, Negative news. In 2024, Group Procurement updated its supply chain sustainability risk assessment process and identified high risk suppliers based on environmental and social issues. Suppliers' feedback are analysed centrally and corrective actions are defined in order to eliminate or mitigate environmental and social risk. In case of medium or high HSE risk, the supplier is subject to further examination or audit.

METRICS RELATED TO PAYMENT PRACTICES

/G1-6/

There is no unified standard payment target applicable for all MOL Group entities. However, the most commonly used standard payment term is 60 days – therefore we disclose the average time to pay an invoice from reception of invoice compared to this 60 days for all supplier categories. In 2024, 84% of invoices were paid within this timeframe. The average time to pay an invoice from its reception was 40 days. This figure was derived using a representative sampling methodology, covering entities accounting for approximately 70% of total consolidated net revenue. Payments were selected based on invoices where both the document date and payment date fell between January 1, 2024, and December 31, 2024. From this dataset, the days until payment metric was calculated and averaged, yielding the final result.

As of the reporting date, no legal proceedings related to late payments are outstanding. The company ensures that payments are made on or by the due date, aligning with contractual obligations and maintaining predictable cash flow management for suppliers.

SUB-CHAPTER C: DATA PROTECTION & CYBER SECURITY

IMPACTS AND RISKS RELATED TO DATA PROTECTION AND CYBER SECURITY ON SUPPLIERS

/entity-specific/

Cyber Security Risk is one of the 11 strategic risks identified by MOL Group. Annual risk review of the Enterprise Risk Management System (ERM) includes Cyber Security related risk assessment, with the involvement of MOL Group's Cyber Defence Centre.

Albeit not covered in the ESRS topic list during our 2024 Double Materiality Assessment, we have identified 1 impact and 1 risk related to Cyber security and Data Protection, as specified below:

IM-10: Risk of data exposure

Severity	Moderate, potential negative impact
Scope	Global
Likelihood	Low
Description	During its operations, MOL Group collects business and personal information related to employees, business partners, customers and other stakeholders for business purposes. MOL Group has strict procedures on data protection, handling and storing to ensure compliance with personal data regulations (e.g., GDPR) and prevent the abuse in relation to business sensitive information or trade secret regulations. However, the risk of a cyber-attack, IT security breaches, or misconduct by people accessing the data cannot be fully ruled out, which could lead to exposure of personal and or/business information.
Mitigation actions & remendability	Mitigation actions include implementing robust cyber security management practices and providing mandatory training for employees on proper data handling procedures. These actions are designed to protect sensitive information and ensure that staff are well-informed about best practices for data security. The remendability of the impact depends on the scale and nature of potential incidents – if data belongs to natural persons, it is considered an irremediable effect.
Time horizons	We consider potential impact material on all time horizons.
Relevance in the value chain	We consider potential impact material in relation to all of our value chains.

Table RK-11: Risk of information & cyber security incidents

Type	Operational
Likelihood	Low
Magnitude of financial effect	Medium
Description	Global trends are showing steadily growing frequency and intensity of Cyber-attacks / incidents. AI is a new global threat which is widely used by attackers as well as more specified Cyber Crime Groups targeting Industrial Control System's weaknesses, which may have increasing economic impact and relevance on MOL Group.
Related impact & dependencies	Since MOL Group handles the data on suppliers, consumers and other business partners, potential cyber attack against the company might affect those parties as well – see impact on Risk of data exposure (IM-10) for reference.
Mitigation actions	MOL Group has a well-developed cyber security system. To mitigate risks, the company is determined on the continuous improvement of cyber security capabilities, continuous supervision of cyber security risks, education of employees and partners, ensuring the protection of the confidentiality, integrity and availability of data. Cyber security is built into all of MOL Group products and services.
Financial effect & time horizons	Financial effect of the risk (including indirect effects) is difficult to be quantified, but the topic is considered material due to the severity of potential risks regardless of the likelihood, on all time horizons.

