

# **MOL GROUP INTEGRATED ANNUAL REPORT**

**2025**

## TABLE OF CONTENTS

INTRODUCTION.....	3
LETTER FROM THE CHAIRMAN-CEO AND GROUP-CEO .....	4
MANAGEMENT DISCUSSION AND ANALYSIS, BUSINESS REPORT AND SUSTAINABILITY STATEMENT .....	5
MANAGEMENT DISCUSSION AND ANALYSIS AND BUSINESS REPORT .....	6
CORPORATE GOVERNANCE .....	36
SUSTAINABILITY STATEMENT .....	49
CONSOLIDATED FINANCIAL STATEMENTS .....	195

# INTRODUCTION

## 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 18th 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 2025.

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 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 on MOL Group's [website](#).

The content of this integrated annual report is also available online at [www.molgroup.info](http://www.molgroup.info).

## LETTER FROM THE CHAIRMAN-CEO AND GROUP-CEO

2025 was a rather eventful year for MOL Group—at times even more eventful than we would have wished. The increasingly stringent regulatory environment affecting regional supply security, the continued disruptions to our crude oil supply, and the unfortunate fire incident at our Százhalombatta refinery in October were all developments we would have preferred to avoid. Yet they became defining moments that tested our resilience, our professionalism, and our culture.

There is an old adage: prepare for the worst but hope for the best. At MOL, we do not rely on hope. We rather work to achieve the best. And 2025 proved once again that our people, our capabilities, and our determination are what truly safeguard the company's future.

When new regulations emerge, we do not wait passively for their impact to unfold. We actively seek dialogue with decision-makers to ensure that the realities of regional supply security are understood. When the United States imposed sanctions on certain Russian companies, we immediately engaged through the appropriate channels to highlight the potential consequences for Central and Eastern Europe. Thanks to these efforts, an exemption was granted—an outcome that protected the region's energy stability and demonstrated the value of constructive engagement.

When the fire struck the Százhalombatta refinery—the largest such incident in MOL's history—our firefighters and technical teams responded with extraordinary professionalism. Their swift and disciplined actions contained the fire, limited the damage, and ensured that no one was injured. Their performance was a powerful reminder of the expertise and dedication that underpin our operations every day.

In our Exploration & Production segment, 2025 brought achievements in Hungary that few would have predicted in a region with one of the world's most extracted oil and gas fields. Our teams succeeded in reversing long-term production decline trends in the Pannonian Basin, delivering an average 4% increase in oil and gas production compared to 2024. This was not the result of luck, but of deep geological knowledge, disciplined execution, and relentless commitment across exploration, development, and production.

Our Consumer services business has completed a transformation journey to become one of the highest-quality fuel retail network in the region, while continuing to diversify beyond fuel. More than one-third of our margin now comes reliably from non-fuel products and services—a testament to the strength of our brand, the quality of our offering, and the success of our long-term strategy. This shift has been financially rewarding, and it positions us well as we explore the next strategic steps for further expansion.

Despite the challenges of the year, MOL Group ends 2025 with a solid operational, cultural, and financial foundation. This strength allows us not only to withstand a volatile environment but to pursue growth with confidence. Again, we are not merely hoping for opportunities—we are working to create them.

One such opportunity is the potential acquisition of the Serbian Oil&Gas company NIS, which would significantly expand our regional presence. Much of the groundwork for this transaction was laid in 2025, and its impact could shape MOL Group's trajectory for many years to come. While the process is ongoing, the progress achieved so far reflects our ambition and our readiness to take bold steps when the strategic rationale is clear.

As we look ahead, we do so with the conviction that MOL Group is stronger today than it was a year ago. We have demonstrated once again that our success is built not on circumstances, but on my colleagues —whose expertise, resilience, and commitment continue to drive this company forward.

# MANAGEMENT DISCUSSION AND ANALYSIS, BUSINESS REPORT AND SUSTAINABILITY STATEMENT

# MANAGEMENT DISCUSSION AND ANALYSIS AND BUSINESS REPORT

## TABLE OF CONTENTS

1. OVERVIEW OF THE MACROECONOMIC AND INDUSTRY ENVIRONMENT .....	7
2. INTEGRATED CORPORATE RISK MANAGEMENT.....	10
3. FINANCIAL AND OPERATIONAL OVERVIEW OF 2025.....	13
3.1 Key achievements and summary of 2025 results .....	15
3.2 Corporate Strategy.....	17
3.2.3 Scenario Analysis.....	17
3.3 Upstream.....	19
3.4 Downstream.....	22
3.5 Innovative Businesses and Services.....	27
3.6 Midstream.....	31
4. APPENDICES.....	33
5. DISCLOSURE OF OTHER INFORMATION REQUIRED BY ACT C. OF 2000. ON ACCOUNTING .....	35

## 1. OVERVIEW OF THE MACROECONOMIC AND INDUSTRY ENVIRONMENT

### MACROECONOMIC ENVIRONMENT

Global output growth was surprisingly steady in 2025 despite U.S.-led trade disruptions and increasing geopolitical tensions. However, the 3.3% growth rate remained well below the historical average of 3.8%<sup>1</sup> and was reliant on a narrow range of drivers, notably strong demand for AI-related investment in some countries, particularly the U.S. Without a broad-based recovery in the manufacturing sector the frontloading of exports ahead of the introduction of new tariff rates provided only a temporary boost to GDP growth. After growth of 2.8% in 2024, the U.S. economy expanded by 2.1% in 2025, gaining the most from the AI-led investment ramp-up as consumption softened and interest rates remained elevated during the year. The economic damage caused by tariff rates and frequent policy changes has been smaller than expected at the beginning of the year, yet longer-term household inflation expectations remain above the central bank target. While 2025 has seen a general weakening in the U.S. dollar, it remained relatively stable in relation to the Chinese yuan. While Chinese GDP met the government target of 5%, retail sales and investment continued to worsen with economic growth becoming increasingly reliant on exports over domestic demand. In nominal terms, unadjusted for price changes, the growth rate has been significantly lower, given persistent deflation.

In 2025, real GDP growth in the euro area reached 1.5%, up from 0.9% in 2024, while the EU as a whole expanded by 1.6%, compared to 1.0% the previous year. The euro area has been benefitting from easing inflation, declining interest rates and targeted fiscal measures. Germany remained “the sick man of Europe”, just avoiding recession (0.2% growth), France’s debt problem escalated, while Spain and the Central and Eastern European (CEE) region outperformed the rest of the bloc. Strategic focus in Europe shifted from climate goals to security and competitiveness and resulted in delaying and softening some green regulations. Trade and security relations between the U.S. and EU cooled over the year, with an increasing gap between attitudes toward NATO, and the war in Ukraine.

The CEE region recorded moderate expansion in 2025, with average real GDP growth of around 2.5 %, surpassing euro-area dynamics. Momentum was underpinned by resilient domestic demand, bolstered by ongoing near-shoring and continued wage convergence, though growth was constrained by subdued external markets and cautious business sentiment. Poland and Croatia continued to outperform others, while the German economy’s weakness weighed on the performance of Hungary and Slovakia. Inflation remained close to but above central bank targets, with persistent services inflation.

The Hungarian economy disappointed once again in 2025. Real GDP growth expectations continuously declined during the year, ending at 0.3%. Output was weighed down by weak investment and sluggish external demand, though private consumption provided a stabilizing base as wage growth and targeted fiscal measures supported household spending. Inflation eased significantly, averaging 4.4% for the year, mainly because of the consistently restrictive monetary policy.<sup>2</sup> The interest rate premium was a major reason behind the 7% appreciation of the forint relative to the euro.

### OIL AND NATURAL GAS MARKET DEVELOPMENTS

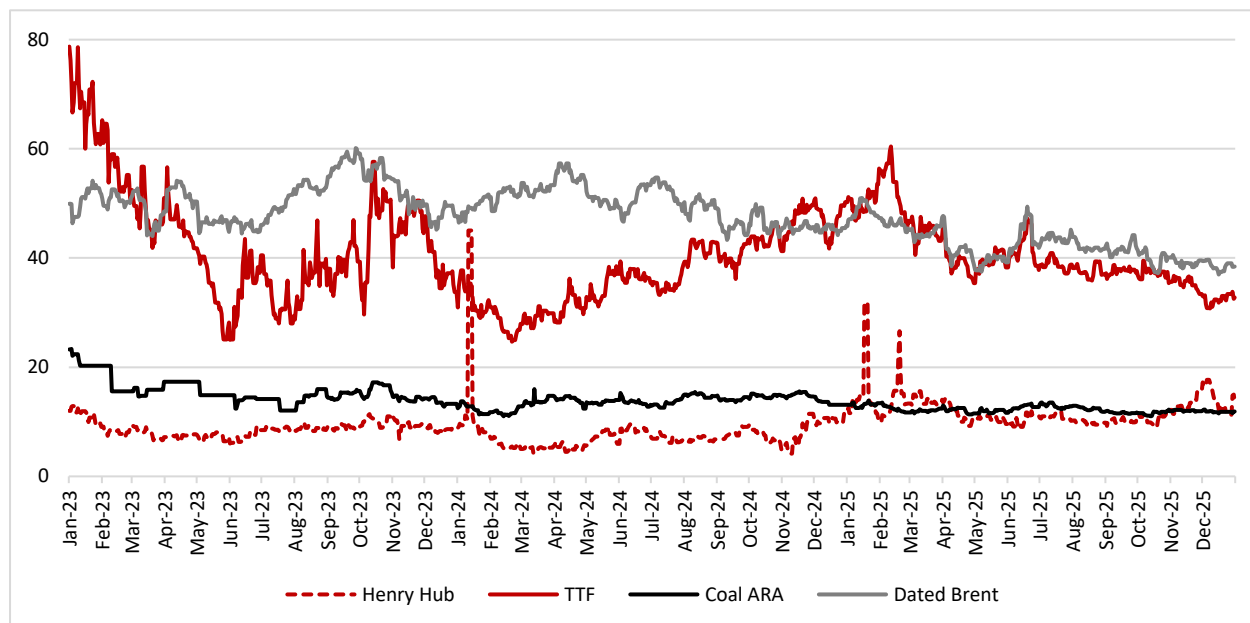
Crude oil market dynamics in 2025 were shaped by persistent oversupply, subdued demand and episodic geopolitical shocks. Benchmark Brent traded at the lowest annual level since COVID, averaging 69.1 USD/bbl (down from 80.8 USD/bbl in 2024), and oscillating between 83.1 USD/bbl in January and 60.2 USD/bbl in December.<sup>3</sup> Global crude oil inventories reached 3.2 billion bbl by the end of the year, 14% above pre-pandemic levels. Non-OPEC+ producers led supply growth, particularly the United States, Guyana, Canada and Brazil, while U.S. crude output alone reached a record 13.9 Mmbpd in October. OPEC+ responded with modest production increases to gain back market share, gradually unwinding voluntary cuts mid-year<sup>4</sup>. On the demand front, China surprised with record annual crude imports of 11.6 Mmbpd, bolstered by strategic and commercial stockpiling, which provided some price support. Nevertheless, global oil demand remained restrained amid slower economic growth and trade tensions. Geopolitical flare-ups – including the Israel-Iran conflict and sporadic Houthi attacks disrupting Red Sea shipping – and escalating sanctions against Russia injected volatility. As a consequence of sanctions, the discount on Urals versus Brent widened significantly in the last two months of the year. Overall, abundant non-OPEC+ supply, cautious OPEC+ easing and uncertain demand kept prices in a downward trajectory, defining a challenging crude environment for 2025.

<sup>1</sup> [IMF World Economic Outlook](#) (January 2026).

<sup>2</sup> [Hungarian Central Statistical Office](#) (first estimate).

<sup>3</sup> [EIA](#).

<sup>4</sup> [Reuters](#).

**Figure 1: Selected crude, natural gas and coal prices dtd (USD/MWh, 2023-2025, Bloomberg data)**

European natural gas prices were on a downward trajectory throughout the year, with the Dutch TTF (Title Transfer Facility) falling from 58.4 EUR/MWh in February to 26.6 EUR/MWh by the end of the year. Still, on average TTF prices were 35.4 EUR/MWh last year, slightly above the 34.6 EUR/MWh average of 2024. 2025 witnessed major transformations in the European natural gas market as transit of Russian gas through Ukraine ended from 1 January leading to a further ~40% year-on-year drop in Russian pipeline flows and leaving TurkStream the only remaining route to import Russian gas via pipeline. Diversification of supply resulted in a shift towards more LNG imports: Europe became the biggest LNG importer of the world, with U.S. shipments almost doubling and supplying around 25% of total European imports by the end of the year.<sup>5</sup> Facing depleted storage levels at the end of the 2024/2025 heating season led to the relaxation of EU filling targets. While the 90% storage filling obligation has been extended by two years, until the end of 2027, member states are now allowed to meet the target between October 1st and December 1st, the need to maintain that level until December was also removed, and deviations were permitted during difficult market conditions. Despite reduced speculative buying, structurally lower demand and the LNG surge, the European gas market balance remained fragile, leaving the EU increasingly vulnerable to global supply and weather shocks.

## DOWNSTREAM

European refineries continue to struggle due to the combination of continued diversification away from Russian import, falling domestic fuel demand, high operating costs, strict EU climate regulations, import competition from newer mega refineries and logistical issues like low river levels affecting inland supply chains. Five refineries have closed in the past two years. In 2025, crude processing ended in Grangemouth (UK), Wesseling (Germany) and Livorno (Italy). A number of refineries, among them Gelsenkirchen (Germany) have seen significant reductions in capacity. In contrast, outside Europe the world has added more than 2.5 Mmbpd crude distillation capacity since 2024, mainly in China, India, the Middle East, Mexico and for the first time in decades, in Africa too, squeezing European gasoline export markets significantly. Still, structurally lower European crude runs, extended sanctions and heightened concerns over tightening regional product supply kept European refining margins unexpectedly firm in 2025. European gasoil crack spreads were particularly strong again, boosted by repeated Ukrainian drone attacks on Russian oil refineries and export facilities as well as a number of unplanned refinery outages and a heavy year-end maintenance season.

The European chemicals industry has faced the third year of economic recession after energy prices became structurally higher and global petrochemical capacity additions in China, India, and Middle East led to a chemical market overcapacity amid weakening demand. Moreover, most chemicals exported from the European Union into the U.S., the sector's biggest export market, will be subject to a 15% tariff, rising from 1% on average before the deal. Domestic demand recovery also continues to be sluggish, the automotive market is particularly struggling. Also, the post-Covid shift in household spending from (durable) products towards services continues to drag down petrochemical consumption. European commodity and base chemicals, in the beginning of the petrochemical value chain are hit most by the increased production costs, low domestic demand, squeezed export market shares and increased import pressure. As no marked shift was seen in EU level industrial policy or economic fundamentals, numerous chemical companies have started to shift production from commodity to specialty chemicals and/or away from Europe.

<sup>5</sup> [Bruegel](#).



<b>Macro figures (average)</b>	<b>FY 2025</b>	<b>FY 2024</b>	<b>Ch %</b>
Brent dated (USD/bbl)	69.1	80.8	(14)
Urals-Brent spread (USD/bbl, DAP India Urals quotation) <sup>(11)</sup>	(3.0)	(3.6)	(17)
TTF gas price (EUR/MWh)	35.4	34.6	2
Premium unleaded gasoline 10 ppm (USD/t) <sup>(12)</sup>	703.7	789.0	(11)
Gas oil – ULSD 10 ppm (USD/t) <sup>(12)</sup>	683.9	748.4	(9)
Naphtha (USD/t) <sup>(13)</sup>	535.9	622.3	(14)
Fuel oil 3.5 (USD/t) <sup>(13)</sup>	398.0	444.1	(10)
Crack spread – premium unleaded (USD/t) <sup>(12)</sup>	180.9	178.1	2
Crack spread – gas oil (USD/t) <sup>(12)</sup>	161.1	137.5	17
Crack spread – naphtha (USD/t) <sup>(12)</sup>	13.1	11.3	16
Crack spread – fuel oil 3.5 (USD/t) <sup>(12)</sup>	(124.7)	(166.8)	(25)
Crack spread – premium unleaded (USD/bbl) <sup>(12)</sup>	15.4	14.0	10
Crack spread – gas oil (USD/bbl) <sup>(12)</sup>	22.7	19.7	15
Crack spread – naphtha (USD/bbl) <sup>(13)</sup>	(8.9)	(10.8)	(18)
Crack spread – fuel oil 3.5 (USD/bbl) <sup>(13)</sup>	(6.2)	(10.6)	(42)
Brent-based MOL Group refinery margin (USD/bbl) <sup>(14)</sup>	7.6	6.1	25
Brent-based Complex refinery margin (MOL + Slovnaft) (USD/bbl) <sup>(14)</sup>	8.0	6.4	25
Ethylene (EUR/t)	1,161	1,217	(5)
Butadiene-naphtha spread (EUR/t)	425	384	11
MOL Group Variable petrochemicals margin (EUR/t) <sup>(15)</sup>	173	200	(14)
HUF/USD average	353.2	365.2	(3)
HUF/EUR average	397.9	395.2	1
O/N USD SOFR (%)	4.2	5.1	(18)
3m EURIBOR (%)	2.2	3.6	(39)
3m BUBOR (%)	6.5	7.3	(11)
<b>Macro figures (closing)</b>	<b>FY 2025</b>	<b>FY 2024</b>	<b>Ch %</b>
Brent dated closing (USD/bbl)	62.6	74.6	(16)
HUF/USD closing	328.4	393.6	(17)
HUF/EUR closing	385.4	410.1	(6)
MOL share price closing (HUF)	2,940	2,730	7

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
<b>Market and financial risks</b>		
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.	<ul style="list-style-type: none"> <li>• Integrated business model</li> <li>• Continuous monitoring</li> <li>• When necessary, commodity hedging instruments to mitigate other than 'business as usual' risks or general market price volatility</li> </ul>
Foreign exchange (FX) risk	The Group has FX exposure due to mismatch of currency composition of cash inflows and outflows, investments, debts.	<ul style="list-style-type: none"> <li>• Monitoring FX risk and balancing the FX exposures of the operating &amp; investment cash flow with the financing cash flow exposures when necessary and optimal</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Continuous monitoring</li> <li>• Adequate mix of funding portfolio</li> <li>• When necessary, interest rate swap hedging instruments to mitigate risks</li> </ul>
Credit risk	MOL Group provides products and services with deferred payment terms to eligible customers which exposes it to credit risk.	<ul style="list-style-type: none"> <li>• Diversified customer portfolio</li> <li>• Customer evaluation model, continuous monitoring</li> <li>• Group-wide credit insurance program</li> </ul>
Financing/Refinancing risk	MOL Group has significant debt outstanding. Inability to refinance those or inability to draw down funds could cause liquidity problems.	<ul style="list-style-type: none"> <li>• Diversified funding sources/instruments</li> <li>• Diversified, balanced, and decently long maturity profile</li> <li>• Investment grade rating (BBB-) supports smooth capital markets access</li> </ul>
<b>Operational Risks</b>		
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.	<ul style="list-style-type: none"> <li>• Comprehensive HSE activities, a group-wide Process Safety Management system including asset related operational risk management process</li> <li>• Lifetime Extension program continued in petchem and rolled out to refineries</li> <li>• Preventive &amp; Predictive maintenance (Uptime program) with thorough equipment criticality assessment behind</li> <li>• Group-wide insurance management program</li> </ul>
Crude oil and gas supply risk	Crude supply disruption (insufficient quantity or quality) can disrupt refineries and petchem sites continuous operation.	<ul style="list-style-type: none"> <li>• Crude oil-supply diversification strategy implemented;</li> <li>• Emergency reserves available</li> </ul>

Risks/processes	Risk description	Risk mitigation methods
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	<ul style="list-style-type: none"> <li>• Stock management</li> <li>• Supplier management</li> <li>• Sourcing and supply chain diversification</li> </ul>
Exploration & Production reserve replacement	Higher than expected decline and failure to replace reserves.	<ul style="list-style-type: none"> <li>• Production optimization programs and organic reserve replacement activities are both focus areas of Exploration &amp; Production operations</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Continuous improvement of cyber security capabilities</li> <li>• Continuous supervision of cyber security risks (Group and OpCo level) ensuring the protection of the confidentiality, integrity and availability of data</li> <li>• Cyber security is built into all the MOL Group products and services</li> <li>• Continuous education of employees and partners.</li> </ul>
Fraud Risk	Fraudulent activities (external & internal fraud) may cause significant financial and reputational losses	<ul style="list-style-type: none"> <li>• Control functions on local and group level</li> <li>• Anti-Fraud Awareness (Newsletter, Mandatory trainings)</li> <li>• Anti-Fraud &amp; Investigation procedures, dedicated Team</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Crisis Management plans in place</li> <li>• 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 previous 3-4 years, ensuring a life-proof and working framework to manage any possible further endemic/ pandemic situations.</li> <li>• Continued and sustainable practices defined, adjusted to country local measures and company internal circumstances</li> </ul>
<b>Strategic risks</b>		
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.	<ul style="list-style-type: none"> <li>• Continuous monitoring of new regulations and sanctions</li> <li>• Strengthened compliance process</li> <li>• Participation in legislative processes, consultations, proactive advocacy along MOL interests</li> <li>• Adapting MOL strategy in response to changes</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Continuous monitoring of the (geo)political risk, compliance with local regulations and international sanctions</li> <li>• Investment opportunities are evaluated with quantifying of country risk in discount rate</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Stakeholder governance processes introduced to monitor and adjust to any reputational risks</li> </ul>
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.	<ul style="list-style-type: none"> <li>• MOL Group's strategy is underpinned by the energy transition</li> <li>• Several operational steps taken to mitigate physical risks emanating from climate change (Sustainability Report)</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Disciplined stage gate process across Capex project pipeline</li> <li>• 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</li> </ul>

Risks/processes	Risk description	Risk mitigation methods
		<ul style="list-style-type: none"> <li>• Supplier selection criteria, audits</li> </ul>
Human Capital Risk	<p>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.</p> <p>Unavailability of skilled workforce may lead to disruptions in the operation.</p>	<ul style="list-style-type: none"> <li>• HR framework to attract, develop and engage employees</li> <li>• Capability development for all employee levels to ensure future-proof skillset</li> <li>• Intergenerational collaboration to enhance internal knowledge transfer</li> <li>• Focus on digital transformation, and employee experience</li> <li>• Developing diverse &amp; collaborative culture</li> <li>• Working environment and conditions framework in order to attract and retain diverse talents</li> </ul>

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.

### 3. FINANCIAL AND OPERATIONAL OVERVIEW OF 2025

Summary of results	HUF billion			USD million <sup>(3)</sup>		
	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Net sales revenues <sup>(6)</sup>	8,696.3	9,178.7	(5)	24,700	25,127	(2)
EBITDA	1,077.8	1,091.3	(1)	3,048	2,992	2
<b>EBITDA excl. special items <sup>(1)</sup></b>	<b>1,077.8</b>	<b>1,091.3</b>	<b>(1)</b>	<b>3,048</b>	<b>2,992</b>	<b>2</b>
<b>Clean CCS-based EBITDA <sup>(1) (2)</sup></b>	<b>1,185.8</b>	<b>1,121.7</b>	<b>6</b>	<b>3,369</b>	<b>3,073</b>	<b>10</b>
Profit from operation	436.5	584.9	(25)	1,204	1,615	(25)
<b>Profit from operation excl. special items <sup>(1)</sup></b>	<b>517.3</b>	<b>603.8</b>	<b>(14)</b>	<b>1,450</b>	<b>1,663</b>	<b>(13)</b>
<b>Clean CCS-based operating profit <sup>(1) (2)</sup></b>	<b>625.3</b>	<b>634.2</b>	<b>(1)</b>	<b>1,771</b>	<b>1,744</b>	<b>2</b>
Net financial gain / (expenses)	22.4	(66.9)	n.a.	63	(181)	n.a.
<b>Net profit attributable to equity holders of the parent</b>	<b>298.1</b>	<b>368.2</b>	<b>(19)</b>	<b>810</b>	<b>1,023</b>	<b>(21)</b>
Operating cash flow before ch. in working capital	922.7	914.6	1	2,623	2,488	5
Operating cash flow	976.8	820.5	19	2,798	2,218	26
<b>EARNINGS PER SHARE</b>						
Basic EPS, HUF	398.1	496.2	(20)	1.08	1.38	(22)
<b>INDEBTEDNESS</b>						
Simplified Net debt/EBITDA	0.47	0.74	n.a.			
Net gearing <sup>(4)</sup>	10.0%	14.9%	n.a.			