POLICIES ON DATA PROTECTION & CYBER SECURITY

/entitiy-specific/

GRI	GRI 418-1

Data Protection

As outlined in the [Code of Ethics and Business Conduct], the protection of personal data is of paramount importance to MOL Group (IM-10). MOL Group is committed to conducting its business in full compliance with applicable data protection laws and regulations, particularly the General Data Protection Regulation (GDPR), while adhering to the highest standards of ethical conduct.

Through robust information technology solutions and regulatory frameworks, MOL Group ensures the confidentiality, integrity, and availability of electronically stored data throughout its lifecycle, encompassing storage, processing, and transfer. This commitment is underpinned by procedures and responsibilities described in the **Processing Personal Data at MOL Group** process description. These procedures are in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR). This regulation lays down the rules on the processing of personal data and the related rights and obligations. All MOL Group-controlled entities operating within the matrix structure are responsible for ensuring compliance with applicable data protection requirements when processing personal data. The key elements of MOL Group's data protection framework include:

- **Information Security Training:** All personnel involved in the management, usage, or operation of MOL Group's IT infrastructure are required to regularly participate in information security awareness training.
- **Access Control:** Access to information infrastructure is granted exclusively to authenticated and authorized users based on the "need-to-know" principle.
- **Data Ownership:** Computer hardware, software, and all information stored on MOL Group's digital systems, including any MOL Group information on external or non-MOL Group systems, are considered company property.
- **Internet Usage Policy:** Limited non-work-related internet use is permitted, provided it does not compromise system or network security, performance, or stability, and does not interfere with professional responsibilities.
- **Data Monitoring:** To ensure security and compliance, MOL Group reserves the right to access and monitor devices and data stored therein, in accordance with privacy and data protection laws, for maintenance or to meet business or legal requirements.
- **Data Breach Management System:** The Archer system serves as MOL Group's platform for managing data breaches. Incidents are reported, investigated, and assessed in collaboration with relevant partner departments.
- **Incident Assessment:** Each data breach incident is evaluated by the Legal, Compliance, and Cybersecurity teams, with final approval provided by the Data Protection Officer.
- **Reporting of Data Breaches:** Suspected data breaches must be reported promptly through the *Data Breach Submission Form* or via email at databreach@mol.hu upon detection.

Cyber Security

MOL Group operates National Critical Infrastructure in Hungary, Slovakia, Croatia, Romania, Austria and Poland, therefore it is subject to regular mandatory external audits under local Cyber Security acts and NIS1 (NIS EU 2016/1148) and NIS2 (NIS2 EU 2022/2555) EU directives. To mitigate the risks associated with cyber crime and misconduct, MOL Group operates a well-established cyber security management framework (RK-11). The highest process-based policy establishing processes, basic rules and requirements related to Cyber Security in MOL Group is the **Cyber Security Area Book**. It includes main tasks and responsibilities of the Chief Information Security Officer and the Cyber Defence Centre. Key elements of the cyber security framework include:

- **Incident Management Policy and Procedure:** A comprehensive incident response process is in place, which includes continuous monitoring of security events, triaging alerts from various sources, and maintaining defined and documented use cases for incident management.
- **Awareness and Preparedness:** Regular exercises are conducted as part of the Cyber Security Awareness Programme and Cyber Security Strategy to address risks related to cyberattacks and improve organizational readiness.
- **Disaster Recovery Policy:** A robust disaster recovery policy and procedure ensure business continuity during disruptive events.
- **Operational Technology and Industrial Control Systems:** Specific initiatives address cyber security risks related to operational technology and industrial control systems.
- **Emergency Programme and Strategy:**
  A dedicated emergency programme and strategy provide preparedness and guidance for handling cyber security incidents.
- **Collaboration with Government Agencies:** Cyber security-related information is shared with relevant government agencies to strengthen collective defense efforts.
- **Threat Monitoring:** Cyber security threats are monitored on an ongoing basis to enable proactive risk identification and mitigation.
- **Internal Assessments and Audits:** Regular internal cyber security assessments, including Procurement Security Assurance and Design Security Assurance, are performed to enhance system resilience and mitigate potential vulnerabilities.