#### KEY FINANCIAL DATA BY BUSINESS SEGMENTS

Net Sales Revenues <sup>(6)</sup>	HUF billion			USD million <sup>(3)</sup>		
	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	658.5	685.4	(4)	1,865	1,871	0
Downstream	6,984.5	7,155.1	(2)	19,820	19,578	1
Gas Midstream	115.8	127.3	(9)	327	348	(6)
Consumer Services <sup>(9)</sup>	3,445.7	3,741.2	(8)	9,812	10,240	(4)
Circular Economy Services	448.5	428.6	5	1,277	1,182	8
Corporate and other	440.0	436.4	1	1,267	1,187	7
<b>Total Net Sales Revenues</b>	<b>12,093.0</b>	<b>12,573.9</b>	<b>(4)</b>	<b>34,368</b>	<b>34,406</b>	<b>0</b>
Intersegment transfers <sup>(7)</sup>	(3,396.7)	(3,395.2)	0	(9,668)	(9,279)	4
Total external net sales revenues from cont.op.	8,696.3	9,178.7	(5)	24,700	25,127	(2)
Total external net sales revenues from discont.op.	0.0	0.0	n.a.	0	0	n.a.
<b>Total External Net Sales Revenues <sup>(6)</sup></b>	<b>8,696.3</b>	<b>9,178.7</b>	<b>(5)</b>	<b>24,700</b>	<b>25,127</b>	<b>(2)</b>
<b>EBITDA</b>	<b>FY 2025</b>	<b>FY 2024</b>	<b>Ch %</b>	<b>FY 2025</b>	<b>FY 2024</b>	<b>Ch %</b>
Upstream	398.7	402.1	(1)	1,125	1,099	2
Downstream	394.6	427.4	(8)	1,116	1,171	(5)
Gas Midstream	73.8	89.0	(17)	208	244	(15)
Consumer Services <sup>(9)</sup>	324.2	271.0	20	927	743	25
Circular Economy Services	(11.3)	(20.3)	(44)	(34)	(52)	(34)
Corporate and other	(119.0)	(68.0)	75	(339)	(185)	83
Intersegment transfers <sup>(7)</sup>	16.8	(9.9)	n.a.	45	(29)	n.a.
<b>Total EBITDA from cont.op.</b>	<b>1,077.8</b>	<b>1,091.3</b>	<b>(1)</b>	<b>3,048</b>	<b>2,992</b>	<b>2</b>
Total EBITDA from discont.op.	0.0	(40.7)	(100)	0	(111)	(100)
<b>Total EBITDA</b>	<b>1,077.8</b>	<b>1,050.6</b>	<b>3</b>	<b>3,048</b>	<b>2,881</b>	<b>6</b>

	HUF billion			USD million <sup>(3)</sup>		
Depreciation	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	215.7	170.3	27	625	462	35
Downstream	217.0	180.3	20	619	491	26
Gas Midstream	17.0	16.6	3	49	46	7
Consumer Services <sup>(9)</sup>	123.1	77.3	59	357	210	69
Circular Economy Services	17.6	13.1	34	50.4	35.9	40
Corporate and other	51.9	50.2	3	148	137	8
Intersegment transfers <sup>(7)</sup>	(1.2)	(1.4)	(14)	(3)	(5)	(40)
<b>Total Depreciation from cont.op.</b>	<b>641.3</b>	<b>506.4</b>	<b>27</b>	<b>1,844</b>	<b>1,377</b>	<b>34</b>
Total Depreciation from discont.op.	0.0	0.0	n.a.	0	0	n.a.
<b>Total Depreciation</b>	<b>641.3</b>	<b>506.4</b>	<b>27</b>	<b>1,844</b>	<b>1,377</b>	<b>34</b>

Operating Profit	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	183.0	231.8	(21)	500	638	(22)
Downstream	177.6	247.0	(28)	497	681	(27)
Gas Midstream	56.8	72.4	(22)	159	199	(20)
Consumer Services <sup>(9)</sup>	201.0	193.8	4	571	532	7
Circular Economy Services	(29.0)	(33.4)	(13)	(85)	(88)	(3)
Corporate and other	(170.9)	(118.3)	45	(487)	(323)	51
Intersegment transfers <sup>(7)</sup>	17.9	(8.5)	n.a.	49	(24)	n.a.
<b>Total operating profit cont.op.</b>	<b>436.5</b>	<b>584.9</b>	<b>(25)</b>	<b>1,204</b>	<b>1,615</b>	<b>(25)</b>
Total operating profit discont.op.	0.0	(40.7)	(100)	0	(111)	(100)
<b>Total Operating Profit</b>	<b>436.5</b>	<b>544.2</b>	<b>(20)</b>	<b>1,204</b>	<b>1,504</b>	<b>(20)</b>

EBITDA Excluding Special Items <sup>(1)</sup>	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	398.7	402.1	(1)	1,125	1,099	2
Downstream	394.6	427.4	(8)	1,116	1,171	(5)
Downstream - clean CCS-based <sup>(2)</sup>	508.4	463.4	10	1,453	1,267	15
Gas Midstream	73.8	89.0	(17)	208	244	(15)
Consumer Services <sup>(9)</sup>	324.2	271.0	20	927	743	25
Circular Economy Services	(11.3)	(20.3)	(44)	(34)	(52)	(34)
Corporate and other	(119.0)	(68.0)	75	(339)	(185)	83
Intersegment transfers <sup>(7)</sup>	16.8	(9.9)	n.a.	45	(29)	n.a.
<b>Total Clean CCS-based EBITDA <sup>(2)</sup></b>	<b>1,185.8</b>	<b>1,121.7</b>	<b>6</b>	<b>3,369</b>	<b>3,073</b>	<b>10</b>
<b>Total EBITDA excluding special items cont.op.</b>	<b>1,077.8</b>	<b>1,091.3</b>	<b>(1)</b>	<b>3,048</b>	<b>2,992</b>	<b>2</b>
TOTAL EBITDA excluding special items discont.op.	0.0	(40.7)	(100)	0	(111)	(100)
<b>Total EBITDA excluding Special Items</b>	<b>1,077.8</b>	<b>1,050.6</b>	<b>3</b>	<b>3,048</b>	<b>2,881</b>	<b>6</b>

	HUF billion			USD million <sup>(3)</sup>		
Operating Profit Excluding Special Items <sup>(1)</sup>	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	229.6	250.8	(8)	642	686	(6)
Downstream	177.6	247.0	(28)	497	681	(27)
Gas Midstream	56.8	72.4	(22)	159	199	(20)
Consumer Services <sup>(9)</sup>	235.2	193.8	21	675	532	27
Circular Economy Services	(29.0)	(33.4)	(13)	(85)	(88)	(3)
Corporate and other	(170.9)	(118.3)	45	(487)	(323)	51
Intersegment transfers <sup>(7)</sup>	17.9	(8.5)	n.a.	49	(24)	n.a.
<b>Total operating profit excluding special items cont.op.</b>	<b>517.3</b>	<b>603.8</b>	<b>(14)</b>	<b>1,450</b>	<b>1,663</b>	<b>(13)</b>
Total operating profit excluding special items discount.op.	0.0	(40.7)	(100)	0	(111)	(100)
<b>Total Operating Profit Excluding Special Items</b>	<b>517.3</b>	<b>563.1</b>	<b>(8)</b>	<b>1,450</b>	<b>1,552</b>	<b>(7)</b>

Capital Expenditures	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Upstream	144.9	115.8	25	416	316	32
Downstream	244.0	316.0	(23)	715	860	(17)
Gas Midstream	17.8	17.8	0	52	47	11
Consumer Services <sup>(9)</sup>	41.7	62.8	(34)	122	169	(28)
Circular Economy Services	37.3	34.1	9	109	93	17
Corporate and other	93.8	85.9	9	278	227	22
Intersegment transfers <sup>(7)</sup>	(2.1)	(2.4)	(13)	(6)	(7)	(14)
<b>Total Capital Expenditures</b>	<b>577.3</b>	<b>630.0</b>	<b>(8)</b>	<b>1,686</b>	<b>1,705</b>	<b>(1)</b>

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

### 3.1 KEY ACHIEVEMENTS AND SUMMARY OF 2025 RESULTS

In 2025 MOL reached Clean CCS EBITDA of HUF 1,185.8 bn (USD 3,369 mn), marking an increase of 6% in HUF terms year-on-year and also above the guidance of around USD 3 bn reflecting management expectations. Results were supported by refining margins rising by 1.6 USD/bbl on average, an increase in upstream production and a continued organic rise in the profitability of the Consumer Services business segment, while the oil price environment and deterioration in the petrochemicals environment weighed on results, as well as the drop in crude processing capacity utilization in the final months of the year as a result of a fire in the Danube refinery.

#### Key Financial Highlights

- ▶ In the Upstream segment, EBITDA reached HUF 398.7 bn (USD 1,125 mn) in 2025, marking a 1% decrease compared to 2024 in HUF terms as production volumes increased by 1% while the price of Brent fell by 14% and TTF natural gas quotations were 2% higher on average in EUR terms.
- ▶ In 2025, Downstream Clean CCS EBITDA of HUF 508.4 bn (USD 1,453 mn) translated to a 10% year-on-year growth in HUF terms, supported by higher refining margins in a volatile environment. The petrochemicals business continued to contribute negatively to results, and so did the fire at one of the distillation units that led to up to 50% of the crude distillation capacity of the Danube refinery was unutilized in the last two months of the year.
- ▶ EBITDA of Consumer Services increased by 20% in HUF terms in 2025, reaching HUF 324.2 bn (USD 927 mn) as a result of organic growth driven by non-fuel sales and one-off effects.
- ▶ Gas Midstream achieved HUF 73.8 bn (USD 208 mn) EBITDA in 2025, representing a decrease of 15% in HUF terms compared to 2024, as a result of a combination of robust demand for transmission activities, changes in regulated tariffs and macroeconomic drivers.
- ▶ Circular Economy Services reported EBITDA of HUF -11.3 bn (USD -34 mn) as the Deposit Refund Scheme was ramped up during the year that led to extra operational expenses; still, the negative EBITDA result was 44% lower in HUF terms than in 2024 thanks to efforts to enhance operational efficiency showing first results.
- ▶ Operating cash flow grew by 19% in HUF terms and amounted to HUF 976.8bn (USD 2,798 mn), supported by a release of working capital amounting to HUF 54.1 bn (USD 175 mn).

- ▶ Capital expenditures reached HUF 577.3 bn (USD 1,687 mn) in 2025, 1% lower than in 2024 as a result of less turnarounds in Downstream, partly compensated for lower spending on acquisitions and higher spending on key ongoing projects like the Rijeka refinery upgrade.
- ▶ Reflecting the high cash flow generation for the Group, net Debt/EBITDA, the Group's key metrics for indebtedness, decreased to 0.49x by end-2025, well below the management guidance threshold of 1.0x.

#### Key Operational Highlights

- ▶ Oil and gas production increased to 94.7 mboepd in 2025, above the annual guidance of 92-94 mboepd thanks to continued excellence in the operation of Hungarian assets and a ramp-up in Kazakhstan and KRI-based production. Partnerships were struck with the oil&gas incumbents in Kazakhstan, Azerbaijan, and Turkey.
- ▶ The Consumer Services network closed the year with 2,311 stations, down from 2,330 stations from 2024. The rollout of the non-fuel brand "Fresh Corner" as a standalone retail concept started during the year.
- ▶ In Downstream, the Rijeka refinery upgrade progressed to near completion by the end of the year and crude diversification projects also progressed according to plan. An efficiency-enhancing project Tomorrow Downstream was launched with the goal to reach USD 1.4 bn mid-cycle EBITDA beyond 2027.
- ▶ In line with MOL's strategic ambitions to expand in the renewables space, a share-purchase agreement was signed to acquire a 304 MWp photovoltaic portfolio in Hungary, which quadruples MOL's current solar capacity.
- ▶ On an extraordinary general meeting on 27 November 2025, shareholders approved that the Group's legal structure is to change to a holding structure.



## 3.2 CORPORATE STRATEGY

In alignment with the Paris climate objectives and the strategic direction set by the European Union, MOL Group outlined its transformation pathway to 2030 in the 2024 update of its *Shape Tomorrow* strategy. The strategy reflects the expectations of key stakeholders while acknowledging the specific realities of the oil and gas sector and the Central and Eastern European region. MOL describes its approach as a “smart transition,” emphasizing the need to identify the most effective avenues for advancing the energy transition while maintaining a strong focus on economic value creation.

### Shape Tomorrow strategy

MOL Group’s updated *Shape Tomorrow* strategy sets out a transition pathway through 2030 and committing to a long-term ambition of achieving net climate neutrality by 2050. This trajectory is supported by the relatively robust economic outlook of Central and Eastern Europe (CEE) and MOL’s intention to preserve or strengthen its position in its markets—factors that together provide the financial and space needed to execute its transition program.

The strategy introduced more ambitious climate targets: MOL aims to reduce its Scope 1 and 2 emissions by 25% by 2030 compared with 2019 levels. While acknowledging that Scope 3 emissions are largely driven by regional fossil-fuel demand and therefore less directly controllable, the company has nonetheless committed to a 5% absolute reduction in Scope 3 emissions by 2030.

Delivering this decarbonization goal will require significant capital investment and a shift beyond its traditional oil and gas competencies. Between 2025 and 2030, approximately 30-40% of MOL’s CAPEX budget will be directed toward low-carbon initiatives. In line with the smart transition approach, MOL remains conservative in its financial planning: it expects average annual organic investments of around USD 1.9 billion in real terms over 2025-2030 – just slightly above the USD 1.8 billion average recorded between 2018 and 2023. This approach enables the company to maintain a strong balance sheet while preserving flexibility for potential inorganic growth opportunities and competitive shareholder returns.

### Segments contribution to the strategy

With the bulk of the Group’s emissions generated by the **Downstream** segment, the highest climate impact can be achieved by the decarbonization of this segment. In line with the strategic directions, MOL has taken the important steps to expand in biofuels, green hydrogen, biogas, and waste utilization to advance its transition agenda. The inauguration of the a green hydrogen plant in Hungary in 2024, the largest in the CEE region, was a clear step in this direction as well as the continued expansion in the photovoltaic portfolio operated by the Group. However, the Downstream strategy also emphasizes the need to safeguard the region’s supply security, and both the ongoing crude-diversification efforts and the Rijeka refinery upgrade are expected to strengthen resilience on that front.

Circular Economy Services is the newest business segment of the Group, started in 2023 and driven by with the start of the waste management concession in Hungary. A key milestone was the rollout of the Deposit Refund System, which scaled up throughout 2024 and reached over 88% return rate over 2025, over several benchmarks in EU countries with a more established refund scheme. Circular Economy Services is expected to become a key enabler of synergies with Downstream operations by supplying the volume and quality of feedstocks required for MOL’s circularity ambitions to materialize.

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.

The Upstream segment continues to serve as a vital cash engine for MOL Group, with simplified free cash flow expected to average around 20 dollars per barrel of oil equivalent throughout the strategic horizon. In the CEE region, MOL will concentrate on optimizing production, upgrading infrastructure, and improving hydrocarbon recovery to sustain output and bolster regional energy security. At the same time, the company is advancing a portfolio of low-carbon technologies, including lithium extraction, methane-emission reduction, and carbon capture, utilization and storage (CCUS). Further to that, geothermal energy is a direction that already started to be executed with exploratory drilling started in Lescan, Croatia in 2025.

## 3.2.3 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 were 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.

During 2025, the changes in the geopolitical realities prompted an update to the scenarios set of the *Shape Tomorrow strategy*. The update includes scenarios that differ not only in the speed of transition, but also on the degree of geopolitical tensions and thus distinguishes between 1-block, 2-block, and multi-block worlds. In a 1-block world scenario, governments to re-commit to global cooperation in tackling

emissions and other environmental threats resulting in a relatively swift green energy transition. The 2-block world scenario assumes that a bipolar global order emerges, with the U.S. and China competing across infrastructural, digital, production, and finance networks. A multi-block world foresees that national individualism, sovereignty, and protectionism dominate politics and economic policy. The green energy transition is the slowest in this latter scenario mostly due to more scattered global economy not only slowing down overall economic growth but also hindering the trade of sustainable technologies and the critical raw materials necessary for their manufacturing.

In 2025 in its annual exercise of assessing the progress on MOL's strategy, the Board of Directors discussed if the Shape Tomorrow strategy needs a review in light of the changed scenarios. While the change in the scenarios was supported by the Board, it noted that the implications with regards to the strategy is similar and thus decided to maintain the Shape Tomorrow strategy.

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 2025	FY 2024	Ch %
EBITDA	398.7	402.2	(1)
<b>EBITDA excl. spec. Items <sup>(1)</sup></b>	<b>398.7</b>	<b>402.2</b>	<b>(1)</b>
Operating profit/(loss)	183.0	231.9	(21)
<b>Operating profit/(loss) excl. spec. Items <sup>(1)</sup></b>	<b>229.6</b>	<b>250.9</b>	<b>(8)</b>
<b>CAPEX and investments</b>	<b>144.9</b>	<b>113.2</b>	<b>28</b>
o/w exploration CAPEX	15.9	17.0	(6)

Hydrocarbon Production (mboepd)	FY 2025	FY 2024	Ch %
<b>Crude oil production <sup>(8)</sup></b>	<b>41.0</b>	<b>39.8</b>	<b>3</b>
Hungary	12.5	11.5	9
Croatia	8.8	9.3	(5)
Kurdistan Region of Iraq	4.1	4.0	2
Pakistan	0.6	0.5	20
Azerbaijan	13.4	12.7	6
Other International	1.5	1.7	(12)
<b>Natural gas production</b>	<b>35.4</b>	<b>37.0</b>	<b>(4)</b>
Hungary	21.8	21.6	1
Croatia	10.3	11.3	(9)
o/w. Croatia offshore	2.3	2.8	(18)
Pakistan	3.1	3.9	(21)
Other International	0.2	0.2	0
<b>Condensate <sup>(5)</sup></b>	<b>3.8</b>	<b>4.2</b>	<b>(10)</b>
Hungary	2.7	2.7	0
Croatia	0.6	0.7	(14)
Pakistan	0.6	0.8	(25)
<b>Average hydrocarbon production of fully consolidated companies</b>	<b>80.3</b>	<b>81.0</b>	<b>(1)</b>
Russia (Baitex)	3.3	3.5	(6)
Kazakhstan	4.2	2.7	56
Hungary	0.4	0.4	0
Kurdistan Region of Iraq (Pearl Petroleum)	6.6	6.3	5
<b>Average hydrocarbon production of joint ventures and associated companies</b>	<b>14.5</b>	<b>12.9</b>	<b>12</b>
<b>Group level average hydrocarbon production</b>	<b>94.7</b>	<b>93.8</b>	<b>1</b>

Main external macro factors	FY 2025	FY 2024	Ch %
Brent dated (USD/bbl)	69.1	80.8	(14)
TTF gas price (USD/boe)	69.2	63.7	9

Average realized hydrocarbon price	FY 2025	FY 2024	Ch %
Average realized crude oil and condensate price (USD/bbl)	61.0	71.6	(15)
Average realised gas price (USD/boe)	65.5	51.4	27
<b>Total hydrocarbon price (USD/boe)</b>	<b>62.8</b>	<b>63.2</b>	<b>(1)</b>

Production cost (USD/boe)	FY 2025	FY 2024	Ch %
<b>Average unit OPEX of fully consolidated companies</b>	<b>7.5</b>	<b>6.7</b>	<b>12</b>
Average unit OPEX of joint ventures and associated companies	3.9	3.5	11
Group level average unit OPEX	6.9	6.2	11
<b>Capital Expenditures</b>			

FY 2025	Hungary	Croatia	Kurdistan Region of Iraq	Pakistan	Azerbaijan	Other	Total - FY 2025	Total - FY 2024
HUF bn								
Exploration	10.3	1.4	0.0	0.6	3.1	0.4	15.9	17.0
Development	17.4	23.5	0.1	1.6	38.2	4.1	84.8	75.6
Other	8.2	13.7	3.0	0.3	1.8	5.8	32.8	20.6
Acquisitions	11.5	0.0	0.0	0.0	0.0	0.0	11.5	2.5
<b>Total - FY 2025</b>	<b>47.3</b>	<b>38.6</b>	<b>3.2</b>	<b>2.4</b>	<b>43.1</b>	<b>10.3</b>	<b>144.9</b>	
<b>Total - FY 2024</b>	<b>29.6</b>	<b>33.0</b>	<b>1.5</b>	<b>2.3</b>	<b>45.3</b>	<b>4.0</b>		<b>115.7</b>

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 2025

Upstream EBITDA, excluding special items, decreased by 1% year-on-year in 2025 and amounted to HUF 398.7 bn, driven by lower hydrocarbon prices and higher operating cost.

Total group production (including JVs and associates) increased by 1% compared to the previous year, resulting in an average 94.7 mboepd for the year. Higher production volume was mainly driven by Kazakhstan's new wells (put into production in 2024), Hungary's newly drilled exploration and development wells that were put into the production in 2025 and Azerbaijan's production increase that is mostly driven by higher entitlement share due to PSA mechanism. All of 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 11% and reached 6.9 USD/boe in 2025, mainly due to higher FX effect (stronger HUF and EUR compared to last year).

Upstream organic CAPEX reached HUF 133.4 bn (including HUF 5.8 bn for Oil field services companies) in 2025, increasing by 18% year-on-year. The higher amount is mainly driven by the start of Croatia's offshore drilling campaign, higher spending in Hungary's development projects, and the inclusion of OFS in 2025 reporting, which was mainly spent for asset replacement and maintenance. More than 90% of organic CAPEX was spent in the CEE region and Azerbaijan, mostly for development projects.

In 2025, Upstream continued to be a key cash flow contributor of the MOL Group, with HUF 265.3 bn simplified free cash flow (defined as the difference between segment EBITDA and CAPEX) generated.

#### Changes in the Upstream regulatory environment

CEE: In 2025, the EU Net Zero Industry Act and regulation 2024/1787 EU on reduction of methane emissions remain in force.

In Hungary, a new royalty regime was introduced effective from January 2025. Production commitments were eliminated, including authority contracts. The new regime also introduced new royalty categories and progressive royalty rates, but equally enables the state to predictably realize higher royalty in case of higher prices. Also, regulated gas price scheme is abolished.

### 3.3.2 OPERATIONAL OVERVIEW OF 2025

#### Exploration

Total of 5 exploration and appraisal wells were drilled in 2 countries. Besides drilling, seismic acquisition campaigns and interpretation works progressed in Croatia, Hungary, Pakistan, Kurdistan Region of Iraq and Azerbaijan.

In Hungary, the Shallow Gas exploration program continued with the drilling of two wells, of which one well was successful and put in production in October. Görgeteg-Babócsa-33 shallow gas well (drilled in 2024) was put into production in March. Som-8 well (drilled in 2024) was completed and started production in February. Appraisal well Som-7 was found dry and plugged and abandoned. Galga-4, successful oil discovery in partnership with O&GD, started production in August. In exploration bid round, MOL has been awarded 4 blocks (Hatvan and Kiskőrös will be explored by MOL only, while Tamási and Buzsák will be explored jointly by MOL and TPAO, all operated by MOL). Geothermal licensing progressed with new Szeged approval and completed seismic work, methane compliance advanced with reporting, LDAR and flare reduction planning, and lithium projects moved forward.

In Croatia, in Drava-03 block, a Veliki Rastovac 2 Du was found uncommercial, and plugged and abandoned in January. INA entered the second exploration phase in June 2025, extending the licence for 2 years and committing to 3 additional wells. During 2025, interpretation of the 200 km<sup>2</sup> Virovitica 3D seismic survey near the Veliki Rastovac-1 discovery identified multiple shallow gas prospects and follow-up opportunities. Following a successful first-phase campaign that resulted in 4 hydrocarbon wells drilled in Sava-07 block, partnering with Vermilion, entered the second exploration phase in September, committing to drilling 4 wells over the next 2 years. On geothermal exploration block Lešćan, GT-1 well was drilled to target depth after 3D seismic processing. The well showed lower pressure but acceptable temperature and permeability, and modelling and test preparations are ongoing.

In Romania, EX-1/5 exploration licences expired in April 2025.

In the Middle East, Asia and Africa region, exploration activities continued in Pakistan and Egypt. In Pakistan, in operated TAL block, Razgir-1 exploration well, drilled in 2024, was put into production in October. 3D Seismic Data Reprocessing was completed on Kot South and Sarozai prospects on reprocessed data. The TAL license was extended for two years with drilling and seismic commitments, while the Margala Block extension was requested based on G&G evaluation. In Egypt, the exploration concession is in its first phase, expiring in August 2026. Seismic data acquired in 2024 were processed and interpreted in 2025, generating a prospect portfolio. Drilling of the highest-ranked prospect is planned for Q2 2026. In Azerbaijan, MOL Group and SOCAR signed major onshore exploration and production sharing agreement for the Shamakhi-Gobustan region in Azerbaijan, with MOL as operator (65%) and SOCAR (35%).

### Field Development and Production

In 2025, production optimization programs continued in Hungary, Croatia and Russia, which resulted in an annualized production uplift of 2.6 mboepd with a total of 125 well workovers performed.

In Hungary, Biharkeresztes - Körösújfalú EGR project started-up in Q1 and Körös-8 well was successfully drilled and put in production in December. Construction of Vecsés gathering station is ongoing. The production optimization program continued, resulting in a total of 49 well interventions completed, consequently adding to production approximately 2.1 mboepd increment on an annualized basis. Hungarian Energy Ministry approved the exclusion of Algyő Gas Plant from ETS February, driven by the optimization and electrification of the plant. OGD's Endrőd Asset's acquisition in Eastern Hungary, transaction completed on March 31<sup>st</sup>.

In Croatia, implementation of the Production Optimization project continued, and within its scope, a total of 43 well workovers were completed in 2025, contributing 0.4 mboepd additional production on an annualized basis. Jam-183 well was put into production ahead of schedule. Gola-4 re-entry project was started but discontinued due to the inability to finish P&A on the existing well Gola-4. The Enhanced Oil Recovery (EOR) program continued with carbon dioxide injection on Ivanić and Žutica fields. Turnaround on Ivana K compressor platform was successfully finished with minimized production impact while improving reliability and safety. The offshore drilling campaign started on the Ika A platform and includes two re-entry wells; one well was drilled and put into production in December, while drilling of the second well is still ongoing. In the Izabela area, Energean and INA advanced the Irena gas field development toward planned 2027 start-up. New steam turbine installed on Molve plant to decrease purchase of electrical energy and reduction of CO<sub>2</sub> emissions started with operation in January.

In the CIS region, In Russia, 2025 drilling program delivered one horizontal well, which was completed and brought on stream in July. Well workover program continued, with 33 well interventions completed with achieved approximately 0.1 mboepd increment on an annualized basis. A one-week production shutdown occurred in August due to restrictions on oil deliveries to Transneft following the shutdown of the Druzhba pipeline. In Kazakhstan, production from five wells in the Rozhkovskoye field (U-10, U-12, U-23, U-26, U-21) was disrupted throughout the year due to planned and unplanned shutdowns. Transfer Station construction was completed in November. In Azerbaijan, a total of 18 wells were delivered within the 2025 drilling program, of which 10 are producers, 5 water injectors, 1 gas injector, 1 cuttings re-injection well and 1 Non-Associated Gas producer. For NAG project, completion of the West Chirag J34 producer well has been postponed, shifting expected first gas to Q2 2026.

In Pakistan, Development and production licence awarding of Razgir and Tolanj, and application for Mamikhel and Maramzai extensions are submitted to regulator. Drilling activities continued in TAL block, where Makori Deep-3 was successfully drilled and completed with SMART completion, tied-in and producing since August. Makori East Secondary Compression project completed and in operation since June. By completing 3 production optimization jobs, achieving an initial incremental production of 0.1 mboepd.

In the Kurdistan Region of Iraq, on Shaikan field, export sales resumed following the restart of the Iraq–Turkey Pipeline in September after 2.5 years of shutdown. In July, Shaikan production was suspended for two weeks as a safety precaution after drone attacks on KRI oil fields. In Pearl, the KM250 development was completed in October, adding an increase of ~50% in total installed capacity. In November, a drone strike on the KM250 condensate storage tank caused a 2.5-day shutdown of the plant.

In Egypt, field development activities continued. In North Bahariya concession, 13 wells were drilled in 2025, of which 11 were completed and brought into production. In Ras Qattara concession, 1 development well was drilled and put onstream, and drilling of a second well started in December. In West Abu Gharadig concession, 1 development well was drilled and placed in production. Additionally, 7 well workovers were carried out in Ras Qattara and 3 in West Abu Gharadig to maintain basic production.