Expectations towards business partners

MOL Group is committed to fostering data protection and cyber security throughout its value chain. Therefore, all contracts with any type of contract contain reference to the **Business Partner Code of Ethics**, expecting alignment with the following principles:

- **Privacy**: Partners shall respect people's privacy and comply with personal data protection laws; only acquire and keep personal information that is necessary and provide adequate information to data owners in compliance with the law. MOL Group business partners shall adopt proper security measures to assure confidentiality, integrity and availability of information.
- **Information security**: Partners are expected to handle information related to other business partners as confidential, in accordance with the applicable confidentiality provisions. Business partners shall adopt proper security measures to assure confidentiality, integrity and availability of information. Business partners shall respect that valuable, confidential ideas, strategies and other types of business information created or developed at MOL Group represent company property, and in certain cases they are under the protection of intellectual property law.

ACTIONS RELATED TO DATA PROTECTION & CYBER SECURITY

/entitiy-specific/

In 2024 there was no major incident in MOL Group, due to continuous hardening activities that are extended into 2025.

In general, a major issue was the prevalence of AI assisted scams and attacks for MOL Group in 2024. It is a region-specific issue, since cyber-crime elements can leverage this new technology for attacking supply chains and the populace of Europe. In case of MOL Group the cyber criminals were using AI assisted phishing campaigns - however after the relevant email protection hardening efforts - these attacks were mitigated and could not reach most users; any other attempts were remediated.

AI as an emerging threat is present in scams - these appeared at the end of 2023 and continued to be an issue during the whole year on the mainstream social media platforms. Cyber criminals used available marketing materials and videos to fabricate a series of scams, which were targeted against the general populace. The scams were targeted using CTI platform and OSINT investigations, which resulted in swift "takedowns" of malicious content.

With the aim of enhancing employee awareness and knowledge about cybersecurity risks and best practices, MOL Group organized the Cyber Security Awareness Days on 19–20 November 2024. The event featured interactive sessions, expert talks, and practical guidance on protecting sensitive information and mitigating cyber threats, reinforcing MOL Group's commitment to maintaining a robust cybersecurity culture.

TARGETS AND METRICS RELATED TO CYBER SECURITY

/entitiy-specific/

MOL Group is committed to ensuring full compliance with all applicable data protection regulations when processing personal or sensitive information. The company's objective is to prevent any instances of data breaches or cybersecurity incidents. While MOL Group actively monitors and manages these risks, specific KPIs and time-bound targets in this area are currently not publicly disclosed.

Data protection

There was a total of 34 substantiated complaints received concerning breaches of customer privacy in 2024. The majority of the incidents were breach of confidentiality with 3 breaches of integrity. None of the incidents were reported to The National Authority for Data Protection and Freedom of Information (NAIH) in 2024.

Cyber Security

In 2024 there were no major incidents in MOL Group, due to continuous hardening activities and awareness campaigns that are extended into 2025.

EXCLUDED DISCLOSURES

Topic	Relevant IDs	Explanation
Animal welfare	G1-1_09	Animal welfare is not considered a material topic
Functions-at-risk of corruption and bribery	G1-1_11 G1-3_07	MOL Group's antifraud and anticorruption practices cover all functions without distinct areas. Therefore, functions-at-risk is not an applicable category.
Connection of investigation committee to administrative, management and supervisory bodies	G1-3_02 G1-3_03	Not specified in policies

Appendix I: Indicators under reasonable assurance

MOL Group has obtained external assurance on its sustainability report under limited assurance, and reasonable assurance on two selected indicators: CO2 emissions under the EU Emissions Trading System (EU ETS) and Total Recordable Injury Rate (TRIR) of MOL Group (excluding FGSZ Zrt., since the Midstream entity is unbundled from other MOL Group operations). In order to ensure continuity and comparability with MOL Group's sustainability reporting practices before the implementation of the requirements of the European Sustainability Reporting Standards (ESRS), the two metrics are also reported separately in this section. The below metrics were prepared in accordance with the revised Global Reporting Initiative (GRI) Standards.

CO2 Emissions under EU ETS

The CO2 emissions regulated under the EU ETS are critical for MOL Group as they directly impact the company's environmental footprint and compliance with climate regulations. Monitoring and managing these emissions help MOL Group contribute to global efforts in mitigating climate change and align with the ESRS E1-5 (paragraph 45 a.) disclosure requirements (equivalent to GRI 305-1), which aim to provide an understanding of the direct impacts of the undertaking on climate change.

	UNIT OF MEASURE	2024	2023	GRI
CO_2 emissions under EU ETS	mn tonnes CO_2-eq	5.66	5.81	305-1

Total Recordable Injury Rate (TRIR)

TRIR is a key indicator of workplace safety and reflects MOL Group's commitment to ensuring a safe working environment for its employees and contractors. This metric is essential for assessing the effectiveness of safety measures and fostering a culture of safety within the organization. The ESRS S1-14 (paragraph 88 c.) disclosure requirements emphasize the importance of reporting work-related accidents to provide transparency on workforce safety.

	UNIT OF MEASURE	2024	2023	GRI
Total Recordable Injury Rate (TRIR)	cases/mn working hr	1.04	1.31	403-9
o/w Own staff	cases/mn working hr	1.64	1.91	403-9
o/w Contractors	cases/mn working hr	0.54	0.81	403-9

The auditor's reasonable assurance opinion can be found at the end of this sustainability statement.

Appendix II: Management system & policies

Sustainability Report Appendix: Management system & policies

MOL Group consists of more than 200 companies, operating in more than 30 countries. To ensure achieving our long-term strategic goals while meeting the needs of stakeholders, our corporate governance is built on common, integrated operation to member companies to be part of MOL Group. Every company belonging to MOL Group Portfolio is assigned to relevant company group from governance point-of-view, based on:

- MOL Group ability to enforce its interests (ownership / management rights),
- MOL Group strategic objectives related to a given company,
- desired level of integration into MOL Group operation,
- activity characteristics, size, complexity and financial status.

Companies within MOL Group's portfolio are categorized in MOL Portfolio Database based on control rights, size, core business, type of operations (matrix, agile, entrepreneurial, non-matrix).

To ensure that all processes are harmonized at the MOL Group level, controls, processes and rules are described in regulations and implemented across the Group. All internal regulations are made available to all employees of MOL Group through the e-REG system.

MOL Group's corporate governance is built on the Main Governance documents:

- **Operational and Organisational Rules** serves as a basis for all other governance and operational rules. It defines the general Corporate Governance framework for the Group.
- **Descriptions of Tasks & Responsibilities** defines the setup of MOL Group organisations and the descriptions of its tasks and responsibilities.
- **Lists of Decision-making Authorities** defines who is responsible for internal decision-making to ensure transparent decision-making processes.
- **Area Books** are tools of Group level business or functional Process Owners to direct and control the operations of their respective areas at a high level. They are structured by business lines (Areas) rather than geographic scope. Area Books are the highest-level process-based regulations, focusing on end-to-end processes describing the operation model of their specific Area to be implemented across all MOL Group companies.
- **Process Descriptions** implement rules across organisational boundaries to ensure efficient processes and legal compliance. They regulate the processes listed in Area Books by defining processes which affect one or more Areas across multiple companies.
- **Methodology Instructions** help standardize operations by issuing a common methodology for performing specific tasks related to one or more Areas across multiple companies.

MOL Group is committed to implementing the best standards of corporate governance structures and practices geared towards shareholders' interests, while also considering the interests of a broader group of stakeholders. This approach is essential for enhancing the value generated for MOL Group's shareholders and people, as stated in the Operational and Organisational Rules. This policy aims to ensure that the interests of key stakeholders are considered when setting any policy integrated into MOL Group's governance system. However, detailed information on the assessment of stakeholders' interests and the considerations applied are not mandatory elements of the policy document and, therefore, cannot be disclosed for each individual policy referenced in the report (in reference to covering MDR-P_05).