### 3.4 DOWNSTREAM

Segment IFRS results (HUF bn)	FY 2025	FY 2024	Ch %
EBITDA	394.6	427.4	(8)
<b>EBITDA excl. spec. items <sup>(1)</sup></b>	<b>394.6</b>	<b>427.4</b>	<b>(8)</b>
<b>Clean CCS-based EBITDA <sup>(1) (2)</sup></b>	<b>508.4</b>	<b>463.4</b>	<b>10</b>
o/w Petrochemicals <sup>(1) (2)</sup>	(78.3)	(32.9)	138
Operating profit/(loss) reported	177.1	247.0	(28)
<b>Operating profit/(loss) excl. spec. items <sup>(1)</sup></b>	<b>177.1</b>	<b>247.0</b>	<b>(28)</b>
<b>Clean CCS-based operating profit/(loss) <sup>(1) (2)</sup></b>	<b>290.9</b>	<b>283.1</b>	<b>3</b>
<b>CAPEX (organic)</b>	<b>243.4</b>	<b>316.0</b>	<b>(23)</b>

MOL Group without INA	FY 2025	FY 2024	Ch %
EBITDA excl. spec. items <sup>(1)</sup>	390.9	440.6	(11)
<b>Clean CCS-based EBITDA <sup>(1) (2)</sup></b>	<b>473.2</b>	<b>451.5</b>	<b>5</b>
o/w Petrochemicals clean CCS-based EBITDA <sup>(1) (2)</sup>	(78.3)	(32.9)	138
Operating profit/(loss) excl. spec. items <sup>(1)</sup>	206.8	287.8	(28)
<b>Clean CCS-based operating profit/(loss) <sup>(1) (2)</sup></b>	<b>289.1</b>	<b>298.7</b>	<b>(3)</b>

INA Group	FY 2025	FY 2024	Ch %
EBITDA excl. spec. items <sup>(1)</sup>	3.7	(13.3)	n.a.
<b>Clean CCS-based EBITDA <sup>(1) (2)</sup></b>	<b>35.2</b>	<b>11.9</b>	<b>196</b>
Operating profit/(loss) excl. spec. items <sup>(1)</sup>	(29.7)	(40.7)	(27)
<b>Clean CCS-based operating profit/(loss) <sup>(1) (2)</sup></b>	<b>1.8</b>	<b>(15.6)</b>	<b>n.a.</b>

Refinery and petrochemicals margin	FY 2025	FY 2024	Ch %
Brent-based MOL Group refinery margin (USD/bbl) <sup>(14)</sup>	7.6	6.1	25
Brent-based Complex refinery margin (MOL+Slovnaft) (USD/bbl) <sup>(14)</sup>	8.0	6.4	25
MOL Group Variable petrochemicals margin (EUR/t) <sup>(15)</sup>	173	200	(14)

External refined product and petrochemical sales by country (kt)	FY 2025	FY 2024	Ch %
Hungary	4,745	4,811	(1)
Slovakia	1,953	1,939	1
Croatia	2,568	2,558	0
Italy	1,574	1,510	4
Other markets	9,946	8,888	12
<b>Total</b>	<b>20,785</b>	<b>19,705</b>	<b>5</b>

External refined and petrochemical product sales by product (kt)	FY 2025	FY 2024	Ch %
<b>Total refined products</b>	<b>19,604</b>	<b>18,602</b>	<b>5</b>
o/w Motor gasoline	4,154	3,802	9
o/w Diesel	11,617	11,181	4
o/w Fuel oil	451	237	90
o/w Bitumen	488	569	(14)
<b>Total petrochemicals products</b>	<b>1,181</b>	<b>1,102</b>	<b>7</b>
o/w Olefin products	163	178	(8)
o/w Polymer products	958	848	13
o/w Butadiene products	60	76	(21)
<b>Total refined and petrochemicals products</b>	<b>20,785</b>	<b>19,705</b>	<b>5</b>

Organic CAPEX (in HUF bn)	FY 2025	FY 2024	YoY Ch %	Main projects FY 2025
R&M CAPEX and investments	178.0	196.5	(9)	INA: Rijeka Refinery Upgrade Project MOL: Periodical maintenance, MOL-NEW MALEIC ANHYDRIDE UNIT IN Danube Refinery, Diesel and Naphtha Int. pipe, MOL Pump station Reconstruction in Danube Refinery
Petrochemicals CAPEX	65.4	119.6	(45)	MPC Olefin Conversion Unit, SN Steam Cracker Lifetime extension, MPC Periodical maintenance, MPC Steam Cracker Renewal of large machines, SN Steam Cracker Off Gas Processing
Power and other	0.0	0.0	n.a.	
<b>Total</b>	<b>243.4</b>	<b>316.0</b>	<b>(23)</b>	

Change in regional motor fuel demand	Market			MOL Group sales		
FY 2025 vs. FY 2024 in %	Gasoline	Diesel	Motor fuels	Gasoline	Diesel	Motor fuels
Hungary	1	2	1	(2)	(2)	(2)
Slovakia	3	(1)	(0)	4	(5)	(3)
Croatia	3	2	3	(0)	1	1
Other	4	(1)	0	12	8	9
<b>CEE 10 countries</b>	<b>4</b>	<b>(1)</b>	<b>0</b>	<b>5</b>	<b>3</b>	<b>3</b>

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

Figures are also available in the annual [Data Library](#) on the company's website.

### 3.4.1 FINANCIAL OVERVIEW OF 2025

In 2025, Downstream achieved a Clean CCS EBITDA of HUF 508.4 bn, which is 10% higher than the previous year's performance (USD 1.453 bn, 15% higher year-on-year). The good financial performance was attributed to favourable macro environment and higher refinery margins compared to 2024. Due to the continuing downward trend in the industry, the petrochemical segment made a negative contribution to the Clean CCS EBITDA with its low petrochemical margin despite the slight increase in sales volumes.

Extra taxes in Hungary also made an impact on the results of Downstream. The revenue-based special tax previously introduced in 2023 was phased out as of January 1st, 2025. The CO2 tax levied on MOL and MPC remained at the rate of 36 EUR/tCO2 and hindered results for the third consecutive year amounting to USD 96 mn. The extension of the Ural-Brent spread tax through 2025 coincided with the widening trend in the spread in the second half of the year resulting in USD 84 mn tax payment.

The Brent-based MOL Group refinery margin averaged around 7.6 USD/bbl in 2025, representing a 1.5 USD/bbl (25% year-on-year) increase compared to the base period, influenced by stronger middle distillate crack spreads. While the widening Urals-Brent spread and a decrease in extra taxes had a favourable effect too on MOL Group's financial performance. Considering motor fuels, demand increased, while sales decreased over 2025 in Hungary. In Slovakia, demand and sales both decreased, while Croatia experienced an increase in both demand and sales in 2025. Despite the flat demand in other CEE countries, there was a significant increase in sales in 2025. In spite of the volatile external environment and unplanned internal events such as the fire incident in the Danube Refinery in October, MOL Group ensured stable and sufficient market supply in domestic markets throughout the year.

MOL Group's petrochemicals margin averaged at 173 EUR/t, which is 27 EUR/t lower year-on-year (-14%), driven by unfavourable macro environment and higher operating costs. Although mitigated by a slight increase in sales, the Petrochemicals segment had a negative impact on the overall performance of Downstream.

Total investments in the Downstream business unit reached HUF 243 bn, representing a 23% decrease compared to 2024. About 73% of this amount was spent on Refining and Marketing projects. Strong efforts were made to comply with EU sanctions and regulations, with the crude diversification program in focus.

In terms of ongoing transformational projects, after the hot-commissioning phase in 2024, on-spec production of the first grades was successfully carried out in 2025 at the Polyol Complex. The Rijeka Refinery upgrade project (RRUP) reached 99% completion by the end of 2025, despite unfavourable external factors, such as labour shortages and increased construction materials prices.

In order to increase resilience and competitiveness, Downstream has launched the Tomorrow Downstream program (TODO). The three-year initiative aims to generate more than USD 500 mn in annual improvements compared to 2024 actuals and keep yearly Downstream EBITDA at USD 1.4 bn or above beyond 2027.



### 3.4.2 OPERATIONAL OVERVIEW OF 2025

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 changing customer preferences, MOL Group has updated its long-term Shape Tomorrow Strategy in 2024. The higher reliance on renewable energy sources including green hydrogen and biogas is to become an important aspect of attaining low-carbon goals. The means and likelihood of entering these businesses will very much depend on their return profiles and the availability of market-based alternatives. Moreover, the war in Ukraine and the ensuing crisis ongoing ever since highlighted energy security concerns: MOL Group continues to be committed to further diversify its crude mix to be able to switch to alternative blends, should the need arise.

The crude diversification program started in 2022, since then over 15 alternative crude types have been tested. In 2025, the program continued on schedule and full compliance with EU sanctions has been achieved. At the Danube Refinery and in Slovnaft, 2 additional new types of crude oils and their various blends have been processed, further increasing the yearly alternative crude oil processing to 1.2 million tons.

Total crude processing reached 14.6 million tons in Refining, 1.2 million tons above the 2024 level.

**Production** closed the year with significant improvement of availability in Refining (94.5%) driven by strong performance at Slovnaft and INA, and in Petrochemicals (91.5%), despite the challenges posed by the Atmospheric Vacuum Distillation Unit (DCDU3) fire incident at the Danube Refinery. Since 2020, energy consumption has been reduced by an exceptional 0.5–0.6% per year; compared to this trend, the reduction reached 1% in 2025 versus 2024, representing a very strong performance. Cooperation with universities has been further strengthened, leading to joint efforts in the processing of waste-based polymers, various chemical recycling technologies, and the analysis of bio- and synthetic fuels, in collaboration with the University of Pannonia, Budapest University of Technology and Economics, the University of Szeged, the University of Miskolc, and the University of Debrecen. MOL Group's project titled "Research and Development of Renewable and Waste-Based Energy and Chemical Products" was selected among the winners of the Large Enterprise Focus Area Innovation Program and was awarded a non-refundable grant of HUF 3 billion. In 2025, Technology Development continued to investigate the utilization of alternative feedstock in the Group, and initiated successful test runs with bio-based feedstock in INA and Slovnaft Hydrocracker units, producing Sustainable Aviation Fuel. A test run with bio-naphtha was carried out in MOL Petrochemicals, yielding bio polymer product at the end of processing. In 2025, Downstream Research & Development strengthened its activities and projects across three main product fields: Polyols, Polyolefins, and Refining. The Renewable Feedstocks Laboratory organization was established in 2025 to drive the growth towards a more sustainable operation and lead the research of crude oil alternatives for MOL Groups refining and petrochemical industry. These include various pyrolysis oils, waste plastics and bio-feedstocks. Polyol R&D successfully completed the development of three new product recipes and additional grades to support the ongoing production start-up and provides professional guidelines for production process development on commercial lines. The Polyol R&D team is actively participating in customer testing with commercially produced polyols to prepare the ground for market entry, with several successful customer trials already completed. In the Polyol area, the team is also exploring recycling opportunities in line with sustainability objectives. In the Polyolefin area, the focus was on continuing the transformation of the portfolio toward a more sustainable offering. Alongside this main focus, work continued on the development of specialized, low-volume materials with strict quality requirements, often referred to as "high-performance" polymers, which serve specific niche applications, and two new high-performance polymer recipes were developed during the past year. Refining R&D studied and initiated the implementation of new type, waste-based alternative feedstock for fuel production. Several small-scale co-processing lab reactor tests were successfully completed, like in previous years. Following the successful laboratory tests, the unit scale test runs were also performed. This brings the conversion to circular economy closer. Freshly developed hydrotreatment catalysts were investigated and selected for operation in the Danube Refinery. These result in more flexible, economic and reliable fuel production. New Diesel and Gasoline Performance packages together with additive suppliers were also developed to provide better additive performance for the customers, which was confirmed both in laboratory tests and in real engine tests at independent automotive laboratory. Development of special and crude oil based products like bitumen and special engine gasoline were also key projects.

In **Logistics**, the primary focus remained customers satisfaction by providing competitive services, adapting to the everchanging environment, and transforming into a sustainable operation driven by engaged employees. Although 2025 was a challenging year, Logistics was successful in many fields. To support regional supply activity, position and operation in Constance and Koper ports were strengthened by signing long-term contracts as well as a new supply point was opened in Gdansk, Poland. To extend availability on the Romanian market, Logistics is launching its services on new terminals. The extension of new capacities at the Serbian depot has also started. The digitalization path continued with launching Bottomline software with extended scope at INA, and making full upgrade of the COTAS system. The project aiming to ensure continuity of the Logistics backbone system LOGiR was successfully launched. In terms of investments, Logistics' strategic project, the Diesel and Naphtha Interconnector pipeline (which will connect the refineries in Százhalombatta and Bratislava bringing major efficiency in the future) project is progressing according to plan, entering the implementation phase with all key milestones being met on schedule. Overall progress continues to align well with initial expectations, reflecting effective planning and execution across all teams involved. In addition, the crude diversification projects have successfully advanced into the implementation phase, demonstrating strong commitment toward achieving the defined strategic objectives. Sustainability is also a key driver in Logistics. The systematic renewal of the fleet continues, focusing on improved operational efficiency and long term sustainability. These upgrades are already contributing to measurable reductions in GHG emissions, supporting MOL Group's broader decarbonization objectives. In parallel, the energy strategy is followed for fixed assets by consistently tracking and evaluating the impact of all related investments on energy consumption and GHG



emissions. This structured approach ensures that Logistics' capital expenditure decisions align with corporate sustainability targets and reinforce commitment to responsible asset management.

**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 2025, 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. Further progress was made in the Growing Professional Skills (GPS) Development Program with the launch of the New Cycle which involves the largest ever white collar population of Downstream. In addition, 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 2025, Group Fuels operated in a more challenging margin environment yet continued to deliver strong commercial performance across the region. Despite refinery related constraints and increasing market pressure in several markets, the business ensured uninterrupted supply through flexible sourcing, strengthened data-driven planning, and closer cooperation with local teams in all 12 countries. The integration of the Polish and Slovenian companies advanced further, reflected in coordinated country strategies, improved reporting, and enhanced operational processes.

**Group Chemicals** oversees the sale of over 2 million tons of chemical products in more than 200 different product grades, and serves 2,500 customers in six segments (from automotive to packaging) in 55 countries on 4 continents. MOL Group is in the top 10 market players in Europe for many chemical products it sells. Polymer sales reached 957 kt in 2025, a 13% increase (+111 kt) compared to 2024. Despite that, financial performance was negatively impacted by operating in a low integrated margin environment driven by global oversupply and the European economic recession. In spite of these challenging market dynamics, MOL Group successfully regained market positions and achieved a +1.9% price performance improvement (104.5% vs. 102.6%) via shifting portfolio to higher value-added segments. The focus remains on serving strategic segments, improving profitability, reinforcing market resilience, and strengthening customer relationships to further position MOL Group as the preferred regional supplier. Base chemicals sales volume was 667 kt in 2025, which represents a 6% decrease compared to 2024. The main reasons of the sales decline were the continuously challenging external environment (such as the still weak European demand in some segments and strong import competition) and some internal difficulties (including the fire case in Danube refinery). Despite the above mentioned obstacles, MOL Group managed to maintain its market presence and key customers by contract renegotiations, customer portfolio optimization and margin driven decision making.

#### **Polyol Complex**

In 2025, the Polyol Complex made major progress, achieving on-spec Hydrogen Peroxide as well as Propylene Oxide production and successfully commissioning the Ethylene Oxide logistics technology, ensuring safe and reliable operation. Polyol production quality improved steadily throughout the year, with complex process coordination enabling successful on-spec production of the first grades. These advancements lay the groundwork for further developments in 2026, supporting the introduction of additional polyol grades.

#### **Rijeka Refinery Upgrade Project (RRUP)**

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 reached 99% overall completion by the end of 2025. Construction of the key systems of the Delayed Coker Unit has been completed, and comprehensive inspections and pre-commissioning tests are underway to ensure operational readiness. The entire complex, including the new port, is scheduled for start-up in the first quarter of 2026.

### **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.

MOL Group's **biofuel** purchase with regards to both the number of supply points (9 countries) and concluded amount (>600 kilotons) remained stable in 2025 as the national transport compliance mandates did not or hardly change in its core countries compared to 2024. The group of bio components used is similar to those used in the previous year: food- and waste-based bioethanol and fatty acid methyl esters are still serving as basis for decarbonization of the fuels portfolio. In addition, bio components made of advanced feedstocks are further increasing in the portfolio alongside the continuous development of MOL Group's co-processing program: such materials were successfully processed in the co-processing units in Százhalombatta, Bratislava and Rijeka. 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, the sales of Sustainable Aviation Fuel (SAF) has commenced in 2025 in the three core markets – Hungary, Slovakia, and Croatia. MOL Group reached a total of 35,000 tons sold within the year.

MOL Group continued to strengthen its presence in the biogas and biomethane value chain since the 2023 acquisition of the Szarvas biogas plant. The upgrade of the Szarvas facility expected to be finalized by Q4 2026, enabling the plant to produce 7.1 mn m<sup>3</sup> of biomethane annually and inject it into the local natural gas distribution network. MOL Group has also launched its first greenfield Hungarian biomethane investment at Enying. Alongside these projects, MOL Group continues to assess additional biogas and biomethane opportunities across the CEE region to support further value chain expansion.

Green hydrogen continues to play a central role in MOL Group's long term decarbonization strategy. The first 10 MW electrolysis plant at the Danube Refinery completed its commissioning and performance testing, and entered operation in 2025. Since then, it has provided operational learnings that support the development of the Group's upcoming hydrogen initiatives. To further expand its hydrogen footprint, MOL Group is preparing new projects across the region. In Rijeka, construction work has started on a 10 MW electrolyzer, accompanied by an 11 MW solar power plant and a hydrogen logistics center. At the Slovnaft Refinery in Bratislava, a 20 MW electrolyzer installation project is under preparation. The final investment decision will depend on the availability of external financial support, for which an EU funding application has been submitted. These developments support MOL Group's strategic ambition to scale up low carbon hydrogen production and to comply with the European decarbonization requirements.

MOL Group's recycling activities continued to face significant challenges in 2025 due to persistently high energy costs, unfavorable petrochemical market conditions, and weak polymer demand across key sectors. These external pressures particularly affected ReMat Zrt., MOL Group's Hungarian plastic recycling operation, which remained unprofitable despite efficiency measures. As a result, a decision was taken to close ReMat's operations by the end of 2025.

### 3.5 INNOVATIVE BUSINESSES AND SERVICES <sup>(10)</sup>

#### 3.5.1 CONSUMER SERVICES

Consumer Services Segment IFRS results (HUF bn)	FY 2025	FY 2024	Ch %
EBITDA	324.2	271.0	20
<b>EBITDA excl. spec. items<sup>(1)</sup></b>	<b>324.2</b>	<b>271.0</b>	<b>20</b>
Operating profit/(loss)	201.0	193.8	4
<b>Operating profit/(loss) excl. spec. items<sup>(1)</sup></b>	<b>235.2</b>	<b>193.8</b>	<b>21</b>
<b>CAPEX</b>	<b>41.7</b>	<b>64.4</b>	<b>(35)</b>
o/w organic	41.7	64.4	(35)

Consumer Services Total retail sales of refined products (kt)	FY 2025	FY 2024	Ch %
Hungary	1,358	1,395	(3)
Slovakia	817	830	(2)
Poland	635	671	(5)
Croatia	1,532	1,497	2
Romania	792	806	(2)
Czech Republic	520	503	3
Other	865	849	2
<b>Total retail sales</b>	<b>6,518</b>	<b>6,551</b>	<b>(1)</b>

Non-fuel indicators	FY 2025	FY 2024	Ch %
Non-fuel margin share of total (%)	35.4	36.8	(1.4 pp)
Number of Fresh corner sites	1,409	1,329	6

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 2025

In 2025, Consumer Services EBITDA increased by 20% compared to 2024, reaching HUF 324.2 bn. Consumer Services achieved this organic growth despite a decreasing network size, showing the loyalty of our customers and the strength of our non-fuel product offering. By the end of 2025, the total number of service stations was 2,311, out of that Fresh Corner sites increased by 6%, reaching 1,409 service stations. Consumer Services' simplified free cash flow (defined as the difference between EBITDA and organic CAPEX) contribution to the Group increased by 37 percent to HUF 283 bn in 2025.

Fuel margin contributed significantly to results, delivering above 18% increase YoY beside decreasing fuel volume (approx. 1% YoY), while throughput per site remained flat. This is in line with the 1% decrease in the size of the network. Non-fuel turnover grew by 11% while margin rose by 12% YoY. The non-fuel margin share slightly decreased year-on-year to 35.4%.

This means that Consumer Services managed well the decreasing size of the network and utilized the strength of the MOL brand which kept attrition low.

##### 3.5.1.2 OPERATIONAL OVERVIEW OF 2025

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 10<sup>th</sup> country in Europe, Poland, by acquiring 417 service stations with the brand, LOTOS Paliwa based on a set of agreements with PKN Orlen and Grupa LOTOS SA.; on 30<sup>th</sup> 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 2025, MOL maintained a leading position in the Hungarian, Croatian, Slovakian and Bosnian markets, achieved second place in Slovenia, Serbia, while being the third largest market player in the Czech Republic, Montenegro, Romania and Poland as well.

The Group opened 12 new service stations in 2025, Major reconstruction works were completed on more than 130 stations, including forecourt, car- and jet-wash reconstructions and the rollout of the Fresh Corner concept; by the end of 2025 the total number of Fresh Corner sites rose to 1,409. Besides these large-scale rollouts, more than 250 gastro acceleration and more than 160 coffee lifecycle replacement projects were completed during 2025 to further enhance the non-fuel transactions.

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.).

MOL launched the proof of concept kiosks at Nyugati and Déli railway stations in Budapest and also a stand-alone Fresh Corner café/convenience store in Prague city centre. The Kiosks have transformed our standalone vision into reality and surpassed expectations, hitting 160,000 transactions and serving 128,000 hot dogs at the two initial Budapest locations, a testament to the strength of our winning formula bringing the Fresh Corner brand closer to all. In total, MOL now operates 8 stand-alone Fresh Corner outlets.

The Czech Republic became the third market where we operate our own secondary logistics for Non-Fuel. Together with group standard operating systems, it delivers incremental benefit to dynamics in margin, inventory and OPEX.

### 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, 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, 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 and own brand offerings.

Beside monthly tracking we had several thematic researches on our loyalty Customers base (via our internal research system) in order to get to know in details their preferences regarding gastro products, fuelling habits 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 (like seasonal sandwich and hot-dog offers or new coffees), optimized loyalty activities and renewed fuel communication. Furthermore, we have continued to gain Customer insights from one-off, ad-hoc researches such as POS optimization, econometric fuel analysis or gastro personas (based on social media deep dive research).

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 more than 5.6 million representing a 9-times growth from 2021, having 4.3 million yearly active customers with 2.4 million monthly active users (9.1% increase from 2024). During 2025, we further evolved our internal capabilities in gamification resulting higher customer engagement and participation in commercial activities, integration of 3<sup>rd</sup> party propositions with major players in the field of financing, e-commerce and mobility related industries and personalization. With increasing share of the usage of artificial intelligence, we are generating more than 50 million personalized marketing communication messages in a fully automated way which provides higher campaign-level ROI and customer interaction. MOL MOVE's cross-border point collection and offering capabilities are creating a real regional experience across 8 countries. As an external confirmation MOL MOVE was awarded the best loyalty program worldwide in utilities sector (Energy, Gas, Petrol, Service Station, Utilities) after winning the best program award 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.

## eSMILE

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. 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 time. 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 in serving customers, with the primary goal of increasing gastro product sales. In order to enhance the capabilities of the platform, significant changes were introduced at the end of 2025 which will be implemented in Q2/2026. With the new version eSMILE 2.0. It is now becoming a platform, that can be used not just for communication and trainings purposes, but also as a tool for performing business tasks in more efficient way.

## Mobility

In 2018, MOL Group launched MOL Plugee, a new EV charging brand under the Consumer Services division. By year end 2025, 296 MOL Plugee EV chargers were installed throughout the Group's service station network across the CEE region. In 2025 MOL Group installed 8 ultra-fast DC and 6 AC chargers on 5 existing and on 1 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. By the end of 2025, our more than 80,000 registered Plugee users — together with customers of partner networks enabled through roaming — were able to enjoy a seamless charging experience across six countries. In 2024, MOL Plugee launched the virtual fuel card for B2B partners which highly supports the electrification of the business sector. Energy consumption for all EV chargers in 2025 reached 2,900 MWh, saving a total of above 1500 tons of CO<sub>2</sub>-eq.

In 2018, MOL Group launched a car sharing service in Budapest (Hungary) called MOL Limo. By the end of 2025, a fleet of more than 600 shared cars from 12 different models (2 electric, 4 hybrid, 6 ICE) were in operation (number of electric and hybrid vehicles were 337). In 2025, MOL Limo launched its new rent-a-car service, expanding its mobility portfolio beyond traditional car sharing and supporting more flexible, ownership-free travel options. As part of this new service, Limo expanded its offering in 2025 by adding a new vehicle type to the fleet — the Renault Trafic Combi, a nine-seater minibus designed to support the mobility needs of larger groups. In the same year, Limo extended its presence beyond the capital and introduced its service in four major Hungarian cities (Debrecen, Győr, Székesfehérvár and Szeged), where vehicles are available through dedicated Limo points located at local MOL service stations. The client base is continuously growing, until the year-end total number of registered users reached over 140 thousand. Energy consumption of all LIMO EVs reached 48,300 kWh in 2025, saving an equivalent of around 25 tons of CO<sub>2</sub>-eq. per year.

KEY MOL LIMO SUSTAINABILITY FIGURES	UNIT OF MEASURE	FY 2025	FY 2024
Average fleet size	number of vehicles	586	563
o/w electric (BEV, HEV)	percentage	57.5	42.1
Average vehicle age at year end	in months	33.6	36.6
Vehicles rated by Euro NCAP programs with an overall 5-star safety rating	percentage of fleet	46	60
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 Group reached an agreement with Mercarius, one of Hungary's largest and fastest-growing vehicle fleet management companies. Under this agreement, MOL Fleet Solution and Mercarius have established a joint company, MOL Mercarius, which became the second-largest player in the Hungarian fleet management market.

KEY MOL MERCARIUS SUSTAINABILITY FIGURES	UNIT OF MEASURE	FY 2025	FY 2024 (MOL Fleet)
Average managed fleet size at year end	number of vehicles	21,594	6,911
o/w electric (BEV, HEV)	percentage	16.2	8.1
Average vehicle age at year end	in months	45.3	31.9
Vehicles recalled during period	number	0	0

### 3.5.2 GROUP INDUSTRIAL AND CORPORATE SERVICES

The organization oversees the Group Maintenance Services Management, Group Renewables & Energy Efficiency, ITK Group, as well as Group Procurement, Asset & Services Management and the MOL Campus Organizations.

In 2025 a number of high complexity turnarounds have been executed in Danube Refinery and smaller technical shutdowns in Slovnaft. While the core focus of the Maintenance Single Service Companies is the safe, reliable and sustainable work execution, in Danube Refinery the turnaround works has suffered notable delays, as well as the Total Recordable Injury Rate has exceeded the ceiling levels, both needs significant attention during 2026. Despite under-deliveries on planned actions, the Maintenance Organizations has contributed positively to resolve various unplanned shutdowns during the year, enabling operations uptime. Group Maintenance Service Management has progressed further on its digital roadmap delivery, towards higher productivity.

Group Renewables' EBITDA generation was above the planned level, while expanded the portfolio with the acquisition of an asset of 304 MWp in Mezőcsát, for which a sale and purchase contract was signed in December 2025, and progressed well also on the endorsed renewable and energy storage projects – with focus on covering own energy consumptions.

ITK Group has further dissolved non value generating activities, continued focusing on core activities and delivered a positive Profit After Tax performance.

Group Procurement has dedicated significant efforts to maintain a healthy demand-supply and cost-value balance across MOL Group various geographies, with an increased focus on regulatory compliance and sustainability.

Group Asset & Services Management and the MOL Campus organization has progressed on their defined roadmap, delivered several office and facility renewal programs, assuring a functional environmental for staff and business partners.

### 3.5.3 CIRCULAR ECONOMY SERVICES

Segment IFRS results (HUF bn)	FY 2025	FY 2024	Ch %
EBITDA	(11.3)	(20.3)	(44)
<b>EBITDA excl. spec. items<sup>(1)</sup></b>	<b>(11.3)</b>	<b>(20.3)</b>	<b>(44)</b>
Operating profit/(loss)	(29.0)	(33.4)	(13)
<b>Operating profit/(loss) excl. spec. items<sup>(1)</sup></b>	<b>(29.0)</b>	<b>(33.4)</b>	<b>(13)</b>
<b>CAPEX</b>	<b>37.3</b>	<b>34.1</b>	<b>9</b>

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

#### Full year 2025 results

Circular Economy Services delivered a loss on EBITDA level in 2025 amounting to HUF -11.3 bn and marking a HUF 9.0 bn improvement over the previous year. This advancement is mostly thanks to the MOHU Budapest JV, as it supported the segment financials with one additional quarter's EBITDA (since the JV started its operation in Q2 2024), thus it contributed a complete year's result. Furthermore, an increase in third party electricity and heat sales also supported the improvement in segment EBITDA. There was an upturn also in MOHU Zrt. results, however the company is still lossmaking. The increase in EBITDA is mostly attributable to the realization of the first results of efficiency improvement measures on the cost side in the latter parts of the year, being partially offset by a shift towards separate waste collection and treatment, which is a more expensive value chain, compared to mixed waste's.