Minimum disclosure requirements policies referenced in the Sustainability Report /MDR-P/:

Policy title	Key content /MDR-P_01/	Scope & exclusions /MDR-P_02/	Accountable for implementation /MDR-P_03/	Third-party standards or initiatives /MDR-P_04/	Availability /MDR-P_06/
Circular Economy Services Area Book	Defines the principles and requirements for the CES business segment. Main objectives: coordinate circular economy activities; waste management along the value chain; synergies with core businesses; implementing advanced waste management technologies to achieve strategic corporate targets in line with domestic and EU legislation.	MOL Plc. and controlled operative subsidiaries involved into matrix operation.	Head of Circular Economy Services (Process Owner)	-	Available internally to all employees via e-REG
MOL Group Code of Ethics and Business Conduct	Details MOL Group's commitment to ethical business conduct, including introduces the principles, behaviours and conduct that are necessary to create an ethical culture and operation in compliance with all laws and internal regulations.	All managers and employees of MOL Plc. and all business enterprises controlled directly or indirectly by MOL Plc.	Signed by top management, with main responsibility held by MOL Group Ethics Council	International Bill of Human Rights, European Convention on Human Rights, International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, United Nations Global Compact, Modern Slavery Act 2015, UK Bribery Act 2010, U.S. Foreign Corrupt Practices Act, Partnering Against Corruption Initiative Global Principles for Countering Corruption, Act CLXV	Publicly available on MOL Group's website.

Policy title	Key content /MDR-P_01/	Scope & exclusions /MDR-P_02/	Accountable for implementation /MDR-P_03/	Third-party standards or initiatives /MDR-P_04/	Availability /MDR-P_06/
				of 2013 of Hungary on Complaints and Public Interest Disclosure	
Community Engagement Methodology	Guidance to site-level managers on how to plan and implement successful community engagement activities, the results of which should become integral parts of the general action planning process.	MOL Group - general	Vice President Corporate Communications and Marketing	AA1000SES:2015 Stakeholder Engagement Standard	Publicly available on [MOL Group's website]().
Corporate Affairs Area Book	Defines basic rules and requirements to establish the framework of MOL Group's activities with respect to regulatory and public affairs.	MOL Plc. and controlled operative subsidiaries involved into matrix operation	Group Strategic Operations and Corporate Development	-	Available internally to all employees via e-REG
Cyber Security Area Book	Defines the processes, basic rules and requirements established within MOL Group's Cyber Security.	MOL Group	Head of Information Security	-	Available internally to all employees via e-REG
Diversity & Inclusion Process Description	Ensuring that upholding Diversity & Inclusion standards is a common responsibility throughout MOL Group.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Group HR Vice President	-	Available internally to all employees via e-REG
Downstream Development Area Book	Setting the direction for the Downstream business by developing business strategy and roadmap and description of how this is done through core processes.	MOL Plc. and controlled operative subsidiaries involved into matrix operation	Group Downstream Production and Development Senior Vice President	-	Available internally to all employees via e-REG
Downstream Production Area Book	The aim of this Area Book (hereinafter AB) is to define basic principles and processes about the operation of Downstream Production to show direction to the Production sites, cross functional units, and relevant stakeholders. The main objective of Downstream Production is to create value for our customers via converting raw materials to high quality products on safe, sustainable, reliable and efficient way.	MOL Plc. and controlled operative subsidiaries involved into matrix operation	Group Downstream Development Senior Vice President	-	Available internally to all employees via e-REG
Downstream Tactical Planning and Margin Management	Defining how to set short term targets for MOL Group's Downstream business segment.	MOL Plc. and controlled operative subsidiaries involved into matrix operation	Group Downstream Value chain management senior vice president	-	Available internally to all employees via e-REG
Energy Policy	MOL Plc.'s commitment to continuously improve the efficiency of our energy use, to increases competitiveness and helps to preserve the environment.	MOL Plc.	Signed by: CEO, Deputy CEO, Managing Director	Aligns with ISO 50001 (Energy Management Systems)	Publicly available on MOL Group's website and communicated internally through