The Deposit Return System reached a significant milestone, as in its first whole operational year, the number of returned bottles surpassed 3 billion pieces, which translates into an 88.8% return ratio. It also meant that in case of plastic beverage bottles, the relevant target of the European Union's SUP Directive for the year has been fulfilled.

#### CES business development

In 2025, Circular Economy Services segment's capital expenditure amounted to HUF 37.3 bn, which is HUF 3.2 bn, or 9% higher than in the previous year. The spending was mostly directed to the intensification of separate waste collection, and improving the waste collection infrastructure in Hungary. The Deposit Refund System's coverage and availability was improved by purchasing 900 reverse vending machines (RVMs), thus having installed a total of 4,000 RVMs by the end of the year, which amount for 4,600 deposit stations. The number of contracted manual takeback points grew as well, to 1,700.

The modernization of waste collection infrastructure progressed likewise. As part of the waste yard development program, the Komárom facility was reconstructed during the year, and started its operation in the last quarter. Within scope of the textile waste collection extension project, almost 1,000 new containers had been ordered in 2025, of which 800 have already been installed.

Improving the efficiency of the national waste collection vehicle fleet remained a priority for the segment. During the year, 124 new vehicles were delivered, majority of which had been handed over to partners, to put into service. Additionally, further specialized collection vehicles were purchased as well, including 24 mobile waste yards for a pilot project, and 22 vehicles intended to support and improve bio kitchen waste collection.



### 3.6 MIDSTREAM

Segment IFRS results (HUF bn)	FY 2025	FY 2024	Ch %
EBITDA	73.8	89.0	(17)
<b>EBITDA excl. spec. items <sup>(1)</sup></b>	<b>73.8</b>	<b>89.0</b>	<b>(17)</b>
Operating profit/(loss)	56.8	72.4	(22)
<b>Operating profit/(loss) excl. spec. items <sup>(1)</sup></b>	<b>56.8</b>	<b>72.4</b>	<b>(22)</b>
<b>CAPEX and investments</b>	<b>17.8</b>	<b>17.8</b>	<b>0</b>
o/w organic	17.8	17.8	0

Key Gas Midstream ESG Indicators	Unit of measure	FY 2025	FY 2024
Total Direct GHG emissions (scope 1)	mn tonnes CO <sub>2</sub> eq	0.1	0.1
Volume of Spills (> 1m <sup>3</sup> )	m <sup>3</sup>	0	0
Lost Time Injury Frequency (own staff)	per 1 mn worked hours	3.41	0

Tables regarding transmission volumes (million cmc) are available in the annual [Data Library](#) on the company's website. Gas midstream contains two companies' (FGSZ and aggregated value CEEGEX) aggregated values.

#### 3.6.1 FINANCIAL OVERVIEW OF 2025

Gas Midstream reached HUF 73.8 bn EBITDA in 2025 following a 17% decrease from 2024. The financial result was determined by robust, elevated demand for transmission activities, changes in regulated tariffs and macroeconomic drivers (ie. inflation pressure, calming energy prices).

Transmission volumes climbed by 18% compared to prior year as both domestic transmission and export flows to neighbouring countries rose significantly. The nearly 12% increase in total domestic volumes was based on two main factors: a) more intensive storage utilization as opening stock levels were relatively low in early 2025, injected volumes rose by +42% compared to a low basis value from previous year; b) domestic transmission rose by 6% in relation with macroeconomic and average weather conditions. Regional gas supply routes strengthened further: the southern route played significant role in the gas supply of Slovakia and Ukraine as well, which resulted further increase in cross-border flows as the export transmission demand towards neighbouring countries (e.g. Croatia, Romania, Slovakia, Serbia and Ukraine) increased by 30% in 2025 compared to prior year.

Regulated revenues decreased by 11% year-over-year mainly due to unfavourable changes in regulatory environment and changes in capacity portfolio of system users. Average regulated tariffs decreased further compared to 2024 by 25% year-over-year, mainly reflecting the easing external economic environment. Overall capacity demand for domestic and cross-border transmission increased in line with growing transmission volumes, while excess demand for cross-border capacity products was more balanced compared to prior year. Operating expenses were higher by 23% year-over-year in line with significantly higher gas consumption costs of the transmission system, while other OPEX elements (e.g. costs of maintenance activities) were pushed by macroeconomic factors. Strict cost control smoothened the overall impact of the operational expenditures.

The total value of CAPEX and investments reached similar level year-over-year. In 2025 CAPEX spending covered mainly sustain-type projects (e.g. pipeline rehabilitation, reconstruction of compressor units) and the completion of domestic production connection points, at the same time to support the green transition, FGSZ also completed renewable gases and energy efficiency projects.

#### 3.6.2 OPERATIONAL OVERVIEW OF 2025

FGSZ (Földgázszállító Ltd.) 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 under regulated market conditions, in compliance with EU and national rules. 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, within the framework of the European gas market cooperation based on mutual advantages, FGSZ aims to ensure the smooth interoperability of the natural gas transmission networks of the region, and it also strives to increase transmission flows through Hungary, as it did happen in 2025 compared to delivered volumes of 2024. The developments of the transmission grid and trade infrastructure implemented by FGSZ in recent years have contributed to a more competitive gas market Hungary and the wider region, while enhancing security of supply and improving access to natural gas as a lower carbon alternative, including for electricity generation.

To further enhance regional gas market integration, FGSZ completed several important agreements and developments on its network in 2025. To meet further market demand, the technical capacity of the Hungarian - Slovak interconnection point was additionally increased towards Slovakia in 2025 from 400 tcm/h to 500 tcm/h. Also, from November 2025 the technical capacity of the Hungarian - Romanian interconnection point was increased (from 300 tcm/h to 310 tcm/h) in both directions. Both developments were results of optimization efforts of the TSO. FGSZ became a strategic investor of the Hungarian gas exchange, Central Eastern European Gas Exchange Ltd. (CEEGEX), in 2024. To support the further growth and stability of CEEGEX the Company increased its initial stake of 51% to 74,8% in 2025. In parallel, having consolidated the operations of the trading platforms operated by CEEGEX Zrt. and by FGSZ KP Ltd., FGSZ (as the owner) has decided to discontinue the business services offered by FGSZ KP Ltd. in 2025; thus CEEGEX became the single trading platform service provider entity in Hungary as of January 2026.

Internal system development is also crucial for FGSZ, recently opened 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 2025, exploring the adaptation of the existing transmission system to changing needs and to the transport of renewable gases (biomethane, hydrogen) continued to be of crucial importance. To make the current operations more sustainable, FGSZ has incorporated and performing methane leakage detection and repair activities into daily operations to reduce greenhouse gas emissions. For the fourth consecutive year, FGSZ has been a member of the Oil and Gas Methane Partnership (OGMP 2.0) international initiative, which has once again awarded FGSZ the highest level of recognition (the Gold Standard) for meeting the strictest methane reporting requirements in 2025. Building on more than a decade of established operational philosophy in flaring system management, FGSZ continues to enhance its practices through continuous technological development. As a result, flaring is increasingly preferred over blowing off, as this process converts most methane emissions into CO<sub>2</sub>, thereby significantly reducing overall 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), NEL (Germany), Ontras (Germany), Gaz-System (Poland), Gas TSO of Ukraine (Ukraine), Gastrans (Serbia), ICGB (Bulgaria), Hexum (storage, Hungary), Vestmoldtransgaz (Republic of Moldova) and Moldavtransgaz (Republic of Moldova). In 2025, RBP introduced novel concept of route capacity bundling on the Transbalkan pipeline enabling the one-stop-shop capacity booking between Greece and Ukraine.



## 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 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
Operating profit excl.spec.items from continuing operation	517,336	603,824	(14)	1,450	1,663	(13)
Upstream	(46,660)	(18,952)	n.a	(142)	(48)	n.a
Impairment on Upstream assets in the Group	(46,660)	(18,952)	n.a	(142)	(48)	n.a
Consumer Services	(34,188)	-	n.a	(104)	-	n.a
Impairment of Retail Assets	(34,188)	-	n.a	(104)	-	n.a
Total impact of special items on operating profit from continuing operation	(80,848)	(18,952)	n.a	(246)	(48)	n.a
Operating Profit from continuing operation	436,488	584,872	(25)	1,204	1,615	(25)

Special items - EBITDA	FY 2025	FY 2024	Ch %	FY 2025	FY 2024	Ch %
EBITDA excl.spec.items from continuing operation	1,077,782	1,091,314	(1)	3,048	2,992	2
Total impact of special items on EBITDA from continuing operation	-	-	n.a	-	-	n.a
EBITDA from continuing operation	1,077,782	1,091,314	(1)	3,048	2,992	2

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)	Including LPG and other gas products.
(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)	Excluding separated condensate.
(9)	Figures and analysis of Consumer Services performance are presented in chapter 3.5. ("Innovative businesses and services").
(10)	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.
(11)	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.
(12)	FOB Rotterdam parity
(13)	FOB Med parity
(14)	The methodology includes purchased energy (enhanced fit to natural gas) and CO2 costs.
(15)	Variable MOL Group Petrochemicals margin contains an energy cost component and is the only petrochemicals margin MOL reports starting in Q1 2024.

## 5. DISCLOSURE OF OTHER INFORMATION REQUIRED BY ACT C. OF 2000. ON ACCOUNTING

The utilization of the Group's financial instruments are disclosed in section 21. and 22. in the Consolidated Financial Statements.

Significant events and particularly important developments which took place after the balance sheet date are disclosed in section 29. in the Consolidated Financial Statements.

Sustainability statement is presented in a separate section in MOL Group's Integrated Annual Report.

MOL Group's significant business premises and branches:

Company name: MOL Plc.

Registered address: HU – 1117 Budapest, Dombóvári út 28.

Company name: MOL Nyrt. (Danube Refinery)

Registered address: HU – 2440 Százhalombatta, Olajmunkás utca. 2.

Company name: MOL Petrolkémia Plc.

Registered address: HU – 3581 Tiszaújváros, TVK-Ipartelep; HU – 3580 Tiszaújváros, Mezőcsáti u. 1. TIFO- Ipartelep gyártelep 3322.

Company name: Slovnaft, a.s.

Registered address: SK - Vlčie hrdlo 1, 824 12 Bratislava, Slovakia.

Company name: INA – Industrija nafte d.d.

Registered address: HR - Avenija Većeslava Holjevca 10, p.p. 555, 10 020 Zagreb, Croatia (HQ); HR – 51221, Urinj, Horvátország (Refinery).

# CORPORATE GOVERNANCE

## TABLE OF CONTENT

<b>CORPORATE GOVERNANCE</b> .....	<b>36</b>
1. INTRODUCTION WITH LINKS TO THE CORPORATE GOVERNANCE DECLARATION.....	36
2. THE OPERATION OF THE BOARD OF DIRECTORS .....	36
3. INTRODUCTION OF THE BOARD OF DIRECTORS AND ITS COMMITTEES.....	38
4. OPERATIONS OF THE BOARD AND NUMBER OF MEETINGS FOR THE BOARD AND EACH COMMITTEE .....	39
5. INTRODUCTION OF THE SUPERVISORY BOARD AND THE AUDIT COMMITTEE .....	40
6. MANAGEMENT MEMBERS OF CEC AND MC.....	41
7. GOVERNANCE AROUND CLIMATE RELATED RISKS AND CHALLENGES .....	41
8. REMUNERATION POLICIES AND PRACTICES .....	42
9. CORPORATE AND SHAREHOLDER INFORMATION .....	45

## 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 activities 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, the Group Industrial & Corporate Services Vice President, and the Group Circular Economy Services Executive Vice President.

The CEC, being the regular forum of the four 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, the Deputy Chief Executive Officer and the Group Chief Strategic 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 2025, 6 members of the Board of Directors were independent in accordance with their related declaration (based on NYSE and EU recommendations):

Name	Status	Election Year	BOARD AND COMMITTEE MEMBERSHIP			
			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	
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
	60%			75%	80%	67%

CH: Chairman / DEP.CH: Deputy Chairman / M: Member

#### 3.1.1 PRESENTATION OF THE STRUCTURES OF THE BOARD'S COMMITTEES

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	
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

#### 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

**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. The Chairman of the Board of Directors, the Chairman of the Supervisory Board and the Chairperson of the Audit Committee are permanent invitees to the meetings of the Finance and Risk Management Committee.

## 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. The Chairman of the Board of Directors, the Chairman and Deputy Chairperson of the Supervisory Board are permanent invitees to the meetings of the Sustainable Development Committee.

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

In 2025, the Board of Directors held 6 meetings with an average attendance rate of 98%. Attendance to the Board of Directors meetings during 2025 is set out in the table below:

Name	BoD		CGRC		FRC		SDC	
	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio
Zsolt Hernádi (Chairman)	6	100%	6	100%				
Dr. Sándor Csányi (Deputy Chairman)	6	100%	6	100%				
Zsigmond Járai	6	100%			5	100%		
József Molnár	6	100%			5	100%		
Dr. László Parragh	6	100%			5	100%	4	100%
Dr. Anthony Radev	6	100%	6	100%	5	100%		
Dr. Martin Roman	6	100%	4	67%				
Talal Al-Awfi	6	100%			5	100%	3	75%
JUDr. Oszkár Világi	5	83%						
Dr. György Bacsa	6	100%					3	75%
	6	98%	6	92%	5	100%	4	100%

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 and the strategy update process.

In 2025, the **Corporate Governance and Remuneration Committee** held 6 meetings with a 92% 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 2025, 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 2025, the **Sustainable Development Committee** held 4 meetings with an 83% attendance rate. The Committee evaluated the accomplishment of the sustainability related actions taken in 2025. 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 eleven (11) members. In accordance with the Civil Code, one third of the members shall be representatives of the employees, accordingly currently four (4) members of the MOL Supervisory Board are employee representatives while the other seven (7) external persons are appointed by the shareholders.

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

Name	Status	SUPERVISORY BOARD		AUDIT COMMITTEE	
		Number of Meetings	Attendance Ratio	Number of Meetings	Attendance Ratio
Zoltán Áldott, Chairman	non-independent	6	100%		
Dr. Anett Pandurics, Deputy Chairperson	independent	6	100%	5	100%
Péter Bíró	independent	4	67%	2	40%
Dr. Lajos Dorkota	independent	5	83%		
Norbert Izer*	independent	3	100%	3	100%
Dr. Péter Kaderják	independent	6	100%		
András Láncki	independent	6	100%		
Ivan Mikloš	independent	5	83%	4	80%
Employee representatives:					
Bálint Péter Kis	non-independent	6	100%		
Dr. Sándor Puskás	non-independent	6	100%		
Kálmán Serfőző**	non-independent	1	50%		
András Tóth	non-independent	6	100%		
Csaba Szabó***	non-independent	1	100%		

\* Norbert Izer resigned from his position with an effective date of 24 June 2025.

\*\* Due to the termination of Kálmán Serfőző's employment his position in the Supervisory Board was also terminated with an effective date of 9 June 2025.

\*\*\* The 2025 General Meeting appointed Csaba Szabó as member of the Supervisory Board from 28 November 2025.

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 2025 the **Supervisory Board** held 6 meetings with an 91% average attendance rate. Attendance to the Supervisory Board meetings during 2025 is set out in the table above. In 2025, the **Audit Committee** held 5 meetings with a 80% average attendance rate. Attendance to the Audit Committee meetings during 2025 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	Deputy Chief Executive Officer
Dr. György Bacsa	Group Chief Strategic Officer from September 2025

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) until August 2025, Group Circular Economy Services Executive Vice President from August 2025
Gabriel Szabó	Group Downstream Executive Vice President, C-CEO of SLOVNAFT a.s. from December 2025
Dr. György Bacsa	Group Strategic Operations and Corporate Development Executive Vice President, MOL Hungary Managing Director
Péter Labancz	Group Industrial & Corporate Services Senior Vice President
Dr. Ákos Székely	Group Chief Financial Officer (GCFO) from August 2025

## 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.

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 2025:

#### 8.1.1 SHORT TERM INCENTIVE SYSTEM (STI)

Short term Incentive is calculated as percentage 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 2025, 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 2025, 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 2025:

- ▶ 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 further increasing employee engagement to make MOL Group the best choice for employees, as well as fostering a collaborative culture and employee experience, diversity and inclusion, and talent management within the organization.
- ▶ Further strengthening the safety culture of MOL Group by emphasizing our HSE commitment and supporting the safety awareness program
- ▶ Further enhance sustainability aspects of MOL Group operations, further improve business efficiency and increase productivity in the respective areas

For MC members the individual targets set were aligned with the 2025 business plan and priorities for the given Division / 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 Rész tulajdonosi 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 INVENTIVE

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 2021	Volume-weighted average of daily MOL share price of December 2023	Payout
2022	2 441 HUF	2 669 HUF	From MRP in shares in January 2025

### 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.

## 9. 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 2025:** 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

	31.12.2025		31.12.2024	
	Par value of shares (HUF th)	%	Par value of shares (HUF th)	%
Foreign investors	29,638,866	28.94	29,817,181	29.11
Hungarian State	1	0.00	1	0.00
MOL New Europe Foundation	10,744,499	10.49	10,744,499	10.49
Maecenas Corvini Foundation	10,242,868	10.00	10,242,868	10.00
Mathias Corvinus Collegium Foundation	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.	5,014,942	4.90	5,014,314	4.90
OTP Fund Management	467,340	0.46	406,268	0.40
ING Bank N.V.	3,875,000	3.78	3,875,000	3.78
UniCredit Bank AG	3,875,000	3.78	3,875,000	3.78
Commerzbank AG	834,502	0.81	834,502	0.81
Domestic institutional investors	10,783,054	10.53	9,722,956	9.49
Domestic private investors	6,292,518	6.14	6,956,835	6.79
MOL Plc (treasury shares)	2,274,751	2.22	2,553,918	2.49
<b>Total</b>	<b>102,428,683</b>	<b>100.00</b>	<b>102,428,683</b>	<b>100.00</b>

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](http://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 2025.

Period	BSE volume (no. of shares)	BSE closing price (HUF/share)
1 <sup>st</sup> quarter	36,967,989	2,930
2 <sup>nd</sup> quarter	46,050,334	2,954
3 <sup>rd</sup> quarter	35,160,426	2,698
4 <sup>th</sup> quarter	37,230,406	2,940

## TREASURY SHARES

During 2025 the following treasury share transactions happened:

Reasons for change	Number of "A" series Ordinary shares
<b>Number of Treasury shares on 31 December 2024</b>	<b>20 426 715</b>
MOL transferred Treasury shares to MOL Plc ESOP Organization	(2 336 609)
MOL Plc ESOP Organization transferred MOL shares to MOL Plc. (2 times)	306,423
Share distribution for the members of the Board of Directors and the management	(203,146)
<b>Number of Treasury shares on 31 December 2025</b>	<b>18 193 383</b>

In 2025 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 three-quarter 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 24 April 2025 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 2025 Annual General Meeting made the following resolutions:

- ▶ elected Dr. László Parragh as member of the Board of Directors from 1 May 2025 to 30 April 2030.
- ▶ elected Mr. Zsigmond Járai as member of the Board of Directors from 1 May 2025 to 30 April 2030.
- ▶ elected Dr. Martin Roman as member of the Board of Directors from 1 May 2025 to 30 April 2030.

As of 15 August 2025, József Simola left his position as Group Chief Financial Officer (GCFO) and continued his career as Executive Vice President of the Circular Economy Services segment at MOL Group. At the same time, Dr. Ákos Székely was appointed to lead MOL's finance organization as Group Chief Financial Officer.

## MOL SECURITIES HELD BY DIRECTORS AND OFFICERS OF THE COMPANY AS OF 31 DECEMBER 2025

Name	Current position	Number of MOL shares
Zsolt Hernádi*	Chairman of the Board of Directors, Chairman-CEO (C-CEO)	818,549
Dr. Sándor Csányi**	member of the Board of Directors, Vice-Chairman	48,000
József Molnár	member of the Board of Directors, Group Chief Executive Officer (GCEO)	312,613
Dr. Bacsa György***	member of the Board of Directors, Executive Vice President, Group Strategic Operations and Business Development, MOL Hungary COO	103,776
Talal Al-Awfi	member of the Board of Directors	30,305
Zsigmond Járai	member of the Board of Directors	165,120
Dr. László Parragh	member of the Board of Directors	83,960
Dr. Anthony Radev	member of the Board of Directors	160,072
Dr. Martin Roman	member of the Board of Directors	67,200
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.	415,628
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 Láncki	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	14,768
Marek Senkovic	CEO & Head of Downstream of SLOVNAFT	0
Marton Zsombor	Executive Vice President, Upstream	60,763
Péter Ratatics	Executive Vice President, Consumer Services	80,000
József Simola	Executive Vice President, Circular Economy Services	0
Gabriel Szabó	Executive Vice President, Downstream	0
Dr. Ákos Székely	Group Chief Financial Officer (GCFO)	0
Péter Labancz	Vice President for Industrial and Corporate Services	0
Zsuzsanna Ortutay	President of the Management Board, INA d.d.	14,000

\* Mr. Zsolt Hernádi owns 818,549 shares directly and 1,463,545 shares indirectly via Continuum Vagyonkezelő Alapítvány.

\*\* Dr. Sándor Csányi owns 48,000 shares directly and 2,648,833 shares indirectly via Unity Vagyonkezelő Alapítvány.

\*\*\* Dr. György Bacsa owns 103,776 shares directly and 85,000 shares indirectly via Legatum Bacsa 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

### CORPORATE ADDRESS

MOL Hungarian Oil and Gas Public Limited Company (MOL Plc.)

H-1117 Budapest, Dombóvári út 28.

H-1502 Budapest, Pf.: 22

Phone: (+36-1) 209-0000, 209-1010, 209-2020

### SHARE REGISTRAR

KELER Zrt.

H-1074 Budapest, Rákóczi u. 70-72.

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

E-mail: [rko@keler.hu](mailto:rko@keler.hu)

### STOCK EXCHANGE TRADING INFORMATION

Budapest Stock Exchange

H-1013 Budapest, Krisztina krt. 55.

Phone: (+36-1) 429-6857

Fax: (+36-1) 429-6899

E-mail: [info@bse.hu](mailto:info@bse.hu)

### WARSAW STOCK EXCHANGE

Giełda Papierów Wartościowych w Warszawie S.A.

4 Książęca Street 00-498, Warsaw Poland

Phone: (+4822) 628 32 32

Fax: (+4822) 628 17 54

E-mail: [gpw@gpw.pl](mailto:gpw@gpw.pl)

### DR INFORMATION

The Bank of New York Mellon

Mira Daskal

240 Greenwich Street, 8 West New York, NY 10286

Phone: +1 212 815 5021

Fax: +1 732 667 9098

Email: [mira.daskal@bnymellon.com](mailto:mira.daskal@bnymellon.com)

### INVESTOR RELATIONS AND ESG COORDINATION

H-1117 Budapest, Dombóvári út 28.

E-mail: [investorrelations@mol.hu](mailto:investorrelations@mol.hu)

### Group Investor Relations and ESG Coordination Manager

Márton Teremi

E-mail: [mteremi@mol.hu](mailto:mteremi@mol.hu)



# SUSTAINABILITY STATEMENT

## TABLE OF CONTENTS

GENERAL DISCLOSURES.....	50
CLIMATE CHANGE AND ENERGY.....	69
EU TAXONOMY REPORT.....	87
POLLUTION.....	95
WATER STEWARDSHIP.....	105
BIODIVERSITY AND ECOSYSTEMS.....	110
RESOURCE USE AND CIRCULAR ECONOMY.....	115
Sub-chapter A: Handling of Own Waste.....	117
Sub-chapter B: Resource use of the Downstream segment.....	121
Sub-chapter C: Management of impacts, risks, and opportunities related to circular economy services.....	124
WORKFORCE.....	130
Sub-chapter A: Human Resource Management.....	132
Sub-chapter B: Worker Health and Safety Management.....	138
Sub-chapter C: Ethics.....	150
AFFECTED COMMUNITIES.....	159
Sub-chapter A: Managing Impacts and Risks Related to Local Communities.....	161
Sub-chapter B: Shared Wealth and Economic Impact.....	167
CONSUMERS AND END-USERS.....	169
BUSINESS CONDUCT.....	174
Sub-chapter A: Ethical Business Conduct.....	175
Sub-chapter B: Supply Chain Management.....	180
Sub-chapter C: Data Protection and Cyber Security.....	183
APPENDIX I: OMITTED DISCLOSURE REQUIREMENTS FROM ENVIRONMENTAL, SOCIAL AND GOVERNANCE STANDARDS.....	186
APPENDIX II: MINIMUM DISCLOSURE REQUIREMENTS - POLICIES REFERENCED IN THE SUSTAINABILITY STATEMENT.....	187
ASSURANCE STATEMENT.....	193
INDEPENDENT AUDITOR'S REPORT.....	HIBA! A KÖNYVJELZŐ NEM LÉTEZIK.
FINANCIAL INSTRUMENTS, CAPITAL AND FINANCIAL RISK MANAGEMENT.....	HIBA! A KÖNYVJELZŐ NEM LÉTEZIK.

## GENERAL DISCLOSURES

/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 20 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, relevant metrics are reported after the first full year of consolidation. 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.

During the preparation of the sustainability report, MOL Group did not use the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation or the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in article 29a(3) of Directive 2013/34/EU.

#### Assurance

Deloitte provided limited assurance over the sustainability statement. Further information can be found in the auditor's assurance report, available on the company's official website.

### DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

/BP-2/

#### Changes in preparation or presentation of sustainability information

From this year, MOL Group includes MOHU MOL Hulladékgazdálkodási Zrt., MOHU Budapest Zrt., ITK Holding Zrt. and its subsidiaries, Aufwind Schmack Első Biogáz Kft., Aurora Kunststoffe GmbH, MOL Polska Sp. z o. o., Mercarius Flottakezelő Zrt., and several NHSZ companies in metrics of Environment chapters and Health and Safety chapters of this report. The listed entities are under the aforementioned HSE integration period, and thus are not yet included in Group-level targets. In case of the relevant metrics, the separate boundaries (consolidated entities and entities under HSE MS) are mentioned throughout the report.

Due to the unbundled nature of FGSZ Zrt., MOL Group's Midstream company, FGSZ Zrt. was included in the Group's sustainability report for the first time in 2024. 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.

## Time horizons

During the preparation of the sustainability statement, including the Double Materiality Assessment described in this chapter, MOL Group uses the time horizons established by the European Sustainability Reporting Standards.

## 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.

## Restatements

MOL Group did not identify any need to restate previously disclosed information.

## ROLE, COMPOSITION, AND EXPERTISE OF ADMINISTRATIVE, MANAGEMENT, AND SUPERVISORY BODIES

/GOV-1/

### Composition and diversity of governance bodies

MOL Group's governance structure is based on a dual board system, comprising the Board of Directors (BoD) as the administrative and management body, and the Supervisory Board (SB) as the supervisory body. The BoD is responsible for the strategic management and oversight of the Group, while the SB supervises the activities of the BoD on behalf of shareholders.

As of the end of 2025, the BoD consisted of 10 members, including both executive and non-executive directors. The majority are non-executive, with a clear separation between management and oversight functions. The Board's composition reflects a balance of skills, experience, and independence, in line with the MOL Group Policy on Director Nominations and the Charter of the Board of Directors. MOL Group is committed to diversity at the highest governance levels. The Group considers several aspects of diversity, such as gender, age, nationality, and professional background, in line with its Policy on Director Nominations.

The SB comprised 11 members, including employee representatives, as required by law. The SB's composition ensures representation of key stakeholder groups, including employees, and brings together expertise from various sectors and geographies relevant to MOL Group's operations.

The percentage of independent board members is determined according to the MOL Group Independence Criteria. For the BoD, 60% of non-executive directors were classified as independent. For the SB, 55% of members were independent, ensuring robust oversight and avoidance of conflicts of interest.

Board and SB members collectively possess extensive experience in the energy sector, finance, legal, ESG, and international business, covering the full geographic scope of MOL Group's operations. Employee representatives contribute practical operational insights.

### Diversity of the Supervisory Board and Board of Directors

	UNIT OF MEASURE	2025	2024	ESRS
<b>Board of Directors</b>				ESRS 2 – GOV-1
Number of Board members	number	10	10	ESRS 2 – GOV-1
Number of independent Board member	number	6	6	ESRS 2 – GOV-1
Percentage of independence	%	60	60	ESRS 2 – GOV-1
<b>Supervisory Board</b>				ESRS 2 – GOV-1
Number of Board members	number	11	12	ESRS 2 – GOV-1
/ow employee representatives	number	4	4	ESRS 2 – GOV-1
Number of Independent Board Members	number	6	7	ESRS 2 – GOV-1
Percentage of independence (incl. empl. rep.)	%	55	58	ESRS 2 – GOV-1
Percentage of Independence (excl. empl. rep.)	%	86	88	ESRS 2 – GOV-1
<b>Supervisory Board and Board of Directors by gender</b>				ESRS 2 – GOV-1
Male	%	95	95.5	ESRS 2 – GOV-1
Female	%	5	4.5	ESRS 2 – GOV-1
<b>Supervisory Board and Board of Directors by citizenship</b>				ESRS 2 – GOV-1
Hungarian	%	82	82	ESRS 2 – GOV-1
Slovak	%	9	9	ESRS 2 – GOV-1
Croatian	%	0	0	ESRS 2 – GOV-1
Omani	%	5	4.5	ESRS 2 – GOV-1
Czech	%	5	4.5	ESRS 2 – GOV-1
<b>Supervisory Board and Board of Directors by age groups</b>				ESRS 2 – GOV-1
Below 30 years of age	%	0	0	ESRS 2 – GOV-1

	UNIT OF MEASURE	2025	2024	ESRS
Between 30-50 years of age	%	10	18.2	ESRS 2 – GOV-1
Over 50 years of age	%	90	81.8	ESRS 2 – GOV-1

### Roles and responsibilities in sustainability governance

The BoD is ultimately responsible for the oversight of sustainability matters, including the management of material impacts, risks, and opportunities (IROs). The Board delegates detailed oversight to its Sustainable Development Committee (SDC), which reviews and monitors the Group's sustainability strategy, targets, and performance. The SDC meets regularly and reports to the full Board.

The responsibilities of the Board of Directors for overseeing sustainability-related impacts, risks and opportunities are explicitly embedded in the Charter of the Board of Directors, which mandates the Board to supervise long-term value creation, risk management, and compliance with environmental, social and governance (ESG) standards. The Charter requires the BoD to review and approve key sustainability-related policies, including climate, HSE, and ethical conduct frameworks, and to ensure that sustainability considerations are integrated into strategic planning and capital allocation.

The mandate of the Sustainable Development Committee (SDC) defines its role in monitoring MOL Group's material sustainability impacts, reviewing and approving the Double Materiality Assessment, and overseeing the implementation of sustainability policies and targets. The SDC's Terms of Reference require regular evaluation of sustainability-related risks, including climate transition and physical risks, as well as opportunities linked to energy transition and circular economy. The Financial Risk Committee (FRC) monitors financial and operational risks, including the Enterprise Risk Management (ERM) system, which is a key part of analysing sustainability related impacts, risks, and opportunities.

The Supervisory Board's oversight responsibilities, as defined in its Terms of Reference, include monitoring the effectiveness of internal control and risk management systems, which explicitly cover ESG-related risks, compliance, and the integrity of sustainability reporting. The SB, through its Audit Committee, monitors the effectiveness of internal controls and risk management systems, including those related to sustainability and ESG risks. The SB also reviews the annual sustainability statement and provides feedback to the BoD.

Executive management at MOL Group assesses and manages climate-related risks across various roles, including Group Strategy and Sustainability, 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.

Day-to-day management of sustainability reporting and strategy is delegated to the Group Chief Strategic Officer and the Group Vice President of Strategy & Sustainability. They are responsible for integrating sustainability into the Group's strategy and operations, and oversee the development and implementation of ESG policies, targets, and reporting. The VP of Strategy & Sustainability ensures regular reporting to the SDC and BoD.

Specific sustainability-related responsibilities are further delegated to management-level committees and positions, such as the ESG Coordination team, HSE (Health, Safety, Environment) management, and business line sustainability leads. Oversight is exercised through regular reporting lines, internal audits, and dedicated controls and procedures, which are integrated with other internal functions (e.g., risk management, compliance, internal audit).

The BoD and SDC oversee the setting of sustainability-related targets, including climate, safety, and social objectives. Progress is monitored through regular performance reviews, with key performance indicators (KPIs) reported to the Board and disclosed publicly.

### Access to and development of sustainability 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 meetings per year respectively). 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. MOL Group also leverages external advisors and participates in industry associations to stay abreast of best practices and regulatory developments in sustainability.

The Board of Directors and its Sustainable Development Committee align their collective skills and ongoing capability-building directly with MOL Group's material impacts, risks and opportunities by ensuring that director nominations and committee composition cover core expertise areas that map to the Group's most material topics—namely climate transition, HSE and process safety, circular economy and resource efficiency, responsible business conduct and compliance, and financial risk/ERM—so that oversight of strategy, capital allocation and risk controls reflects the issues most likely to affect long-term value creation. This alignment is embedded in the Board's Charter and Corporate Governance framework (which charge the BoD with supervising long-term value, risk management and ESG standards) and in the SDC's mandate (which requires regular review of material sustainability risks and policy implementation), with any identified gaps addressed through targeted briefings by internal HSE, Strategy & Sustainability, Risk and Regulatory experts and, where needed, external advisors on emerging regulations and best practice in areas such as energy transition, circularity and human capital.

## INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY GOVERNANCE BODIES

/GOV-2/

### Information flows and frequency

The SDC and Audit Committee meet at least quarterly to review sustainability matters, with additional meetings convened as needed. The frequency and content of information flows are defined in the respective Charters and Terms of Reference. The BoD, SDC, and SB receive regular updates on material sustainability impacts, risks, and opportunities. The Group Vice President of Health, Safety and Environment and the Head of Group Investor Relations and ESG Coordination provides quarterly report to the SDC, while ad hoc updates are provided in response to emerging issues or regulatory changes. The governance bodies are informed about the implementation and effectiveness of due diligence processes, policies, actions, metrics, and targets related to sustainability. This includes updates on progress towards climate targets, safety performance, human rights due diligence, and stakeholder engagement.

### Consideration of sustainability in strategy and decision-making

The BoD and SDC consider sustainability impacts, risks, and opportunities when overseeing the Group's strategy, major transactions, and risk management processes. Trade-offs and synergies between financial, environmental, and social objectives are explicitly discussed in board deliberations. Sustainability risks are integrated into the Group's enterprise risk management framework, with regular updates provided to the BoD and SB. The Audit Committee reviews the effectiveness of risk management processes, including those related to climate, environmental, and social risks.

### Material sustainability matters addressed

During the reporting period, the BoD, SDC, and SB addressed a range of material sustainability topics, including:

- ▶ Climate strategy and decarbonization roadmap
- ▶ Progress towards sustainability targets and KPIs
- ▶ Health, safety, and environmental performance
- ▶ Ethics complaints and effectiveness of whistleblower system
- ▶ Diversity, equity, and inclusion
- ▶ Community engagement
- ▶ Supply chain sustainability
- ▶ Regulatory compliance and regulatory developments in sustainability

## INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

/GOV-3/

MOL Group's remuneration framework is designed to align the interests of its administrative, management, and supervisory bodies with the long-term strategic objectives of the company, including sustainability commitments. The Group applies a combination of fixed and variable remuneration elements, where variable components are linked to both financial and non-financial performance indicators.

The variable remuneration structure consists of short-term and long-term incentive programs. Short-term incentives (annual bonuses) reward achievement of yearly business objectives, while long-term incentives focus on multi-year performance, supporting sustainable value creation. The short term incentive scheme incorporates performance metrics beyond financial results, reflecting MOL Group's ESG priorities.

Sustainability metrics are embedded as performance benchmarks within the remuneration policy. For senior executives, ESG-related objectives form a defined component of the annual performance scorecard. Performance assessment includes specific sustainability-related targets, such as greenhouse gas (GHG) emission reduction and MOL Group's safety performance. This ensures that sustainability performance directly influences variable pay outcomes.

The Board maintains oversight of major changes to the remuneration framework. The rules governing the long term incentive scheme, including any significant modifications or updates, are approved by the Board of Directors. This governance structure ensures transparency and alignment with MOL Group's strategic objectives and stakeholder expectations.

Further information on MOL Group's Remuneration Policy and Remuneration Report can be found in Corporate Governance Declaration Section 8 Remuneration policies and practices of MOL Group's Integrated Annual Report and in the Annual General Meeting materials.

## RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

/GOV-5/

MOL Group manages risks related to its sustainability reporting within its established Enterprise Risk Management (ERM) framework, which forms an integral part of the corporate governance system. The framework ensures that all significant risks—financial, operational and strategic—are identified, assessed, treated and monitored across business units, geographic locations and time horizons. As part of this system, sustainability-related reporting risks are handled using the same methodologies and control processes that govern the wider organisational risk environment. The scope of these processes covers the full consolidation perimeter of the Group, including the phased integration of newly acquired subsidiaries and the assessment of value-chain-related information.

The Group applies ERM's unified risk assessment methodology to sustainability reporting, ensuring consistent identification and prioritisation of risks. Financial materiality assessments draw on the regular bottom-up risk identification carried out by Risk Owners and Risk Sponsors, supported by the ESG function, which provides sustainability-specific insights and evaluates the implications of the Double Materiality Assessment. Risks relevant to sustainability reporting are prioritised based on their likelihood and financial magnitude, while methodological limitations inherent to the first CSRD reporting year—such as maturing data processes and the need for estimations, especially in value-chain data—are managed through documented assumptions, internal reviews and progressive data improvement measures.

The main risks affecting sustainability reporting include the evolving requirements of CSRD and other EU-level or national regulations, the need for high-quality data from complex value chains, and the differing maturity levels of reporting processes at newly integrated subsidiaries. Additional risks may arise from methodological variations. These risks are mitigated through strengthened internal controls, ongoing harmonisation of methodologies, enhanced data governance, and external limited assurance of the sustainability information.

Findings from the risk and control assessments are systematically integrated into internal functions through the coordinated work of the ESG Coordination team, business line sustainability leads and corporate functions such as Strategy & Sustainability, Health, Safety and Environment, Human Resources, Responsible Procurement and Finance. These functions refine data processes, reporting calendars, documentation practices and due-diligence procedures in response to identified weaknesses or emerging regulatory expectations. Where specific methodological or boundary challenges occur, responsible functions develop bridging solutions and plan for alignment in subsequent reporting cycles.

Reporting to governance bodies occurs on a regular basis. The Sustainable Development Committee and the Audit Committee review sustainability and risk management topics at least quarterly, including the effectiveness of controls over sustainability reporting and progress on material sustainability-related matters. Quarterly updates are also provided by the Group Vice President of HSE and the Head of Investor Relations & ESG Coordination. The SDC reports its findings to the Board of Directors, while the Audit Committee reports to the Supervisory Board, ensuring oversight of sustainability-related risks and internal controls at the highest governance levels.

Further information is available in the Integrated Corporate Risk Management chapter of the Integrated Annual Report.

## DESCRIPTION OF MOL GROUP'S BUSINESS MODEL AND VALUE CHAINS

/SBM-1/

MOL Group is primarily an integrated oil and gas company with other complementary operations in various industries. To allow for more granulated insights, disclosures are often focused on specific business segments of MOL Group and their associated value chains. These tables summarise the business model and operations of each segment, and describe where in its own operations and its upstream and downstream value chain material impacts, risks and opportunities are concentrated.

### Exploration & Production

ESRS segment	OG – Oil and gas
Operations of the segment	MOL Group's Exploration & Production segment operates a diverse portfolio across eight countries, with an expected average daily production exceeding 90,000 barrels of oil equivalent. In Central and Eastern Europe, the focus remains on optimizing production, enhancing infrastructure, and improving hydrocarbon recovery to maintain output and support regional energy security. Internationally, MOL manages assets in countries such as Azerbaijan, Iraq, Kazakhstan, and Pakistan, applying active portfolio management to ensure profitability and resilience. Alongside traditional operations, MOL is prioritizing low-carbon technologies, including geothermal energy, lithium extraction, methane emission reduction, and carbon capture, utilization, and storage (CCUS), reinforcing its role in the energy transition while maintaining financial stability.
Upstream value chain	The primary inputs for E&P operations include oilfield services, drilling and completion equipment, production chemicals, and engineering expertise, sourced from specialized service providers and, in part, through MOL's own subsidiaries. The segment also have wide spread surface facility portfolio connecting to the production infrastructure with pipelines, gathering stations and complex engineering assets.



Downstream value chain	The outputs of the E&P segment are crude oil and natural gas, which serve as essential feedstock for MOL's integrated value chain and external markets. The majority of crude oil produced in the CEE region is supplied to MOL's own refineries, ensuring security of supply and operational integration. Internationally, crude oil is sold to regional buyers, including refineries in Pakistan and other markets. Produced natural gas is primarily sold to energy wholesalers and distribution companies, with a portion supplied to power generators and industrial consumers.
------------------------	--

#### Downstream

ESRS segment	OG – Oil and gas, MCH - Chemicals
Operations of the segment	<p>MOL Group's Downstream division consists of different business activities that are part of an integrated value chain, turning crude oil into a range of refined products, which are moved and marketed for household, industrial and transport use:</p> <p><b>Refining:</b> MOL Group's refining activities are centered around three refineries in Hungary, Slovakia and Croatia as well as various auxiliary sites and activities. Beyond these traditional activities of the segment, 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.</p> <p><b>Petrochemicals:</b> MOL Group's petrochemical operations are centered around production sites in Hungary and Slovakia. These sites operate steam crackers, polymer units, and specialty chemical plants, producing a wide range of petrochemical products such as base chemicals, polymers, polyols, specialty chemicals, and recycled compounds.</p>
Upstream value chain	<p><b>Refining:</b> The primary input is crude oil, which is sourced through MOL's own exploration and production activities, as well as through global procurement. For the procured part, the company has a diversified crude intake strategy. For the Hungarian and Slovakian refineries the primary supply is via Russian crude oil via direct pipeline, with alternative seaborne sources partially established and partially under development; and well-established seaborne supply at the Croatian refinery. Other key inputs include additives and blending components (such as biofuels), utilities, energy, technical services and equipment.</p> <p><b>Petrochemicals:</b> The primary feedstock for MOL's petrochemical operations is naphtha, which is supplied from MOL's own refineries. This backward integration ensures supply security and operational efficiency. Additional inputs include hydrogen peroxide, catalysts, recycled plastic feedstock sourced through MOL's waste management and recycling partnerships, utilities, energy, technical services and equipment.</p>
Downstream value chain	<p><b>Refining:</b> The segment's outputs are refined products, including, among others, gasoline, diesel, heating oil, aviation fuel, lubricants, bitumen, sulphur and liquefied petroleum gas (LPG). The majority of fuel products produced are distributed and sold in MOL Group's own retail network by the Consumer Services segment, with significant amounts sold to other fuel retail and wholesale companies, and to freight and passenger transport services companies. Naphtha as an intermediate product is primarily used by MOL's Petrochemicals' segment as a feedstock. Other final products, such as base oil, waxes and black products are sold to diverse set of mostly B2B customers.</p> <p><b>Petrochemicals:</b> MOL's petrochemical products serve a diverse set of B2B customers across CEE and globally. Main products are polymer compounds - primarily supplied to manufacturers of plastic packaging, consumer goods, and automotive components, base chemicals - sold to large industrial clients in the rubber, chemicals, and plastics sectors and polyols and propylene glycols used mainly to produce mattresses, car seats, insulation materials, rubber soles, and industrial resins.</p>

#### Circular Economy Services

ESRS segment	UWW – Water and waste management
Operations of the segment	MOL Group's Circular Economy Services segment was established in 2023 with the launch of Hungary's national waste management concession, operated by MOHU. This segment plays a central role in MOL's strategy to become a leading circular economy player in Central and Eastern Europe. Its activities include the management and organizing of services, including collection and treatment of municipal, industrial, and commercial waste, handover for recycling, energy recovery, and the provision of waste-based feedstock.
Upstream value chain	The key inputs for CES operations are municipal solid waste, its origins being mainly household, partially industrial waste streams, but also separately collected packaging waste from the DRS network. Additional inputs include the technology, equipment, and logistics services for collection, pre-treatment, and disposal or utilization of waste. MOHU works closely with municipalities, subcontractors, technology partners, and other MOL subsidiaries to ensure efficient and compliant waste management.

<b>Downstream value chain</b>	The outputs of CES activities are wastes prepared for utilization, such as secondary raw materials and energy carriers, which are used as feedstock for MOL's Downstream and Petrochemical segments, as well as for other companies mainly in industries active in recycling (e.g., paper, cement, or energy). By 2030, the segment aims to supply 1.5 million tonnes of waste-derived feedstock annually, supporting the transition to a low-carbon, resource-efficient circular economy.
-------------------------------	--

#### Consumer Services

<b>ESRS segment</b>	SST – Distribution and trade
<b>Operations of the segment</b>	The Consumer Services segment is a digitally-driven retailer and integrated mobility provider, operating over 2,300 service stations in the CEE region. The focus is on developing multi-purpose service stations, enhancing customer-centric operations, and becoming a regional leader in mobility solutions.
<b>Upstream value chain</b>	The primary inputs for Consumer Services include fuels and lubricants, largely supplied from MOL's own refining operations, as well as a wide range of goods and services to meet customer needs in food and convenience retail. Additional inputs include logistics services, technology solutions for digital platforms, and equipment.
<b>Downstream value chain</b>	Consumer Services is a consumer-facing business, offering fuels, lubricants, food and convenience products in its retail network and mobility services. In addition to serving individual customers, the segment also caters to B2B clients through fuel cards and fleet management services.

#### Gas Midstream

<b>ESRS segment</b>	UPE – Power generation and energy supply
<b>Operations of the segment</b>	Gas Midstream segment includes MOL Group's sole transmission system related activity in the nearly 6,000 km long high-pressure natural gas transmission pipeline system in Hungary.
<b>Upstream value chain</b>	The primary inputs for Midstream operations are natural gas volumes sourced from domestic production, underground storage, and imports via multiple entry points. Additional inputs include energy for compressor stations, technical services, and advanced monitoring and control technologies to maintain system integrity and efficiency.
<b>Downstream value chain</b>	The outputs of the Midstream segment are transmission services that deliver natural gas to distribution companies, industrial consumers, and power generators. Through its infrastructure, FGSZ enables the supply of natural gas for household heating, electricity generation, industrial processes, and as a feedstock for chemical production. By ensuring safe and efficient gas transportation, the segment supports energy security, economic stability, and the transition toward a more sustainable energy system.

#### Partnerships and minority investments

As part of its value chains, MOL Group maintains a diverse portfolio joint ventures, non-operated assets and minority investments that complement its core business and strategic objectives, acting as enablers for its integrated value chain, or to enable diversification and hedge risks.

MOL Group participates in a range of joint ventures that strengthen its integrated business model and support strategic objectives. MOL's joint ventures include partnerships focusing on hydrocarbon exploration and production in international markets partnerships, such as BaiTex, Ural Oil and Gas Group, Pearl Petroleum, and MK Oil and Gas. INA also maintains joint ventures aligned with its hydrocarbon exploration and production portfolio including ED-INA d.o.o. and Hayan Petroleum Company. Other joint ventures, such as Rossi Biofuel and Meroco, contribute to MOL's biofuel portfolio. These partnerships enable MOL to share expertise, optimize resources, and access new markets or enter new segments.

MOL's minority stakes and non-operated assets span across energy infrastructure, financial services, industrial partnerships, mobility solutions, and waste management entities that support the Circular Economy Services segment. Similarly, INA has invested in non-operated assets and minority stakes across energy infrastructure, gas distribution, renewable energy, transportation, and tourism, reinforcing its role as an integrated energy company and its commitment to diversification.

#### Revenue breakdown by ESRS sector

MOL Group derives significant revenues from activities in the fossil fuel sector and from chemicals production. The below revenue breakdown is in line with MOL Group's Consolidated Financial Statements 3. Total operating income. Sustainability-related goals and their relationship with significant product groups, solutions and project implemented or to be implemented are described in chapter E1 – Transition plan of this sustainability statement.

Revenue by significant product line	UNIT OF MEASURE	2025	2024	ESRS
<b>Crude oil and oil products</b>	HUF million	5,904,158	6,389,174	ESRS 2 – SBM 2
<b>Natural gas and gas products</b>	HUF million	417,547	487,670	ESRS 2 – SBM 2
<b>Petrochemical products</b>	HUF million	828,475	896,387	ESRS 2 – SBM 2



When determining revenue breakdown by ESRS sectors, the information in MOL Group's Consolidated Financial Statements 2. Segmental information and 3. Total operating income have been taken into account.

ESRS sector	UNIT OF MEASURE	2025	2024	ESRS
Oil and Gas	HUF million	3,799,053	3,928,851	ESRS 2 – SBM 2
Chemicals	HUF million	828,475	896,387	ESRS 2 – SBM 2
Distribution and trade	HUF million	3,415,096	3,720,173	ESRS 2 – SBM 2
Power generation and energy supply	HUF million	108,023	119,369	ESRS 2 – SBM 2
Water and waste management	HUF million	440,037	426,309	ESRS 2 – SBM 2

In addition to the ESRS sectors reflected in the revenue breakdown, MOL Group has identified several additional ESRS sectors that are relevant due to significant internal activities, intercompany transactions, and their connection to material impacts, risks and opportunities considered in the Double Materiality Assessment. First, MOL's substantial intercompany flows arising from refinery-to-retail fuel transfers, petrochemical feedstock movements, and circular economy feedstock supply fall within the ESRS sector Distribution and Trade (SST) and therefore constitute a significant internal activity beyond the externally reported Oil & Gas and Chemicals sectors. Second, MOL's growing mobility and e-charging services fall within Road Transportation (TRO) due to their role in supporting downstream energy consumption and customer mobility patterns identified as material in the value chain. The role of this revenue generating activity is immaterial compared to the previously listed ESRS sectors. Consistent with the methodology applied in the Double Materiality Assessment, these additional sectors have been included because they reflect activities that, while not always externally revenue-generating, represent operationally significant components of MOL Group's integrated value chain and are linked to material impacts, risks and opportunities across climate transition, circular economy, and energy-system resilience.

## STAKEHOLDER ENGAGEMENT

/SBM-2, SBM-3/

MOL Group regularly engages with its most important stakeholders affected or affecting its business, including but not limited to shareholders, employees, customers, suppliers, professional associations, local communities and authorities through various channels. Further information is available in the [Stakeholder Engagement section](#) of our website. 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.

During the autumn of 2025 the ESG Coordination department engaged with selected stakeholders with the specific aim to gather information to support our double materiality assessment. Internal stakeholders were selected to cover both MOL Group's operational structure (Exploration & Production; Refining; Petrochemicals; Consumer Services; Circular Economy Services and Midstream and Group-level Corporate Functions) as well as sustainability matters by contacting relevant internal subject matter experts. This exercise laid the foundations for assessing and evaluating MOL Group's sustainability-related impacts, risks and opportunities.

External stakeholders including investors & financial analysts, creditors and banks, employee representation, affected communities and non-governmental organisations have been contacted to collect insights and validate internal findings regarding the double materiality assessment results via a survey. Gathered interests and views of these stakeholders have been incorporated by expanding the list of material IROs to match stakeholder expectations.

Further information on the double materiality assessment process can be found in the following section.

MOL Group continues to refine its strategy and business model in response to evolving stakeholder expectations, regulatory developments and the outcomes of its Double Materiality Assessment. Building on the strategic directions outlined in the *Shape Tomorrow Strategy* and several other chapters of the Integrated Annual Report (Management Discussion & Analysis and the Environment 1 chapter of this sustainability statement) —such as accelerating circular economy solutions, advancing low-carbon technologies, strengthening energy security, and enhancing transparency—MOL Group has further integrated stakeholder feedback into its transformation agenda. Key adjustments include increased focus on renewable and low-carbon energy solutions (including green hydrogen and geothermal), the expansion of circular economy services through MOHU, and the progressive integration of newly acquired subsidiaries into Group-wide HSE and sustainability reporting systems. These changes reflect stakeholder priorities around climate action, responsible resource use, community impacts, and long-term resilience, and are designed to strengthen trust and alignment with customers, regulators, employees, and local communities.

Looking ahead, MOL Group plans additional steps to embed sustainability considerations more deeply into its business model over the 2025–2030 horizon. These include scaling waste-derived feedstock supply, further diversifying crude and energy inputs, enhancing value-chain due diligence, and improving the quality and coverage of sustainability data as CSRD-aligned processes mature. As these initiatives progress, MOL Group expects a gradual but meaningful evolution in its stakeholder relationships: increased transparency and improved data quality will support more informed dialogue with investors and regulators, while the expansion of circular and low-carbon business lines is anticipated to strengthen community and customer perceptions of MOL Group as a forward-looking, transition-ready energy company. Collectively, these steps reinforce the Group's long-term strategic shift toward a more sustainable, diversified, and stakeholder-responsive business model.

## DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES

/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 2025, MOL Group conducted its second Double Materiality Assessment (hereinafter: DMA) considering both impact and financial materiality in compliance with CSRD requirements. The exercise consisted of the following key steps:

1. Setting up a long-list of sustainability-related impacts, risks and opportunities (hereinafter: IROs) relevant for MOL Group's operations and its upstream and downstream value chains.
2. Evaluation of the IROs
3. Validation of the findings by relevant stakeholders
4. Selecting material disclosure requirements to be covered by the sustainability report

### Impact materiality

When assessing impact materiality, both impacts with which MOL Group is involved through its own operations, and as a result of its business relationships has been taken into consideration.

#### *Own operations:*

The starting point for the identification and evaluation of impacts of own operations relies on MOL Group's well-established governance processes described in the *Policies* sections of each topical standard. With the specific aim to aggregate this information for the purpose of the double materiality assessment, MOL Group's ESG function first collects relevant information from all relevant internal subject matter experts & leaders related to sustainability matters. This allows for a topical focused, cross-segment view. Secondly, the assessment takes the specific activities of each key business segments introduced in section SBM-1 Description of MOL Group's business model and value chain into consideration by gathering inputs from their segmental management. This approach allows for a granulated, segment-by-segment view on impacts with which MOL Group is involved through its own operations.

Using these inputs, completed by recommendations from external guidance and peer analysis, the ESG function proposes a long-list of impacts, which are then scored using a unified methodology based on severity (i.e., the scale, scope and irremediable character of negative impacts and the scale and scope of positive impacts), likelihood and time-horizons by the aforementioned internal stakeholders. Finally, views and interests of external stakeholders are considered by channelling in inputs gathered via survey as described in section SBM-2 Stakeholder engagement.

#### *Business relationships:*

In case of value chain impacts, specific activities have been taken into consideration by grouping the most relevant value chain actors based on their role in MOL Group's value chains and shared ESG characteristics. This approach was necessary given MOL Group's diverse set of inputs and its provision of a wide range of products and services.

For the upstream value chain, we considered the type of procured goods (hydrocarbon and non-hydrocarbon suppliers) and industry classifications (Primary & Industrial Production; Trade & Consumer Services; Utilities & Infrastructure; Business & Social Services). For the downstream value chain, actors were grouped according to the key product categories they procure from MOL Group (Fuels, Polymers, Base Chemicals, Natural Gas). The prioritisation of companies was based on both the importance of the business relationship and the potential of ESG impacts associated with their operations.