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					employee training, operational guidelines, and corporate initiatives.
Group HSE and Social Impact Policy	Declaring MOL Group's public commitment to acting responsibly regarding the health, safety, environmental and social impacts of our daily operations.	General, applicable to MOL Group and its contractors	Signed by Chairman & GCEO. All of our employees and contractors have a responsibility to maintain high HSE standards and management must take a leadership role in this. Accountability for implementing the policy lies primarily with the top management, local CEOs or Managing Directors, supported by the Group HSE Senior Vice President and local HSE Managers.	-	Publicly available on MOL Group website and communicated internally through employee training and operational management. Contractors and suppliers are informed via compliance requirements, ensuring broad awareness and implementation across the value chain.
Group level People Strategy	Sets the key principles related to Human Resource management within MOL Group.	MOL Group	Group HR Vice President	-	Presented to MOL Group top management and Supervisory Board whenever updated (latest update: June 2024)
Health Safety and Environment Area Book	Highest level process-based regulation in the field of HSE management, focusing on end-to-end processes describing the operation model	MOL Plc. and controlled operative subsidiaries involved into matrix operation	HSE Senior Vice President (Process Owner)	-	Available internally to all employees via e-REG.
Health Safety and Environment Management System	The main goal of this regulation is to define the Health, Safety and Environment requirements in MOL Group in order to support the execution of the business strategic objectives.	MOL Plc. and controlled operative	HSE Senior Vice President (Process Owner), and local	ISO 14001 for environmental management, OHSAS	Available internally to all employees via e-REG. Updates to

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		subsidiaries involved into matrix operation	CEOs and local SD&HSE Managers.	18001 for occupational health and safety, AQUEDUCT Water Risk Atlas for the identification of water-risk areas, Management and Remediation of Sites in the Petroleum Industry (IPIECA), and Commission Decision 2000/532/EC regarding waste-handling.	KPIs and HSE indicators are communicated to relevant HSE contacts, ensuring stakeholders stay informed about performance metrics and continuous improvement initiatives.
HSE & Social Impact Policy	Lists MOL Group's commitments towards acting responsibly on the health, safety, environmental (HSE) and social impact of our activities as part of day-to-day business.	All employees and contractors have a responsibility to maintain high HSE standards and management must take a leadership role in this. We also aim to promote this policy in non-operated joint ventures.	Signed by top management.	-	Publicly available on MOL Group's website.
Human Resources Area Book	Defines and describes main HR processes, main rules and requirements and sets objective strategic goals, to ensure top quality HR services to the customers (employees and managers) across the MOL Group, compliant with local legal and market requirements.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation.	HR Vice President	-	Available internally to all employees via e-REG
Integrated Management System of MOHU	States MOHU Plc.'s commitment to enhance waste management in Hungary, promoting a circular economy and sustainability, shifting	MOHU Plc.	CEO of MOHU Zrt.	ISO 9001 - Quality Management Systems; ISO 14001 -	Publicly available on MOHU's website (in Hungarian)

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	societal views on waste, reducing pollution, and supporting carbon neutrality.			Environmental Management Systems; ISCC document on handling used cooking oil	
Manage Community Engagement and Grievances	Provides the principles and practices of community engagement and the process of identifying and involving stakeholders and the high-level process for handling incoming grievances from the public, communities and local authorities in order to achieve a Group-level integrated approach to community engagement and grievance management.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Vice President Corporate Communications and Marketing	ISO 9001:2015, ISO 14001:2015, AA1000 Stakeholder Engagement Standard 2015, IPIECA: Community grievance mechanisms in the oil and gas industry	Available internally to all employees via e-REG
Managing Corporate Giving Activities Process Description	Defines Group level principles and processes related to sponsorship, donation and social investment activities in order to provide a comprehensive framework for the management of successful, efficient and transparent corporate giving activities within the company, highly supporting the achievement of MOL Group strategic objectives.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Vice President Corporate Communications and Marketing	-	Available internally to all employees via e-REG
Mobility Area Book	Defines basic principles and requirements about the operation of Group Mobility for the related business units, subsidiaries and internal stakeholders. The main objective of the Group Mobility organization is to achieve its strategic target: to position MOL Group as an integrated, complex mobility service provider targeting customers both owning and not owning vehicles.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Head of Group Mobility	-	Available internally to all employees via e-REG
MOL Group Operational and Organisational Rules	Defines general Operational & Organisational Rules to attain MOL Group strategic objectives and increase shareholder value.	MOL Plc. and those companies wherein on supreme body MOL Plc., directly or indirectly, bears more than 50 % of votes or where MOL Plc, directly or indirectly, exercises majority ownership or otherwise	Group Strategic Operations and Corporate Development Executive Vice President	-	Available internally to all employees via e-REG