The assessment of impacts for both upstream (suppliers) and downstream (buyers) actors relied on external sources, including publicly available information from key suppliers and buyers, and external databases and ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

## Financial materiality

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 steps laid down in the *Group Risk Management Policy*. This process takes a bottom-up approach, where Risk Owners and Risk Sponsors identify and assess all relevant risks related to the business or functional units in their domain – covering both risks stemming from internal factors (own operations) and the external environment, including the upstream and downstream value chain. To facilitate the identification of risks that may arise from impacts and dependencies, the ESG function is also involved in the process and channels in the latest conclusions related to the identified ESG impacts.

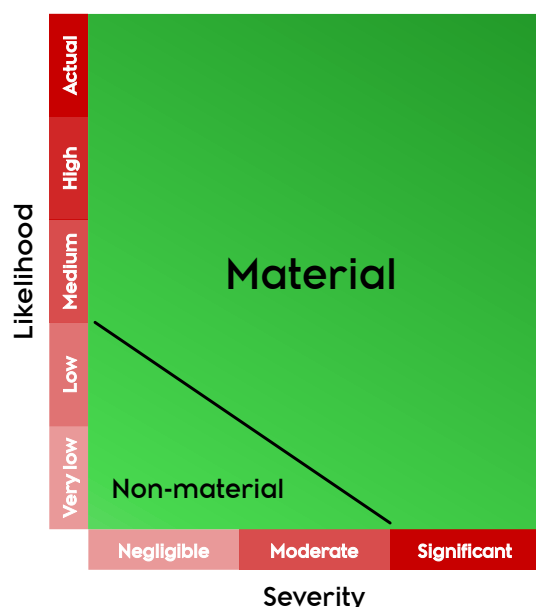
The starting point for the identification of sustainability-related opportunities for the purpose of the DMA is MOL Group's *Shape Tomorrow Strategy* revised in 2024, the Transition plan and additional insights of management of key business segments.

Using these inputs, the ESG function proposes a long-list of sustainability-related risks and opportunities, which are then scored using a unified methodology based on their likelihood and financial magnitude by relevant internal subject matter experts and leaders related to each sustainability matter. Finally, views and interests of external stakeholders are considered by channelling in the inputs gathered via survey as described in section SBM-2 Stakeholder engagement.

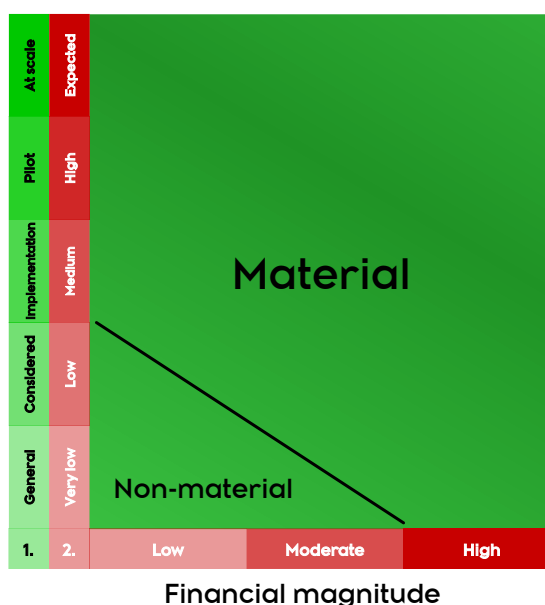
## Evaluation of results

After the scoring of impacts, risks and opportunities on the long-lists, the list of material IRO are selected using the below thresholds:

Threshold for Impact materiality:



Threshold for Financial materiality



42 impacts, 22 risks and 14 opportunities reached these thresholds for materiality for at least one segment of MOL Group. Material IROs are mapped against the disclosure requirements of ESRS. Disclosure requirements with at least one corresponding impact, risk or opportunity are deemed to be material. The remainder are deemed to be non-material. If a material IRO is not applicable to an ESRS disclosure requirement, they are covered in entity-specific disclosures.

The results of the double materiality assessment have been validated by the Board of Directors, while our methodology has been approved by an external auditor fulfilling the mandatory requirements described by CSRD & national legislations on sustainability reporting.

## Changes compared to the prior reporting period

Compared to the double materiality assessment in FY2024, some changes have been implemented to improve MOL Group's IRO assessment process:

- ▶ Business segment level scoring of IROs related to MOL Group's own operations have been introduced to enable more detailed screening. Beside subject matter experts, the new process included business unit leaders as well. Details are available in this chapter's Impact materiality section.

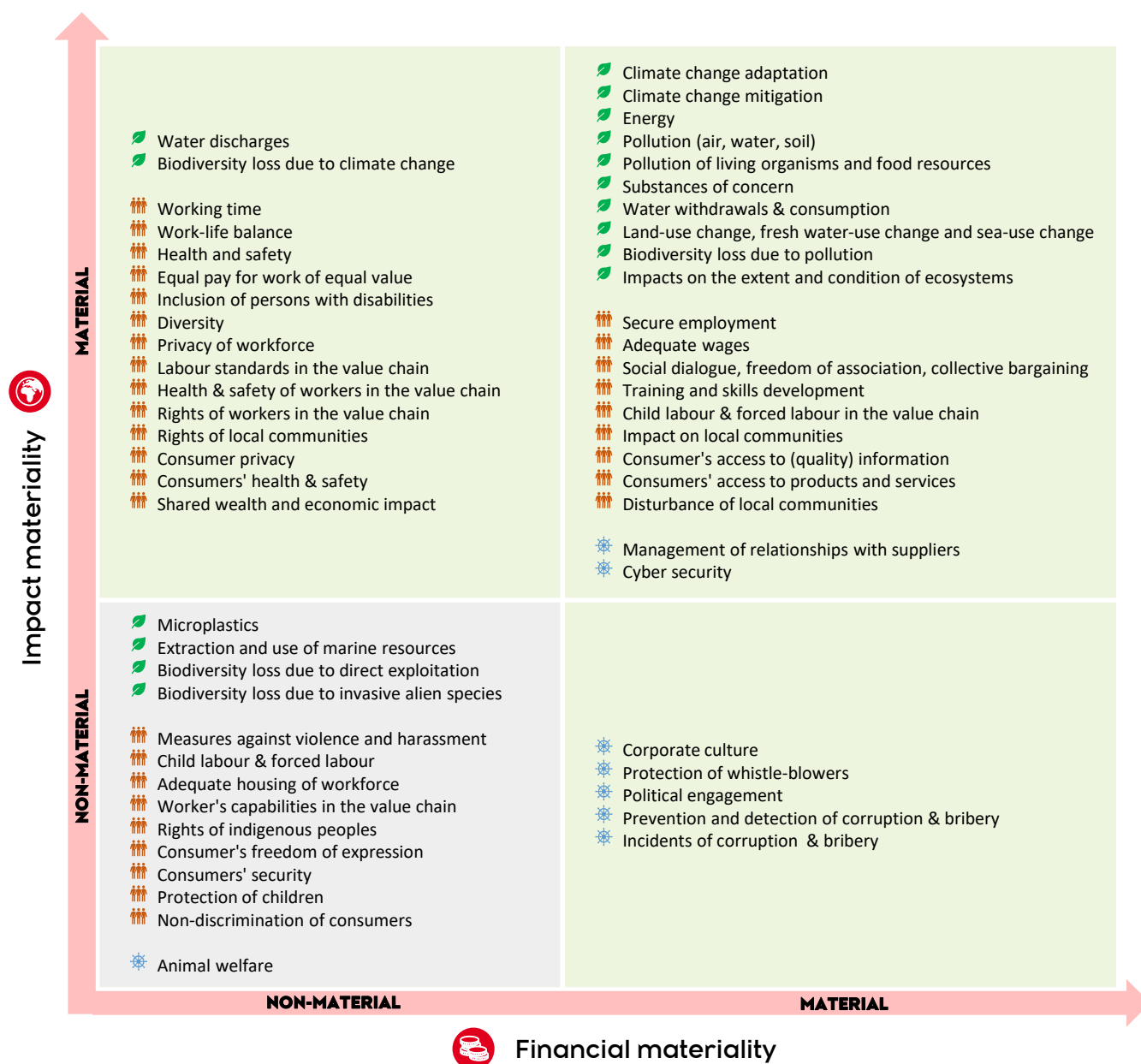
- ▶ Impact assessment within MOL Group's upstream and downstream value chain has been developed based on external databases. Results of this assessment can be found all throughout this report. Details are available in this chapter's Impact materiality section.

## SUMMARY OF MOL GROUP'S DOUBLE MATERIALITY ASSESSMENT

/IRO-2/

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:

- ▶ **Impact materiality** (vertical axis): 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** (horizontal axis): 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.



## Selecting material Disclosure Requirements

To select the material Disclosure Requirements (DRs) based on the results of the DMA, the list of DRs have been matched with the list of material IROs. If at least one material was matching with a DR it is considered material. During the preparation of the report the nuanced information related to IROs have also been considered, e.g., which part of the value chain shall be discussed in relation to the given IRO.

## List of material IROs and location of related disclosures

Impacts:

Impact type	IRO title	Relevancy in the value chains	Relevant chapter
Actual positive impact	Contribution to the transition to low carbon economy	Own operations	E1
Actual positive impact	Transition to renewable energy in the upstream and downstream value chain	Upstream and downstream value chain	E1
Actual negative impact	Effect on climate	Own operations	E1
Actual negative impact	Scope 3 GHG emission of products in the upstream and downstream value chain	Upstream and downstream value chain	E1
Actual negative impact	Effect on air quality	Own operations	E2

Impact type	IRO title	Relevancy in the value chains	Relevant chapter
Actual positive impact	Contribution to reducing air pollution	Own operations	E2
Potential negative impact	Soil and groundwater pollution	Own operations	E2
Potential negative impact	Marine pollution	Own operations	E2
Potential negative impact	Water pollution	Own operations	E2
Potential negative impact	Impact of hazardous chemical use in the upstream and downstream value chain	Upstream and downstream value chain	E2
Potential negative impact	Pollution and toxic waste in the upstream and downstream value chain	Upstream and downstream value chain	E2
Potential negative impact	Water withdrawal & consumption	Own operations	E3
Potential negative impact	Water use in the downstream value chain	Downstream value chain	E3
Potential negative impact	Impact on biodiversity due to land use change	Own operations	E4
Potential negative impact	Impact on biodiversity due to pollution	Own operations	E4
Actual positive impact	Recycling & circular economy practices	Own operations	E5
Actual negative impact	Waste generation	Own operations	E5
Actual negative impact	Impact of waste and packaging in the downstream value chain	Downstream value chain	E5
Actual negative impact	Depletion of resources	Own operations	E5
Potential negative impact	Environmental impacts of raw material use in the downstream value chain	Downstream value chain	E5
Actual positive impact	Inclusive work environment	Own operations	S1&2
Potential negative impact	Potential negative impact of poor labour standards in the upstream value chain	Upstream value chain	S1&2
Actual positive impact	International mobility	Own operations	S1&2
Actual positive impact	Secure employment and social dialogue	Own operations	S1&2
Potential negative impact	Potential negative impact on workers' rights in the upstream and downstream value chain	Upstream and downstream value chain	S1&2
Potential negative impact	Hazardous working conditions	Own operations	S1&2
Potential negative impact	Potential negative impact on workers' health and safety in the upstream value chain	Upstream value chain	S1&2
Actual positive impact	Training and skills development	Own operations	S1&2
Actual positive impact	Collaboration with academic institutions	Own operations	S1&2
Potential negative impact	Operations in areas with low security	Own operations	S1&2
Actual positive impact	Opportunities for local communities	Own operations	S3
Actual positive impact	Supporting local communities	Own operations	S3
Actual negative impact	Disturbance from operations	Own operations	S3
Potential negative impact	Industrial accidents	Own operations	S3
Actual positive impact	Contribution to shared wealth	Own operations	S3
Potential negative impact	Potential negative impact on local communities and human rights in the upstream and downstream value chain	Upstream and downstream value chain	S3
Actual positive impact	Supply of critical products (fuel, electricity, convenience products)	Own operations	S4
Actual positive impact	Providing sustainable mobility services	Own operations	S4
Potential negative impact	Product safety and quality issues in the downstream value chain	Downstream value chain	S4

Impact type	IRO title	Relevancy in the value chains	Relevant chapter
Actual positive impact	Supply chain engagement & Responsible sourcing	Own operations	G1
Potential negative impact	Dependency of suppliers	Own operations	G1
Potential negative impact	Potential data exposure	Own operations	G1

Risks:

IRO title	Relevancy in the value chains	Relevant chapter
Physical risk from climate-induced extreme weather events	Own operations	E1
Capital access risk due to delayed climate neutrality efforts	Own operations	E1
Transition risk: Cost of GHG emissions and compliance	Own operations	E1
Regulatory risks from energy efficiency and renewables	Own operations	E1
Market risk due to climate-related shifts in demand	Downstream value chain	E1
Rising environmental compliance and mitigation costs - air pollution	Own operations	E2
Rising environmental compliance and mitigation costs - water & soil pollution	Own operations	E2
Risk due to water availability	Own operations	E3
Reputational damage or litigations due to ecosystem degradation	Own operations	E4
Depletion of natural resources	Own operations	E5
Waste handling and recycling capacity bottlenecks	Own operations Downstream value chain	E5
Regulatory risk from circular economy legislation	Own operations	E5
Ineffective social dialogue	Own operations	S1&2
Attraction and retention of talent	Own operations	S1&2
Lack of workforce skills (inadequate reskilling, retiring & knowledge transfer, new technologies)	Own operations	S1&2
Rising employment costs	Own operations	S1&2
Social license to operate: Complaints or local community opposition	Own operations	S3
Cybersecurity incidents	Own operations	G1
Supply chain disruption: unavailability of critical raw materials	Upstream value chain	G1
Supply chain disruption: non-compliance of suppliers with ESG requirements	Upstream value chain	G1
Fraud or misconduct leading to financial or reputational harm	Own operations	G1
Compliance with antitrust, consumer protection, merger control regulations or international sanctions	Own operations	G1

Opportunities:

IRO title	Relevancy in the value chains	Relevant chapter
Access to Green Finance	Own operations	E1
Green hydrogen production	Own operations	E1
Renewable energy production & storage	Own operations	E1
Leveraging subsurface expertise (geothermal, lithium & Carbon Capture & Storage)	Own operations	E1
Electrification & energy efficiency projects	Own operations	E1
Waste-based fuel usage & production	Own operations	E5
Sustainable aviation fuel	Own operations	E5
Biogas production	Own operations	E5
Sustainable chemicals	Own operations	E5
Waste management services	Own operations	E5
E-charging network	Own operations	S4
Strengthening Customer Loyalty Through Access to Sustainable Products and Services	Own operations Downstream value chain	S4



IRO title	Relevancy in the value chains	Relevant chapter
Building Customer Trust Through Transparent Communication of Sustainability Practices	Own operations Downstream value chain	S4
Transparent collaboration with industry associations, public institutions & authorities	Own operations	G1

Details of each IRO – such as description, time horizons and further information on the relevancy in MOL Group’s value chain and connected sustainability topics are described in the beginning of the corresponding topical standard.

#### 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 statement	
ESRS 2 BP-2	Disclosures in relation to specific circumstances	
ESRS 2 GOV-1	The role of the administrative, management, and supervisory bodies	Role, composition and expertise of administrative, management, and supervisory bodies
ESRS 2 GOV-2	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	Information provided to and sustainability matters addressed by governance bodies
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	
ESRS 2 GOV-4	Statement on sustainability due diligence	Supply Chain Management
ESRS 2 GOV-5	Risk management and internal controls over sustainability reporting	
ESRS 2 SBM-1	Strategy, business model, and value chain	Description of MOL Group’s business model and value chains
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 Materiality 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	Actions 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 material)
E1-8	Internal carbon pricing	
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 and 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	Impacts and risks related to water use
E3-1	Policies related to water and marine resources	
E3-2	Actions and resources related to water and marine resources	
E3-3	Targets related to water and marine resources	
E3-4	Water consumption	
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	Impacts and risks related to biodiversity and ecosystems
E4, IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Impacts and risks related to biodiversity and ecosystems



DR		Reference to chapter
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	Material impacts, risks, and opportunities related to resource use and circular economy
E5-1	Policies related to resource use and circular economy	Policies related to waste generation and treatment Policies related to resource use in the Downstream segment 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 Circular Economy Services
E5-4	Resource inflows	Metrics related to waste generation and treatment Metrics related to resource in- and outflows of Circular Economy Services
E5-5	Resource outflows	Metrics related to waste generation and treatment Metrics related to resource in- and outflows of Circular Economy Services
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	Material impacts, risks, and opportunities related to own workforce and workers in the value chains
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 and 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 and 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	No disclosure (phase in)
S1-11	Social protection	
S1-12	Persons with disabilities	
S1-13	Training and skills development metrics	Metrics related to trainings and skill development 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	Metrics 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	

DR		Reference to chapter
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)
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 communities
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 and 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 and economic impact
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to affected communities
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	Actions related to consumers and end users
S4-2	Processes for engaging with consumers and end-users about impacts	
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	Role, composition, and expertise of administrative, management, and supervisory bodies
G1, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Impacts, risks, and opportunities related to business conduct
G1-1	Corporate culture and Business conduct policies and corporate culture	Policies related to ethical business conduct
G1-2	Management of relationships with suppliers	Policies related to supply chain management Actions related to supply chain management
G1-3	Prevention and detection of corruption and bribery	Policies related to ethical business conduct
G1-4	Confirmed incidents of corruption or bribery	Actions related to preventing corruption and bribery
G1-5	Political influence and lobbying activities	Policies related to advocacy Actions related to advocacy
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	Role, composition, and expertise of administrative, management, and supervisory bodies
ESRS 2 GOV-1	21 (e)	Percentage of Board members who are independent	BRR	Role, composition, and expertise of administrative, management, and supervisory bodies
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	Description of MOL Group's business model and value chains
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	BRR	Description of MOL Group's business model and value chains
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	No disclosure (not material)
ESRS E1-7	56	GHG removals and carbon credits	EUCL	No disclosure (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 and risks related to biodiversity and ecosystems
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)
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	Material impacts, risks, and opportunities related to own workforce and workers in the value chains

DR	Data point		Legislation	Chapter
ESRS 2 – SBM 3 – S1	14 (g)	Risk of incidents of child labour	SFDR	Material impacts, risks, and opportunities related to own workforce and workers in the value chains
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, engagement, and grievances related to diversity and inclusion
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	SFDR	Policies related to grievances and remediation
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	Metrics 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 value 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 local communities
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles and OECD guidelines	SFDR, BRR	Policies related to affected local communities
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	Policies related to consumers and end-users
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 ethical business conduct
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	SFDR, BRR	Actions related to prevention of corruption and bribery
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	SFDR	Policies related to ethical business conduct

(SFDR = Sustainable Finance Disclosure Regulation, P3 = EBA Pillar 3 disclosure requirements, BRR = Climate Benchmark Standards Regulation, EUCL = EU Climate Law)

## CLIMATE CHANGE AND ENERGY

/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. 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 the main engine to fund the transition and is foreseen to be maintained over the strategic horizon to 2030.

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. 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 targets disclosed in MOL Group's transition plan are aligned and based on internal and external policy objectives, including MOL Group's *HSE and Social Impact Policy's* commitment to reduce the Group's environmental footprint, protect natural values and support international efforts that address climate-related risks. The plan includes key milestones for 2030 and 2050 with the following targets:

- ▶ Decrease absolute gross Scope 1 and 26 GHG emission by 25% by 2030 compared to 2019<sup>7</sup>,
- ▶ Decrease absolute gross Scope 3 GHG use-phase emissions of our sold energy products<sup>8</sup> (Category 11: Use of sold products) by 5% by 2030 compared to 2022,
- ▶ Reach net zero GHG emissions on all Scopes by 2050,
- ▶ Increase renewable energy consumption to 2,500 GWh by 2030,
- ▶ 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 targets also take into account the viewpoint of MOL Group's key stakeholders such as investors, financial institutions, business relationships and customers through internal representatives of the mentioned stakeholders.

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 2019-2025 period, nor in the measurement methodologies and significant assumptions behind the GHG calculation, the baseline value is considered representative and consistent

<sup>6</sup> Scope 2 location based emissions

<sup>7</sup> GHGs covered in target: carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>)

<sup>8</sup> Target refers to Scope 3 Category 11: Use of sold products, which includes sales of natural gas and fossil-based refinery products.

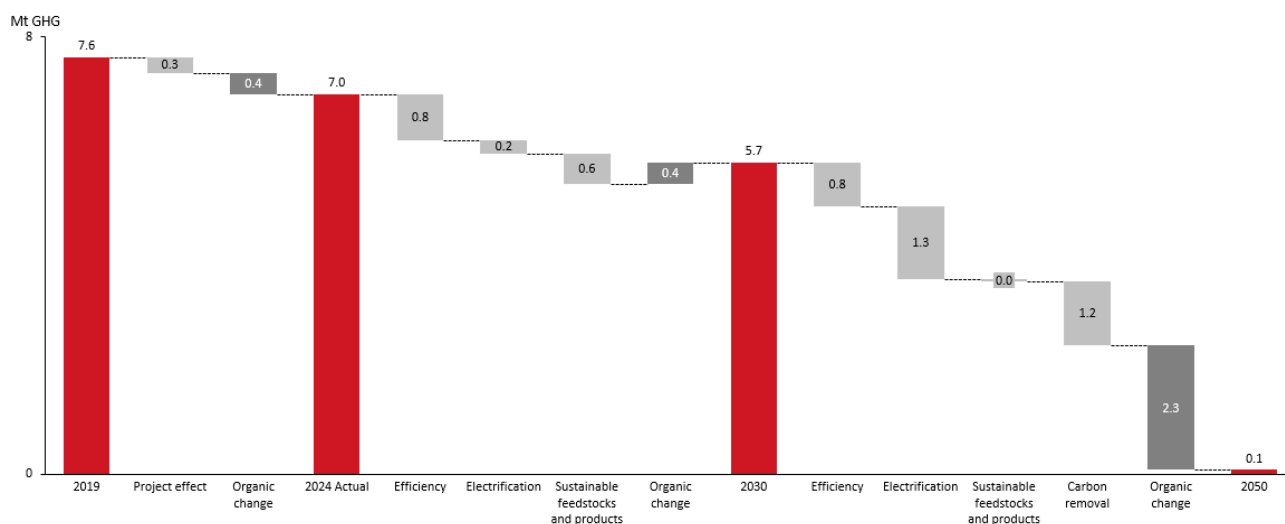
with the reported GHG inventory boundaries<sup>9</sup> of MOL Group's current operations. The baseline value was 6.93 mn tons of CO<sub>2</sub>-eq for Scope 1 emissions and 0.7 mn tons of CO<sub>2</sub>-eq for Scope 2 location-based emissions. The scope of the target covers MOL Group's Exploration and Production, Downstream, Consumer Services, and Industrial and Corporate Services business segments, regardless of the country where these segments are present. 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. Emissions related to Circular Economy Services are included in the sustainability statement and its metrics for the first time in this sustainability statement. Currently, this business segment is excluded from the target boundary until the segment's operations are fully integrated into MOL Group's consolidated target-setting process. Metrics are disaggregated in 'Metrics related to GHG emissions' section for traceability of target scope.

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<sup>10</sup>. 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 scope of the target thus covers all relevant sales activities throughout the Group's operations. The baseline value for Scope 3 GHG use-phase emissions of sold energy products is 56.7 mn tons of CO<sub>2</sub>-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 in 2024. The levers are listed below and also visualized on the below figure.

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. The quantified contributions from the energy-efficiency lever reflect the expected effect of projects under approval, execution or commissioning. While several improvements were already implemented, the full benefit of multi-year efficiency packages (e.g. turbine electrification, flue-gas optimization, steam-system redesign) will materialize only once these projects achieve full operational stability.

**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

<sup>9</sup> As stated in section Basis for Preparation, newly acquired companies are not yet part of the GHG inventory.

<sup>10</sup> 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.



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.

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.

Most of the 2019–2030 Scope 1 and 2 reduction is expected from projects that enter full operation after 2026. As a result, interim years (2024–2026) may not show linear emission decreases and may include temporary increases driven by operational intensity. This profile is characteristic of heavy industrial transition pathways.

#### 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. For this reason, MOL Group's transition plan is currently not based on science-based climate scenarios, but internally developed macroeconomic scenarios. 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.

During the formulation of the *Shape Tomorrow Strategy*, MOL Group's forecasts were 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. During 2025, a new set of macroeconomic scenarios have been developed, which take into account geopolitical and geoeconomic developments as well as the direction and pace of the energy transition. The new set of scenarios have been approved by the Board of Directors. The robustness of *Shape Tomorrow Strategy* was assessed against these scenarios. The assessment concluded that the strategic directions laid out in the strategy are still relevant and feasible.

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<sup>11</sup>. Based on the Group's activities, MOL Group is excluded from the EU Paris-aligned Benchmarks.<sup>12</sup>

MOL Group's resilience analysis indicates that the Group has the capacity to adjust and adapt its strategy and business model to climate change across the short, medium and long term. Strategically, the Shape Tomorrow direction and the approved transition plan allow for pacing and resequencing of decarbonization investments without changing strategic intent, supported by internally developed macroeconomic/transition scenarios and external inputs (including IEA WEO premises). This flexibility helps preserve ongoing access to finance at an affordable cost of capital by demonstrating a credible pipeline of low-carbon projects and disciplined capital allocation, underpinned by internal carbon pricing and integration into business planning.

MOL Group considers workforce reskilling and capability building as enabling factors. Energy-management systems, *HSE MS* elements and Area Books embed climate-related competencies, and planned projects (e.g., green hydrogen, biomethane, waste management, renewables) require targeted upskilling that is sequenced with the investment pipeline. Together, these measures support the Group's ability to adapt and to mitigate potential adverse effects on competitiveness and financing conditions across time horizons.

More information about the resilience of the strategy are available in the Integrated Risk Management chapter of the Management Report and under the section 'Impacts, Risks, and Opportunities related to Climate Change' 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 2025, MOL Group produced 94,742 barrels of oil equivalent per day. At the end of 2023, MOL Group was estimated to have 81 MMboe of natural gas and 234 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) 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 as polypropylene, low-density and high-density polyethylene. In 2025, MOL Group sold 19.6 million tons of refined products and 1.2 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 MOL Group's 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/

Since 2020, several projects have been implemented with cca. 0.4 mn tons of CO<sub>2</sub> reduction impact compared to the 2019 base year. From 2024 to 2025, MOL Group's Scope 1 and 2 emissions increased by 4.6% for the target boundary (under *HSE MS*) due to higher utilization rates of refineries, and by 10.1% for the consolidated accounting group due the inclusion of new assets, most importantly the waste incinerator of MOHU Budapest, which is integrated into MOL Group's Scope 1 and 2 reporting from this year.

EU Taxonomy eligible activities in turnover is 10.8%, in OpEx 36.1%, in CapEx 17.8% for the year 2025. EU Taxonomy aligned activities in turnover is 1.8%, in OpEx 14.3%, in CapEx 12.9% for the year 2025. 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

<sup>11</sup> SBTi: Pathways to Net Zero

<sup>12</sup> Article 12(1) of Commission Delegated Regulation (EU) 2020/1818



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.

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 for special dividends and acquisitions as well.