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		controlling rights based on a contract concluded with the other owner(s).			
Optimisation, Sales and New Businesses Area Book	Defines basic principles and requirements about the operation of Optimization, Sales, and New Businesses E2E Process that aims to connect Customers with Downstream capabilities to satisfy customer needs.	MOL Plc. and controlled operative subsidiaries involved into matrix operation	Group Downstream Executive Vice President	-	Available internally to all employees via e-REG
Process Safety Management Process Description	Defines the process safety management requirements in MOL Group in order to support the execution on of the business strategic objectives.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Group HSE Vice President	-	Available internally to all employees via e-REG
Processing Personal Data at MOL Group process description	Ensures that the procedures of MOL Group companies are complying with the applicable laws regarding the protection of the personal data of the data subjects	MOL Plc. and controlled, operative subsidiaries involved into matrix operation.	Head of Group Legal & Compliance	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016; Directive 95/46/EC (General Data Protection Regulation, GDPR)	Available internally to all employees via e-REG
Renewables & Energy Efficiency Management Area Book	Defining basic rules and requirements to establish MOL Group's Renewables & Energy Efficiency Management Framework.	MOL Plc. and controlled European operative subsidiaries involved into matrix operation.	Head of Group Renewables	Energy Management System (ISO 50001)	Available internally to all employees via e-REG
Retail Area Book	Defines basic principles and requirements about the operation Group Retail in order to show direction to the business units and internal stakeholders. The main objective of the Group Retail organization is to maximize company value through understanding customer needs, increasing margin revenues, ensuring optimal store format portfolio and size and standardized high-quality delivery of customer experience	MOL Plc. and controlled, operative subsidiaries involved into matrix operation	Group Retail Senior Vice President	-	Available internally to all employees via e-REG
Security Area Book	Defines fundamental rules and basic requirements to establish, operate and continuously develop Security services at MOL Group. It contains a comprehensive set of principles for security governance,	MOL Plc. and controlled, operative	Group Security Director	SOLAC: Safety of Life At Sea Convention; ISPC: International	Available internally to all employees via e-REG

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	security operations, technical security services, crisis & continuity management, travel security and anti-fraud & investigation related activities.	subsidiaries involved into matrix operation		Ship and Port facility Security	
Shape Tomorrow Strategy	Shape Tomorrow is MOL Group long-term integrated business and sustainability strategy.	MOL Group – in general	MOL Group's management as a whole	-	Publicly available on MOL Group's website.
Talent Management Process Description	Ensures harmonised and unified integrated Talent Management process across MOL Group, have unified Talent Management language, reach clarity over Talent roles, responsibilities and KPIs.	MOL Plc. and controlled, operative subsidiaries involved into matrix operation.	Group HR Vice President	-	Available internally to all employees via e-REG

ASSURANCE STATEMENT

The MOL Group sustainability report complies with the requirements of the European Sustainability Reporting Standards (ESRS) as adopted under the Corporate Sustainability Reporting Directive (CSRD).

MOL Group's sustainability auditor has provided:

- Limited assurance statement which covers the content of the sustainability statement,
- Reasonable assurance statement which covers two key indicators: CO_2 under ETS and TRIR for own workforce.

The assurance statements regarding the sustainability disclosures are provided as separate documents on MOL Group's website.