In December 2025, MOL Group published its first Green Finance Framework, establishing a clear structure for issuing green bonds and other green financing instruments to accelerate the Group's low carbon transition. The Framework defines eligible green project categories—renewable energy, energy efficiency, circular economy solutions, pollution prevention and control, and clean transportation—and sets out processes for project evaluation and selection, management of proceeds, and impact reporting, including external post issuance verification. In connection with the Framework, Sustainable Fitch provided a Second Party Opinion awarding the best available “Excellent” rating, and concluded that the Framework aligns with the ICMA Green Bond Principles and that the eligibility criteria are aligned with the EU Taxonomy Regulation. Together, the Framework and the SPO enhance transparency for investors and strengthen MOL Group's capacity to mobilize capital for its decarbonization pathway under the *Shape Tomorrow Strategy*. The documents are publicly available on MOL Group's website.

In 2025, MOL Group has spent 430 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.

#### **Decarbonisation and energy efficiency improvement actions in the Downstream segment**

Until 2050, major efficiency projects will continue to be the main decarbonization lever for MOL Group. Electrification projects will continue its later phases well into 2040s at all large Downstream sites. In the 2025-2030 period, MOL Group has several actions planned to enhance efficiency and reduce emissions, requiring around USD 800 million in CAPEX from the total planned USD 4.3 billion for low-carbon projects:

##### **Danube Refinery:**

- ▶ The Danube Refinery's facilities went through smaller upgrades to improve energy efficiency, including one of the hydrogen units was retrofitted, resulting in 1,81 kilotonnes CO<sub>2</sub> emissions savings. Furthermore, geothermal energy exploration activities have been initiated in and around the refinery to assess the potential for geothermal energy utilization. In case thermal water with the right temperature can be identified at the appropriate location and depth, it could significantly support the refinery's energy needs.

##### **Rijeka Refinery:**

- ▶ In 2025, a major energy-efficiency project was completed, enabling a substantial reduction in energy consumption when processing hydrocracker heavy naphtha by installing an additional pipeline with several valves and regulation instruments. With this implementation, double hydrotreating has been eliminated, resulting not only in significant energy saving but also in a notable decrease in CO<sub>2</sub> emissions.
- ▶ Planned projects for 2026 include several initiatives aimed at supporting decarbonisation at the Rijeka Refinery:
  - ▶ A further major project currently under implementation is the upgrade of flue-gas handling at the Fluid Catalytic Cracking Unit. This upgrade will ensure optimal processing of flue gases in full compliance with environmental protection requirements while simultaneously improving energy efficiency and contributing to emission reductions.
  - ▶ Another initiative focuses on improving the energy performance of the refinery's power plant through the installation of back-pressure steam turbines equipped with power generators. This development eliminates the need for steam-reduction stations and low-efficiency condensing stages, thereby increasing overall energy efficiency and reducing carbon dioxide emissions.
  - ▶ In addition, the Reformate Fractionation Unit – Isomerisation Unit integration project seeks to eliminate the need for double hydrotreating of light reformate at the Isomerisation Unit. By constructing an additional pipeline connecting the Reformate Fractionation Unit directly with the Isomerisation Unit, the project will reduce overall energy consumption and cooling-water demand, supporting further reductions in carbon dioxide emissions.
  - ▶ The Green Hydrogen initiative involves the installation of an electrolyser at the refinery, supported by a solar power plant; as well as the development of dedicated hydrogen storage and loading facilities (further information available below in this chapter).

#### Slovnaft:

- ▶ In the Slovnaft Refinery and Petrochemical units, focus in 2025 was on the development of various efficiency enhancements projects, including an initiative to replace liquid fuel with gaseous fuel at the Slovnaft powerplant. This change is expected to reduce CO<sub>2</sub> emissions by approximately 230 kilotonnes per year and increase the yield of white products, making it one of the largest CO<sub>2</sub> reduction initiatives in the Downstream segment.
- ▶ In terms of electrification and renewable energy, condensing steam drives are planned to be replaced with electromotors at the Slovnaft refinery. This change aims to reduce heavy fuel oil usage for steam production, leading to a decrease in CO<sub>2</sub> and other pollutant emissions by 100-150 kilotons per year.

#### MOL Petrochemicals:

- ▶ In 2025, beyond several minor improvements aimed at reducing heat and material losses during processing and maintenance activities, MOL Petrochemicals focused on developing and planning energy-efficiency and electrification projects. These initiatives include replacing low-efficiency steam turbines with electric drives and installing new steam-pipeline connections to support improved energy distribution. Among these efforts, two major electrification projects are currently under development.
- ▶ The first major project is an energy-efficiency upgrade in one of the core steam-driven process units, where the existing low-efficiency condensation steam turbine will be replaced with a high-efficiency electric motor. This intervention is expected to reduce annual energy consumption by 571,914 gigajoules and decrease carbon dioxide emissions by 29.82 kilotonnes per year.
- ▶ The second project focuses on further electrification and steam-system optimisation within another key process unit. It includes replacing steam-turbine-driven compressors with electric motors and installing a high-pressure/low-pressure back-pressure steam-turbine generator to optimise the internal steam balance of the unit. This project is projected to reduce annual energy consumption by 1,143,296 gigajoules and lower carbon dioxide emissions by over 60 kilotonnes per year. In addition, the installation of new steam-pipeline infrastructure will allow surplus steam to be transferred to the Polyol plant, further enhancing site-wide efficiency.

MOL Group's 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:
  - ▶ MOL Group's first 10 MW green hydrogen plant at the Danube Refinery underwent an extensive commissioning period, including all required performance tests and entered operation in 2025. Throughout its initial operating period, the plant has provided valuable hands-on experience and technical insights that are now being incorporated into MOL Group's ongoing hydrogen initiatives.
  - ▶ Further green hydrogen developments are progressing in Rijeka and in Bratislava. In Croatia, construction has begun on a 10 MW electrolyser at the Rijeka Refinery, accompanied by an 11 MW solar power plant and a hydrogen logistics centre. This integrated investment will strengthen the site's renewable based hydrogen production capabilities and broaden MOL Group's expertise in green hydrogen technologies.
  - ▶ At the Slovnaft Refinery in Bratislava, preparations continued for a planned installation of a 20 MW electrolyser unit. The final investment decision depends on securing EU financial support, for which an application has already been submitted.
- ▶ MOL Group has produced a diesel fuel containing Hydrotreated Vegetable Oil (HVO), and Sustainable Aviation Fuel (SAF) at the refinery of Slovnaft in Bratislava. The successful production test confirms that MOL Group is technologically ready for the production of alternative synthetic fuels, which is part of the company's long-term *Shape Tomorrow Strategy*. MOL Group has been using the so-called co-processing at the Danube Refinery in Százhalombatta for years: the process reduces the emissions of traditional fuels by mixing plant residues, as the bio and fossil components are processed simultaneously directly during production. The production test was successful.

#### Actions in the Circular Economy Services segment

- ▶ 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. Ever since the government published the relevant legislative acts and guiding methodologies, the cooperation with relevant authorities and government bodies has been continuous.

- ▶ Increasing the ratio, and with it, the volume of selectively collected, clean streams of wastes is crucial to realizing the long-term targets of the segment. It enables materials to be more effectively be directed towards more desirable levels in the waste hierarchy (e.g., from disposal to recycling), thus allowing for the realization of all the potential positive outcomes identified in the impacts and opportunities of the segment.
- ▶ The intensive investment program of MOHU continued in 2025, and was targeted towards the intensification of selective waste collection, and improving the infrastructure to mitigate potential asset-related risks. Projects included the continued development of household, and textile waste collection infrastructure, commissioning of the second own waste yard, and the purchasing of new waste collection vehicles for different waste streams. The DRS system was also receiving new investments, as the company pushed forward with the optimization of the system, and increasing its availability to the population.
- ▶ Besides capital investment, MOHU remained involved in discussions and communication with stakeholders, in order to raise awareness to foster more efficient separate waste collection, and direct materials from disposal to material recovery. This includes educational campaigns, discussions with partners, and identifying development opportunities for treatment processes, in waste streams such as paper, plastic, metal, or wood, and stakeholders including educational institutions, subcontractors, or governmental bodies.

#### Decarbonisation actions in the Exploration & Production segment

- ▶ The leading decarbonization project in Upstream with significant emission reduction of more than 100 ktpa is the construction of CO<sub>2</sub> compressor station at Ethane Plant in Croatia, designed to compress CO<sub>2</sub> separated from natural gas. This project is part of the EOR (Enhanced Oil Recovery) program which aims to reduce CO<sub>2</sub> emission through recycling and injecting it back to the system. The implementation is ongoing.
- ▶ Two Upstream projects that were completed in 2025 with considerable GHG reduction are Replacement of stripping gas with Nitrogen at CPF TEG dehydration units in Pakistan with emission reduction of 8 ktpa, and Electric power production from steam turbine in Croatia with emission reduction of 10 ktpa.
- ▶ Geothermal opportunities are currently being investigated in CEE.

### 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 2025 double materiality assessment takes both impacts of the operations and value chains on climate change, and financial implications of climate change on current and future performance, including related risks and opportunities into consideration:

- ▶ Processes for identifying actual and potential environmental impacts and risks—covering climate change, GHG management, and energy—are embedded in Element 2: Risk & Change Management of the *Health, Safety and Environment Management System (HSE MS)*.
- ▶ Energy efficiency and performance are systematically addressed at site level through ISO 50001-certified Energy Management Systems, while climate-related considerations are integrated into ISO 14001 Environmental Management Systems. These standards provide a structured framework for identifying, evaluating, and mitigating climate and energy-related risks.
- ▶ Physical climate-related risks are also considered during the annual climate vulnerability assessment, aligned with the EU Taxonomy requirements, covering site-specific exposure to extreme weather events and long-term climatic changes.
- ▶ Internally developed macroeconomic scenarios (as described in Scenario Analysis of the Management Discussion and Analysis part of this report) associated climate pathways inform business planning, investment decisions and strategic resilience planning.
- ▶ Results of these processes are then incorporated into bottom-up Group-level mid-term Enterprise Risk Management, as well as during the strategic risk assessment process of MOL Group.

Information on climate change and energy are aggregated in the double materiality assessment through engagement with internal subject matter experts and business stakeholders, ensuring a comprehensive evaluation of climate-related impacts, risks, and opportunities. The general methodology and consultation process are detailed in Section ESRS 2 IRO-1 of this report.

During the 2025 double materiality assessment, MOL Group identified material impacts, risks, as well as opportunities, concluding Climate Change to be material from both an impact and a financial perspective. The list of material IROs are described in the tables below:

#### Impacts, risks and opportunities related to climate change

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Contribution to the transition to low carbon economy	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 energy transition. One of the key pillars of MOL Group's <i>Shape Tomorrow Strategy</i> 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 CO <sub>2</sub> injection for Enhanced Oil Recovery to reduce carbon footprint and increase productivity.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Gas transportation</li> </ul>	- Short - Medium - Long
Potential positive impact	Transition to renewable energy in the upstream and downstream value chain	The transition to renewable energy across MOL Group's value chains presents a significant opportunity to reduce climate-related impacts and enhance long-term resilience. In the upstream value chain, increased sourcing of bio-based feedstocks and procurement of green electricity are key enablers of decarbonization. In the downstream value chain, the expansion of low-carbon product offerings, including biofuels, e-mobility solutions, and sustainable chemicals, enables customers and end-users to reduce their own emissions.	Upstream and downstream value chain	- Short - Medium - Long
Actual negative impact	Effect on climate	MOL Group's operations are associated with high greenhouse gas (GHG) emissions during its own operations (Scope 1 and Scope 2). MOL Group acknowledges that via its GHG footprint it contributes to climate change, affecting both people and the environment.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> <li>- Gas transportation</li> </ul>	- Short - Medium - Long
Actual negative impact	Scope 3 GHG emission of products in the upstream and downstream value chain	Scope 3 greenhouse gas emissions associated with MOL Group's products represent a significant climate impact across both upstream and downstream value chains. In the upstream value chain, emissions mainly arise from the extraction, processing, and transport of crude oil, natural gas, and other feedstocks. Procured construction materials also tend to have a high carbon footprint; therefore, establishing new industrial sites contributes to increased Scope 3 emissions. In the downstream value chain, the combustion of sold products—particularly diesel and gasoline—constitutes the largest part of emissions associated with MOL Group's value chains.	Upstream and downstream value chain	- Short - Medium - Long
Risk	Physical risk from climate-induced extreme weather events	Climate change is expected to increase the frequency, severity, or duration of extreme weather events such as floods, heatwaves, storms, and droughts. Such events may damage physical assets, disrupt logistical or industrial processes, or pose health and safety risks to personnel. These disruptions could lead to increased operational costs, reduced asset availability, or impairments, thereby affecting financial performance or long-term resilience.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Gas transportation</li> </ul>	- Short - Medium - Long
Risk	Capital access risk due to delayed climate neutrality efforts	Investors and financial institutions increasingly integrate climate-related criteria into capital allocation, favouring companies with credible decarbonisation pathways. A delay in implementing effective climate neutrality strategies may result in reduced access to green or transition finance, higher risk premiums, or exclusion from sustainable investment portfolios. For MOL Group, this could limit financing options or increase the cost of capital, affecting long-term financial flexibility and investment capacity.	Own operations: Group-level	- Short - Medium - Long
Risk	Transition risk: Cost of GHG emissions and compliance	The EU Emissions Trading Systems (ETS I and ETS II), the Carbon Border Adjustment Mechanism (CBAM), and the Methane Regulation are increasing the regulatory costs associated with greenhouse gas emissions. These frameworks expose the company to both rising and volatile carbon prices, creating uncertainty in cost forecasts and investment planning. Such developments may negatively impact the profitability of emissions-intensive activities and pose financial risks under evolving climate policy scenarios.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> </ul>	- Short - Medium - Long
Risk	Regulatory risks from energy efficiency and renewables	Due to its current fossil fuel-based business model, MOL Group is exposed to regulatory developments promoting energy efficiency and the use of renewable energy. EU legislation, such as the Energy Efficiency Directive (EED) and Renewable Energy Directive (RED III), requires industrial actors to adopt lower-emission and energy-saving technologies. These often involve high capital costs and technical uncertainty. Compliance may constrain short-term competitiveness and increase the cost of maintaining licence to operate.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> <li>- Gas transportation</li> </ul>	- Short - Medium - Long
Risk	Market risk due to climate-related shifts in demand	Energy transition, regulatory changes, and evolving customer preferences may reduce demand for fossil fuel-based products over time. This shift could affect product margins, asset utilisation, or long-term investment returns,	Own operations: Group-level	- Short - Medium - Long

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
		especially in carbon-intensive segments. For MOL Group, misalignment with changing market expectations may lead to reduced competitiveness or market share loss in key product lines.		
Opportunity	Green hydrogen production	Green hydrogen is expected to play a major role in heavy industry and transportation decarbonization. Business cases can be built on leverage existing infrastructure and expertise in large-scale industrial processes to produce green hydrogen via electrolysis using renewable energy sources.	Own operations - Refining	- Short - Medium - Long
Opportunity	Renewable energy production & storage	As renewable energy is a key enabler of reducing GHG emissions, investing in production and storage capacities can provide business cases both by providing cheap and sustainable energy source for own operations and be entering the green electricity market by external sales.	Own operations: Group-level	- Short - Medium - Long
Opportunity	Leveraging subsurface expertise (geothermal, lithium & Carbon Capture & Storage)	Expertise in subsurface exploration from oil and gas exploration activities can be applied to various business cases crucial to achieving net zero GHG targets: mapping geothermal energy sources, lithium extraction, and enable carbon capture & storage by identifying suitable storage sites.	Own operations - Exploration & production	- Short - Medium - Long
Opportunity	Electrification & energy efficiency projects	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 operations.	Own operations - Exploration & production - Petrochemicals - Refining - Consumer Services - Circular Economy Services - Gas transportation	- Short - Medium - Long
Opportunity	Access to Green Finance	MOL Group's transformation towards a low-carbon, circular business model creates opportunities to secure preferential financing from green bonds, sustainability-linked loans, and funding instruments. These mechanisms can reduce the cost of capital for projects aligned with MOL Group's ESG targets.	Own operations: Group-level	- Short - Medium - Long

The climate related impacts, risks and opportunities have strong interconnections with other environmental and social topics, such as resource use and circular economy, consumers and end-users. Further information can be found in the respective chapters:

- Providing sustainable mobility services (Chapter S4)
- Supply chain engagement / Responsible sourcing (Chapter G1)
- Risk due to water availability (Chapter E3)
- E-charging network (Chapter S4)
- Waste-based fuel usage & production (Chapter E5)
- Sustainable aviation fuel (Chapter E5)
- Biogas production (Chapter E5)
- Sustainable chemicals (Chapter E5)
- Waste management services (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 recognizes 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 and approach to manage financial effects and risks associated with GHG emission related regulations and adaptation to climate change, whilst seeking business opportunities in the area of green transition is expressed at all layers of our policies:

- Strategic level:** The long-term business strategy of MOL Group (*Shape Tomorrow Strategy*) aims at transforming our traditional fossil-fuel-based operations into a low-carbon, sustainable business model.
- Business unit level:** Business specific processes related to climate change mitigation and adaptation are outlined in each business unit's respective Area Books.
- 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.

In developing and maintaining its climate-related policies, MOL Group considers the interests and expectations of key stakeholder groups, including employees, investors, financial institutions, regulators, business partners and customers. Stakeholder views are incorporated through structured engagement processes such as the double materiality assessment, regulatory consultations, and ongoing dialogue with financial and commercial partners. MOL Group makes its key sustainability-related policies publicly available through its corporate website and sustainability communication channels, ensuring access for potentially affected stakeholders.

The overarching climate strategies and policies of MOL Group are outlined in its *Shape Tomorrow Strategy*, 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.

#### 1. Business unit level:

MOL Group's key business units 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.

## 2. 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 organization.

*MOL Group Health, Safety & Environment Management System* (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 contents of the specific elements are explained throughout this report based on their relevancy to the topic.

*HSE MS* is applicable for all types of operations and projects; and manages operational integrity through the lifecycle of the assets. Requirements 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 minimize 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 acceptable during normal operations. 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:
  - ▶ Methane, ETS I and II: local-level process descriptions are in place to ensure legal compliance.
  - ▶ In each high GHG intensity business GHG reduction plans are in place and executed to ensure carbon neutrality.
  - ▶ Compliance with the CBAM regulation is covered by local-level processes.

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 CO<sub>2</sub> inventories while also providing flexibility for Emitting Entities managing their business models. Further

information on tasks and responsibilities, can be found in Detailed rules on Environmental Stewardship (Element 7) - CO2 Management, which is an Appendix to the HSE MS.

## INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

/ESRS 2 – GOV 3/

MOL integrates climate-related considerations into the short-term incentive (STI) scheme of its management bodies and middle & top management through a dedicated ESG performance component. Within this framework, Scope 1 and 2 GHG-emission-reduction performance represents 5% of the overall STI calculation, with the final result subject to upward or downward adjustment depending on actual performance. This element ensures that a measurable portion of annual variable remuneration is directly linked to progress on sustainable GHG reduction as well as safety outcomes, thereby supporting the Group's medium- and long-term decarbonization commitments.

Performance against these metrics is assessed annually using a structured methodology that evaluates progress against predefined targets derived from MOL's multi-year emission-reduction plans. The ESG component—through its 5% GHG contribution and its capacity for positive or negative deviation—ensures that climate-related performance has a tangible financial impact on STI outcomes.

This helps reinforce accountability and incentivizes delivery of the Group's GHG-reduction objectives. The remuneration scheme of the administrative and supervisory bodies does not include such elements. More information is available in ESRS 2 – General disclosures of this sustainability statement, while MOL Group's *Remuneration Policy and Remuneration Report* can be found in Section 8 of the Corporate Governance Declaration in the Integrated Annual Report and in the Annual General Meeting materials.



## METRICS RELATED TO ENERGY CONSUMPTION AND MIX

/E1-5/

ENERGY CONSUMPTION AND MIX	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
<b>TOTAL ENERGY CONSUMPTION</b>	<b>MWh</b>	<b>27,884,567</b>	<b>29,321,564</b>	<b>26,941,634</b>	<b>27,183,633</b>	E1-5-01
o/w from own generation (including non-fuel)	MWh	25,390,859	26,825,723	24,449,135	24,449,135	
o/w indirect energy	MWh	2,493,707	2,495,841	2,492,500	2,734,498	
<b>Total fossil energy consumption</b>	<b>MWh</b>	<b>26,531,472</b>	<b>27,407,525</b>			E1-5-02
o/w coal and coal products	MWh	0	0			E1-5_10
o/w crude oil and petroleum products	MWh	3,292,991	3,374,179			E1-5-11
o/w gas	MWh	21,392,822	21,688,760			E1-5-12
o/w other fossil sources	MWh	483,047	991,383			E1-5-13
o/w purchased or acquired electricity, heat, steam, and cooling	MWh	1,362,611	1,353,202			E1-5-14
<b>Total nuclear energy consumption</b>	<b>MWh</b>	<b>850,855</b>	<b>848,116</b>			E1-5-03
<b>Total renewable energy consumption</b>	<b>MWh</b>	<b>502,240</b>	<b>1,065,924</b>			E1-5-05
o/w fuel from renewable sources	MWh	27,948	575,255			E1-5-06
o/w purchased or acquired electricity, heat, steam, and cooling	MWh	280,241	294,523			E1-5-07
o/w self-generated non-fuel renewable energy	MWh	194,051	196,145			E1-5_08
<b>ENERGY MIX</b>						
Share of fossil sources in energy consumption	%	95.15	93.46			E1-5-15
Share of nuclear sources in energy consumption	%	3.05	2.92			E1-5-04
Share of renewable sources in energy consumption	%	1.80	3.61			E1-5-09
<b>TOTAL ENERGY PRODUCTION</b>	<b>MWh</b>	<b>9,405,255</b>	<b>10,732,726</b>			
o/w fossil energy	MWh	9,194,802	9,781,858			E1-5-16
o/w renewable energy	MWh	210,453	950,868			E1-5-17
<b>ENERGY INTENSITY</b> (from activities in high climate impact sectors)	MWh/million HUF	N/A	3,37	N/A	2,96	E1-5_18

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). The total energy consumption of MOL Group in 2025 was 27.9 million MWh (considering HSE MS scope), a 3.50% increase compared to 2024, in-line with higher production volumes, specifically of the main Downstream production units, trends elaborated in the section on GHG emissions below. The increase is larger (7.9%) when considering the scope of financially consolidated companies, since the energy consumption of companies in the Circular Economy segment has been added to the reporting from 2025.

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. The main part of energy consumption is from direct combustion of fossil fuels – primarily gaseous fossil fuels including natural gas as well as inert gases (21,4 million MWh), and petroleum products (3,3 million MWh). Also considering the purchased energy, the total share of fossil-based energy consumption accounts for over 95% of the total mix, approximately 3% from nuclear based electricity (all purchased energy), while the renewable energy consumption remained below 2% on the HSE MS scope. Considering the scope of consolidated companies, the renewable share is slightly over 3.6%, driven upwards by newly installed solar farms partially used for own consumption, larger share purchased green electricity in the Midstream segment, as well as the amount of biomass combusted in incinerator of MOHU Budapest and the ASEB biogas plant.

### Methodology and assumptions behind energy data

Energy data collection on MOL Group level has been updated in 2025 to allow for more detailed reporting on the energy mix. The methodology and key assumptions are in-line with expectation of ESRS and the GHG Protocol. The key points are as follows:

- ▶ Fuel consumption data are reported in lower heating values.
- ▶ Applied conversion factors are in line with the Energy Conversion Tables of the Canada Energy Regulator. Where direct measurement of emission factors for Scope 1 calculation is not available, the primary source of emission factors is IPCC's CO2 Emissions from stationary/mobile combustion of fossil fuels publications, and the International Carbon Bank and Exchange. For Scope 2 calculation, available factors of the Association of Issuing Bodies: European Residual Mixes and the database of the International Energy Agency are used.
- ▶ Energy data includes processes owned or controlled by MOL Group applying the same perimeter applied for reporting GHG Scopes 1 and 2 emissions. Fuels used as feedstocks and not combusted are excluded.

- ▶ Figures reported under consumption of gas includes all gaseous fossil fuels, including those used for heating, electricity generation, or process energy (excluding liquified petrol gas, which is to be reported under “Other petroleum products”): Natural gas (methane-rich fossil gas), Fuel gas (recovered refinery fuel gas or process gas), Acid Gas Fuel (AFG - recovered gases containing hydrogen sulphide and hydrocarbons), Liquefied natural gas (LNG), Compressed natural gas (CNG), Associated petroleum gas (APG), Synthetic natural gas (when derived from fossil feedstock).
- ▶ Energy that is sourced from within the organisational boundary (MOL Group) are only counted once.
- ▶ Renewable and nuclear share of purchased electricity, heat and steam calculated following the requirements and recommendations of the GHG Protocol.
- ▶ Renewable share of diesel and gasoline consumed are estimated based on average biofuel blending ratios on country level.

## METRICS RELATED TO GHG EMISSIONS

/E1-6/

GREENHOUSE GAS EMISSIONS	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
<b>Gross Scope 1 GHG emissions</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>6.71</b>	<b>7.19</b>	<b>6.36</b>	<b>6.38</b>	E1-6_07
o/w Consolidated accounting group	mn t CO <sub>2</sub> -eq	6.71	7.19	6.36	6.37	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO <sub>2</sub> -eq	0.00>	0.00>	0.01	0.01	E1-6_02
<b>o/w Upstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.83</b>	<b>0.82</b>	<b>0.86</b>	<b>0.86</b>	E1-6_03
<b>o/w Downstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>5.81</b>	<b>5.81</b>	<b>5.41</b>	<b>5.41</b>	E1-6_03
o/w Refining	mn t CO <sub>2</sub> -eq	3.44	3.44	3.14	3.14	E1-6_03
o/w Petrochemicals	mn t CO <sub>2</sub> -eq	1.38	1.38	1.25	1.25	E1-6_03
o/w Power and Heat Generation	mn t CO <sub>2</sub> -eq	0.95	0.95	0.98	0.98	E1-6_03
o/w Other Downstream	mn t CO <sub>2</sub> -eq	0.04	0.04	0.04	0.04	E1-6_03
<b>o/w Midstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.0</b>	<b>0.09</b>	<b>0.0</b>	<b>0.08</b>	E1-6_03
<b>o/w Others</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.08</b>	<b>0.47</b>	<b>0.03</b>	<b>0.03</b>	E1-6_03
<b>Percentage of Scope 1 GHG emissions from regulated emission trading schemes</b>	<b>%</b>	<b>90.89</b>	<b>85.39</b>	<b>89.85</b>	<b>89.85</b>	E1-6_08
<b>Gross location-based Scope 2 GHG emissions</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.56</b>	<b>0.56</b>	<b>0.65</b>	<b>0.65</b>	E1-6_09
o/w Consolidated accounting group	mn t CO <sub>2</sub> -eq	0.56	0.56	0.63	0.64	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO <sub>2</sub> -eq	0.00>	0.00>	0.01	0.01	E1-6_02
<b>Gross market-based Scope 2 GHG emissions</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.90</b>	<b>0.89</b>	<b>0.92</b>	<b>0.92</b>	E1-6_10
o/w Consolidated accounting group	mn t CO <sub>2</sub> -eq	0.90	0.89	0.90	0.90	E1-6_02
o/w Operational control group, excl. Consolidated accounting group	mn t CO <sub>2</sub> -eq	0.00>	0.00>	0.02	0.02	E1-6_02
<b>Total GHG Emissions Scope 1+2 – by business</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>7.27</b>	<b>7.74</b>	<b>6.95</b>	<b>7.03</b>	E1-6_03
<b>o/w Upstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.89</b>	<b>0.87</b>	<b>0.92</b>	<b>0.92</b>	E1-6_03
<b>o/w Downstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>6.22</b>	<b>6.22</b>	<b>5.93</b>	<b>5.93</b>	E1-6_03
o/w Refining	mn t CO <sub>2</sub> -eq	3.68	3.68	3.33	3.33	E1-6_03
o/w Petrochemicals	mn t CO <sub>2</sub> -eq	1.53	1.53	1.47	1.47	E1-6_03
<b>o/w Midstream</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.0</b>	<b>0.09</b>	<b>0.0</b>	<b>0.08</b>	E1-6_03
<b>Scope 1 biogenic emissions</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.01</b>	<b>0.03</b>			E1-6_17

In 2025, MOL Group's total Scope 1&2 GHG emissions increased by 4.6% compared to last year for the HSE MS integrated accounting group, while it increased by 10.1% for the consolidated accounting group. For the former, the increase is driven by higher utilization rates and refinery throughputs, especially in Rijeka refinery, and higher throughput in MOL Group's petrochemical plants. Implemented energy efficiency projects highlighted in this chapter's Action related to climate change offset part of this increase. For the latter, the increase is attributable to the inclusion of the Circular Economy Services segment and other smaller entities for the first time in MOL Group's sustainability reporting, which is also visible through the increased emissions in Scope 1 – Others category.

CAT	GHG EMISSIONS SCOPE 3	UNIT OF MEASURE	2025	2024	ESRS
	<b>Total GHG Emissions Scope 3</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>62.16</b>	<b>56.54</b>	E1-6_11
1	<b>Purchased goods and services</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>2.40</b>	<b>1.85</b>	
	o/w purchased crude oil	mn t CO <sub>2</sub> -eq	1.92	1.39	
	o/w purchased biofuel	mn t CO <sub>2</sub> -eq	0.46	0.46	
2	<b>Capital Goods</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.02</b>	<b>0.02</b>	
3	<b>Fuel and Energy Related Activities</b>		<i>not measured (not material)</i>		
4	<b>Upstream Transportation and Distribution</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>0.26</b>	<b>0.24</b>	
5	<b>Waste Generated in Operations</b>		<i>not measured</i>		
6	<b>Business travel</b>		<b>0.001</b>	<i>not measured</i>	

CAT	GHG EMISSIONS SCOPE 3	UNIT OF MEASURE	2025	2024	ESRS
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	mn t CO <sub>2</sub> -eq	0.99	0.87	
11	Use of sold products	mn t CO <sub>2</sub> -eq	57.30	52.43	
	o/w sold refinery products (excl. naphtha)	mn t CO <sub>2</sub> -eq	53.44	48.55	
	o/w sold natural gas	mn t CO <sub>2</sub> -eq	3.86	3.88	
12	End-of-life treatment of sold products	mn t CO <sub>2</sub> -eq	0.76	0.65	
13	Downstream Leased Assets		not applicable		
14	Franchises		not applicable		
15	Investments	mn t CO <sub>2</sub> -eq	0.46	0.47	
	<b>Total GHG (Scope 1 + Scope 2 location-b. + Scope 3)</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>69.90</b>	<b>63.57</b>	E1-6_11
	<b>Total GHG (Scope 1 + Scope 2 market-b. + Scope 3)</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>70.24</b>	<b>63.84</b>	E1-6_11
	<b>Scope 3 biogenic emissions</b>	<b>mn t CO<sub>2</sub>-eq</b>	<b>1.97</b>	<b>/</b>	E1-6_28

Similarly to the reasons described above, higher utilization of refineries led to an increase in several Scope 3 emission categories as well, most notably in emissions related to purchased crude oil (increased 38% not only due to increased purchased amounts, but also to increased production related emission factor in some of the sourcing countries) and sold refinery products (increased by 10% due to increased refinery throughput and sales). Overall, these trends led to a 10% increase in MOL Group's Scope 3 emissions.

#### 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 (CO<sub>2</sub>) and methane (CH<sub>4</sub>) 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 CO<sub>2</sub> 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. These 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<sub>2</sub>, 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 to and exported from a facility. Other indirect emissions, such as from offsite waste disposal, are specifically excluded. The emission of CO<sub>2</sub> is obtained by multiplying the net amount of energy imported by a CO<sub>2</sub> 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<sub>2</sub> 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 of Scope 3 GHG emission:

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 6 (Business travel)
- ▶ 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<sub>2</sub> footprint of its production. For the calculation of CO<sub>2</sub> emissions, MOL Group uses the average-data method calculation and applies CO<sub>2</sub> conversion factors from the Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 ([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 2025, 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<sub>2</sub> emissions, MOL Group uses the average-data method calculation and applies CO<sub>2</sub> 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 produced 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<sub>2</sub>-eq conversion factors from the Greenhouse gas reporting: conversion factors used for the 2025 GHG calculation were obtained from the UK Government ([LINK](#)), CEFIC ([LINK](#)), and GLEC ([LINK](#)).
- ▶ **Category 6 – Business Travel:** MOL Group includes in its Scope 3 calculation the greenhouse gas emissions arising from employee business travel booked through Group travel providers and internal expense systems. For the 2025 reporting cycle, two distinct data streams are used, each applying the most appropriate available methodology and underlying emission factors: data provided by travel agencies apply either aircraft- and duration-specific fuel burn factors or distance-based emission factors; where such data from the respective travel agencies was not available, a spend-based calculation was applied based on MOL Group's internal expense system.
- ▶ **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<sub>2</sub>-eq conversion factors based on product categories. Conversion factors used for the 2025 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 2025, for the CO<sub>2</sub> Emission Factor (conversion rates) of its different sold refinery products, MOL Group applies IPCC's emission factors for mobile ([LINK](#)) and stationary ([LINK](#)) combustion. Furthermore, standard net calorific values are based on the United Nations Statistics Division ([LINK](#)) except for natural gas where the Hungarian average annual net calorific value is applied from MEKH ([LINK](#)). The methodology includes references to "global warming potential" (GWP). MOL Group includes in the calculation the CO<sub>2</sub> 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<sub>2</sub>-eq 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 (2025 MOL Group sales are available from the 2021-2025 Data Library) are made up of 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, 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 Analysis" 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 2025 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 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 out 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 certificates 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.

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 2025 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.

## METRICS RELATED TO COVERAGE OF MANAGEMENT SYSTEMS

MOL Group applies standard based management systems throughout its operations in order to ensure consistent governance, legal compliance, and continual improvement in environmental, health and safety performance. The below table includes information on the coverage of selected standard based management systems. The calculation is in proportion to headcount. Information on coverage of ISO 45001 standard is available in the S1-B: Worker Health and Safety Management chapter of this report.

COVERAGE OF MANAGEMENT SYSTEMS IN PROPORTION TO HEADCOUNT	UNIT OF MEASURE	2025	2024	ESRS
Operational sites with an ISO 9001 Quality management systems certification	%	68.15	no data	-
Operational sites with an ISO 14001 Environmental management systems certification	%	51.17	no data	-
Operational sites with an ISO 50001 Energy management systems certification	%	56.95	no data	-

## 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 85.39% 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.

In determining these carbon price trajectories, MOL relies on a proprietary ETS price model built on three core drivers: macroeconomic activity shaping allowance demand, regulatory tightening reducing allowance supply, and the breakeven point of key decarbonisation technologies. The model integrates publicly available EU ETS policy schedules and macroeconomic outlooks as input parameters. These sources are considered relevant because they directly influence both the regulatory environment in which MOL operates and the technology cost curves determining long-term investment competitiveness. As a result, MOL's internal carbon price reflects a forward-looking view consistent with policy-driven decarbonisation pathways and the expected cost parity ranges for CCS, renewable energy and green hydrogen deployment.

CO<sub>2</sub>-related costs from EU ETS and the Hungarian CO<sub>2</sub> 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<sub>2</sub> 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<sub>2</sub> emissions, factoring in market prices, forward contract rates, and Upstream Emission Reduction (UER) quotas for EU Fuel Quality Directive compliance.

Further information on the assessment of useful life of tangible and intangible assets is available in the Material accounting policies and other explanatory information chapter of MOL Group's Consolidated Financial Statement under Effect of climate-related matters and energy transition on the significant accounting estimates and in the chapter 'Impairment of assets'.



## EU TAXONOMY REPORT

### INTRODUCTION AND LEGAL BACKGROUND

Based on Article 8 of Regulation (EU) 2020/852 (hereinafter Taxonomy Regulation)<sup>13</sup>, 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<sup>14</sup> 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 4 of this chapter.

### GENERAL APPROACH

For financial year 2025, 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<sup>15</sup> (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 Group's 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. In 2025 MOL Group developed and published its Green Finance Framework.

In 2025 the European Commission adopted a Delegated Act under the Omnibus package, amending the Taxonomy Disclosure, Climate and Environmental Delegated Acts to simplify and streamline the application of the EU Taxonomy. The Omnibus amendments took effect officially on 1 January 2026. They are applicable to the 2025 reporting period, although companies may choose to defer their application to the 2026 reporting period.

The amendments aim to reduce administrative burden, particularly for non-financial undertakings. Under the revised rules, companies are no longer required to assess Taxonomy alignment for activities deemed financially non-material, defined as those representing less than 10% of total turnover, capital expenditure (CapEx) or operational expenditure (OpEx). Companies are also exempt from alignment assessment for their total operational expenditure where OpEx is considered non-material in relation to the business model. In addition, reporting templates have been simplified, reducing required datapoints by approximately 64%, and certain criteria related to pollution prevention and control — especially those concerning the presence and use of chemical substances — have been streamlined within the Do No Significant Harm (DNSH) framework.

MOL Group has reviewed the amendments and incorporated those considered relevant to the organisation for 2025. Accordingly, for the current reporting year, EU Taxonomy disclosures are presented using the updated reporting templates. The amendments affecting Appendix C will be implemented in the screening of the relevant economic activities. As operational expenditure (OpEx) remains financially material to the Group, this indicator continues to be reported. Although the amended framework introduces a materiality threshold, MOL Group has elected not to apply it at this stage, reflecting our continued commitment to transparency in the sustainability area. As a result, we continue to disclose a full company-wide assessment on all EU taxonomy KPI.

<sup>13</sup> 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

<sup>14</sup> 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)

<sup>15</sup> 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.



## 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)). 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 provide a step-by-step guidance for project teams.

## 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*)<sup>16</sup> 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 Environment 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)<sup>17</sup> 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<sup>18</sup>. 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 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.

<sup>16</sup> Appendix A (Generic Criteria for Climate Change Adaptation) of ANNEX I of Delegated Regulation (EU) 2021/2139

<sup>17</sup> [The European Climate Adaptation Platform Climate-ADAPT \(2024\)](#)

<sup>18</sup> 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

During proofing compliance with criteria set out by **Appendix B<sup>19</sup>** (*i.e. compliance with Sustainable use and protection of water and marine resources criteria*) and **Appendix D<sup>20</sup>** (*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 prove the compliance an internal screening template has been created. The Appendix B and D screening was conducted by involving project managers, HSE and permitting experts.

During the screening of **Appendix C<sup>21</sup>** (*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 detail with an internal screening template. In case of a relevant activity the internal REACH expert is involved in 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<sup>22</sup> issued by the EU 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*<sup>23</sup> 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 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. MOL Group is committed to respecting human rights and fully complies with all applicable laws in every country where it operates. There has been one civil court case involving INA d.d., initiated in 2015 by a former employee. In March 2025, the court issued a final judgment in favor of the claimant, and INA d.d. duly complied with the decision. MOL Group consistently cooperates fully with authorities and other stakeholders to clarify any allegations and uses its full leverage to implement corrective measures whenever necessary.

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.

<sup>19</sup> 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

<sup>20</sup> Appendix D (Generic Criteria for DNSH to Protection and Restoration of Biodiversity and Ecosystems) of ANNEX I of Delegated Regulation (EU) 2021/2139

<sup>21</sup> 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

<sup>22</sup> Final Report on Minimum Safeguards, Platform on Sustainable Finance, October 2022

<sup>23</sup> [Code of Ethics and Business Conduct \(2024\) MOL Group](#)

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 2025 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)<sup>24</sup>, however, in some cases 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 centres 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 in 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 relevant 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.

For the numerator calculation in the case of profit centres 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 2025, with extensive assessment of processes. Activities were analysed 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.

### 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. All projects go through extensive preparation in terms of documentation and financial approval; EU taxonomy relevancy of the projects are reviewed from early phase of the project preparation lifecycle, before any financial commitment authorization is approved. 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 2025 has been considered.

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

<sup>24</sup> 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)

asset movement table of the Consolidated Financial Statements of the Annual Financial Report. 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 are 10.8%, in OpEx 36.1%, in CapEx 17.8% for the year 2025. EU Taxonomy aligned activities in turnover is 1.8%, in OpEx 14.3%, in CapEx 12.9% for the year 2025.

Relatively low alignment percentages are partially result of the previously demonstrated facts, that significant part of MOL Group's main activities is related to the oil and gas industry and a conservative approach has been followed in the assessment and reporting.

Furthermore, MOL Group won<sup>25</sup> the Hungarian state concession tender through MOHU (MOHU MOL Hulladékgazdálkodás Zrt.) for waste management services in July 2022 and started the operations on 1<sup>st</sup> 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. Similarly to 2024, CES investments and economic activities were screened on alignment level in 2025.

Financial year 2025					Environmental objective of taxonomy aligned activities											
KPI	Total	Proportion of Taxonomy eligible activities	Taxonomy aligned activities	Proportion of taxonomy aligned activities	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution prevention	Biodiversity and ecosystem	Proportion of enabling activities	Proportion of transitional activities	Not assessed activities considered non-material	Taxonomy aligned activities in previous financial year (2024)	Proportion of Taxonomy aligned activities in previous financial year (2024)	
	USDmn	%	USDmn	%	%	%	%	%	%	%	%	%	%	USDmn	%	
TURNOVER	24 621.4	10.8%	431.2	1.8%	0.2%			1.6%	0.0%		0.0%	0.1%	-	118.0	0.5%	
CAPEX	1 749.5	17.8%	226.5	12.9%	7.5%			4.6%	0.9%		2.4%	5.5%	-	152.0	7.3%	
OPEX	1 883.7	36.1%	262.2	14.3%	0.7%			13.6%	0.0%		0.0%	0.2%	-	91.3	5.5%	

**Table 1:** Summary table of Financial KPIs associated with Taxonomy eligible and aligned economic activities

## TURNOVER

The eligible turnover proportion in 2025 is 10.8%, which is similar to the previous year (9.3%). The aligned turnover proportion increased to 1.8% from last year's 0.5%. The similar results in the eligible turnover proportion are due to our similar EU Taxonomy related activity portfolio compared to 2024 financial year. The increase in the alignment rate this year results from applying a more advanced and refined EU Taxonomy alignment methodology in the case of MOHU. Even though significant proportion of MOHU is related to the transition to circular economy environmental objective, 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, that will generate a growing EU Taxonomy related revenue in the upcoming years.

**Aligned** activities are associated with the following activity categories:

- ▶ *CE 2.3. Collection and transport of non-hazardous and hazardous waste*, linked to MOHU, as the operator of the Hungarian waste management system.
- ▶ *CE 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.
- ▶ *CE 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.
- ▶ *CCM 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.
- ▶ *CCM 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

<sup>25</sup> [MOL wins concession for waste management services \(2022\). molgroup.info](https://molgroup.info)

currently having around 97 MW solar capacity in Hungary and 14 MW in Croatia. This includes newly acquired Naperőműfarm Kft. Solar power plant in Ballószög.

- **CCM 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 Kunststoffe 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.
- **CCM 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.
- **CCM 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<sup>26</sup> 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 50gCO<sub>2</sub>/km emission) criteria. With the continuous modernization of the fleet, the percentage of environmentally friendly vehicles is expected to grow year by year.
- **CCM 6.15. Infrastructure enabling low-carbon road transport and public transport** enabling economic activity<sup>27</sup> is linked to our electric vehicle charging station network, covering nearly 300<sup>28</sup> EV chargers in the CEE region. E-mobility is also one of the key pillars of our mobility solutions.

Details can be found in *Table 2*

Reported KPI		Turnover											
Financial Year		2025											
Economic activities	Code (a)	Taxonomy eligible KPI (Proportion of Taxonomy eligible Turnover)	Taxonomy aligned KPI (monetary value of Turnover)	Taxonomy aligned KPI (Proportion of Taxonomy aligned Turnover)	Environmental objective of taxonomy aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
					Climate Change Mitigation	Climate Change Adaptation	Resource	Water and Marine Resources	Circular Economy	Pollution Prevention			
					%	%	%	%	%	%			
Treatment of hazardous waste	PPC 2.2.	0.0%	0.0	0.0%						0.0%			0.0%
Collection and transport of non-hazardous and hazardous waste	CE 2.3.	1.6%	87.8	0.4%					0.4%				22.2%
Recovery of bio-waste by anaerobic digestion or composting	CE 2.5.	0.0%	0.0	0.0%					0.0%				0.0%
Depollution and dismantling of end-of-life products	CE 2.6.	0.2%	12.1	0.0%					0.0%				24.0%
Sorting and material recovery of non-hazardous waste	CE 2.7.	1.6%	283.8	1.2%					1.2%				70.7%
Manufacture of organic basic chemicals	CCM 3.14.	2.2%	0.0	0.0%	0.0%							T	0.0%
Manufacture of plastics in primary form	CCM 3.17.	4.8%	12.3	0.0%	0.0%							T	1.0%
Electricity generation using solar photovoltaic technology	CCM 4.1.	0.0%	12.1	0.0%	0.0%								100.0%
Cogeneration of heat/cool and power from bioenergy	CCM 4.20.	0.0%	0.0	0.0%	0.0%								0.0%
Electricity generation from fossil gaseous fuels	CCM 4.29.	0.0%	0.0	0.0%	0.0%							T	0.0%
Material recovery from non-hazardous waste	CCM 5.9.	0.1%	19.3	0.1%	0.1%								100.0%
Urban and suburban transport, road passenger transport	CCM 6.3.	0.0%	0.0	0.0%	0.0%							T	0.0%
Operation of personal mobility devices, cycle logistics	CCM 6.4.	0.0%	0.0	0.0%	0.0%								100.0%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5.	0.1%	2.1	0.0%	0.0%							T	6.6%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15.	0.0%	1.8	0.0%	0.0%						E		100.0%
Sum of alignment per objective					0.2%	0.0%	0.0%	1.6%	0.0%	0.0%			
Total KPI Turnover		10.8%	431.2	1.8%							0.0%	0.1%	16.2%

<sup>26</sup> 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.

<sup>27</sup> 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.

<sup>28</sup> Status as of 31 December 2025



**Table 2:** Proportion of turnover from products or services associated with Taxonomy eligible and aligned economic activities

## OPERATING EXPENDITURE (OPEX)

The eligible OpEx proportion in 2025 is 36.1%, which is significantly higher than in the previous financial year (28.4%). The aligned OpEx proportion increased to 14.3%, from the value reported in the previous year (5.5%). The significantly higher eligible and aligned OpEx results in 2025 compared to last year is due to a more sophisticated OpEx methodological approach by MOHU.

Details can be found in *Table 3*

Reported KPI Financial Year		OpEx 2025											
Economic activities	Code (a)	Taxonomy eligible KPI (Proportion of Taxonomy eligible OpEx)	Taxonomy aligned KPI (monetary value of OpEx)	Taxonomy aligned KPI (Proportion of Taxonomy aligned OpEx)	Environmental objective of taxonomy aligned activities						Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
					Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Circular Economy	Pollution Prevention	Biodiversity and Ecosystem			
		%	USDmn	%	%	%	%	%	%	%			
Treatment of hazardous waste	PPC 2.2.	0.3%	0.0	0.0%					0.0%				0.0%
Collection and transport of non-hazardous and hazardous waste	CE 2.3.	19.1%	118.2	6.4%				6.4%					33.7%
Recovery of bio-waste by anaerobic digestion or composting	CE 2.5.	0.5%	0.0	0.0%				0.0%					0.0%
Depollution and dismantling of end-of-life products	CE 2.6.	1.8%	7.6	0.4%				0.4%					23.4%
Sorting and material recovery of non-hazardous waste	CE 2.7.	9.2%	122.9	6.7%				6.7%					72.8%
Manufacture of organic basic chemicals	CCM 3.14.	0.4%	0.0	0.0%	0.0%								0.0%
Manufacture of plastics in primary form	CCM 3.17.	1.7%	3.0	0.2%	0.2%							T	9.6%
Electricity generation using solar photovoltaic technology	CCM 4.1.	0.2%	3.6	0.2%	0.2%								100.0%
Cogeneration of heat/cool and power from bioenergy	CCM 4.20.	0.1%	0.0	0.0%	0.0%								0.0%
Electricity generation from fossil gaseous fuels	CCM 4.29.	0.0%	0.0	0.0%	0.0%							T	0.0%
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30.	0.0%	0.0	0.0%	0.0%								0.0%
Construction, extension and operation of waste water collection and treatment	CCM 5.3.	0.9%	0.0	0.0%	0.0%								0.0%
Material recovery from non-hazardous waste	CCM 5.9.	0.3%	6.2	0.3%	0.3%								100.0%
Operation of personal mobility devices, cycle logistics	CCM 6.4.	0.0%	0.0	0.0%	0.0%								0.0%
Urban and suburban transport, road passenger transport	CCM 6.3.	1.3%	0.0	0.0%	0.0%							T	0.0%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5.	0.4%	0.6	0.0%	0.0%							T	7.3%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15.	0.0%	0.3	0.0%	0.0%						E		100.0%
Sum of alignment per objective					0.7%	0.0%	0.0%	13.6%	0.0%	0.0%			
Total KPI OpEx		36.1%	262.2	14.3%							0.0%	0.2%	39.6%

**Table 3:** Proportion of OpEx from products or services associated with Taxonomy eligible and aligned economic activities.

## CAPITAL EXPENDITURE (CAPEX)

The eligible CapEx proportion is 17.8% in 2025, which is slightly lower than what was reported in the previous year (21.0%). The aligned CapEx proportion is 12.9%, which is significantly higher than the last year's alignment rate (7.3%). 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 development of Deposit Refund System (f) 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 2.7. Sorting and material recovery of non-hazardous waste* includes a project supporting strategic recycling objectives and circularity. The most significant initiative involves investment in rubber waste recycling technologies and the development of advanced waste sorting facilities to increase material recovery rates.
- ▶ *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, Slovakia and Croatia supporting our operations with green electricity generation.
- ▶ **CCM 4.10. Storage of electricity**, covering two new Battery projects at Százhalombatta and Tiszaújváros solar power plants. The systems enhance operational flexibility, support renewable energy balancing for the whole national network and contribute to green hydrogen production, improving overall energy resilience.
- ▶ **CCM 4.13. Manufacture of biogas and biofuels for use in transport and of bioliquids**, linked Szarvas Biogas Plant. The project aims to support the conversion of biogas into biomethane, preparing the site for future RED III compliance and expanding MOL Group's low-carbon fuel portfolio.
- ▶ **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 6.5. Transport by motorbikes, passenger cars and light commercial vehicles** is linked to the purchase of new vehicles for our mobility services.
- ▶ **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 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.
- ▶ **PPC 2.2. Treatment of hazardous waste** aims to create a reliable and efficient hazardous waste incinerator in Danube Refinery. The project aims to ensure safe and compliant treatment of hazardous waste streams, applying Best Available Techniques (BAT) and meeting all required emission standards.

Details can be found in *Table 4*

Reported KPI		CapEx												
Financial Year		2025												
Economic activities	Code (a)	Taxonomy eligible KPI (Proportion of Taxonomy eligible CapEx)	Taxonomy aligned KPI (monetary value of CapEx)	Taxonomy aligned KPI (Proportion of Taxonomy aligned CapEx)	Environmental objective of taxonomy aligned activities							Enabling activity	Transitional activity	Proportion of Taxonomy aligned in Taxonomy eligible
					Climate Change Mitigation	Climate Change Adaptation	Water and Marine Resources	Circular Economy	Pollution Prevention	Biodiversity and Ecosystems				
		%	USDmn	%	%	%	%	%	%	%	%			
Treatment of hazardous waste	PPC 2.2.	0.9%	15.1	0.9%					0.9%			E		100.0%
Collection and transport of non-hazardous and hazardous waste	CE 2.3.	3.7%	63.2	3.6%				3.6%						97.8%
Recovery of bio-waste by anaerobic digestion or composting	CE 2.5.	0.3%	0.0	0.0%				0.0%						0.0%
Sorting and material recovery of non-hazardous waste	CE 2.7.	1.0%	17.3	1.0%				1.0%						100.0%
Demolition and wrecking of buildings and other structures	CE 3.3.	0.0%	0.0	0.0%				0.0%						0.0%
Provision of IT/OT data-driven solutions and software	CE 4.1.	0.1%	0.0	0.0%				0.0%				E		0.0%
Manufacture of hydrogen	CCM 3.10.	0.7%	12.2	0.7%	0.7%									100.0%
Manufacture of organic basic chemicals	CCM 3.14.	5.1%	41.4	2.4%	2.4%								T	46.4%
Electricity generation using solar photovoltaic technology	CCM 4.1.	2.7%	46.5	2.7%	2.7%									100.0%
Storage of electricity	CCM 4.10.	1.2%	21.2	1.2%	1.2%							E		100.0%
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13.	0.1%	2.2	0.1%	0.1%									100.0%
Installation and operation of electric heat pumps	CCM 4.16.	0.2%	0.4	0.0%	0.0%									15.0%
Production of heat/cool using waste heat	CCM 4.25.	0.0%	0.0	0.0%	0.0%									0.0%
Electricity generation from fossil gaseous fuels	CCM 4.29.	0.3%	0.0	0.0%	0.0%								T	0.0%
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30.	0.0%	0.0	0.0%	0.0%								T	0.0%
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1.	0.1%	0.0	0.0%	0.0%									0.0%
Renewal of water collection, treatment and supply systems	CCM 5.2.	0.1%	0.0	0.0%	0.0%									0.0%
Construction, extension and operation of waste water collection and treatment	CCM 5.3.	0.0%	0.0	0.0%	0.0%									0.0%
Renewal of waste water collection and treatment	CCM 5.4.	0.0%	0.0	0.0%	0.0%									0.0%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5.	0.1%	0.1	0.0%	0.0%								T	6.3%
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15.	0.0%	0.4	0.0%	0.0%							E		100.0%
Renovation of existing buildings	CCM 7.2.	0.2%	0.0	0.0%	0.0%									0.0%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3.	1.1%	6.4	0.4%	0.4%							E		34.7%
Sum of alignment per objective					7.5%	0.0%	0.0%	4.6%	0.9%	0.0%				
Total KPI CapEx		17.8%	226.5	12.9%								2.4%	5.3%	72.8%

**Table 4:** Proportion of CapEx from products or services associated with Taxonomy eligible and aligned economic activities.



## POLLUTION

/E2/

### IMPACTS AND RISKS RELATED TO POLLUTION

/E2. IRO-1 11 & AR 1-9/

ESRS	Disclosure Requirement related to ESRS 2 IRO-1
GRI	GRI 3, 3-3 b

MOL Group's industrial operations, where the handling of hazardous materials and complex chemical processes is inherent to the business, carry the risk of harmful substances reaching air, water, and soil. Such pollution can adversely affect environmental quality and human health. These impacts may translate into financial risks for the company, including regulatory obligations, remediation costs, or societal pressure.

Environmental impacts and financial risks related to pollution are monitored and assessed at each relevant site of MOL Group, and local inputs are channelled into the Group-level risk management processes and the double materiality assessment. This includes the regular measurement of emissions, content of effluents, noise pollution, odours associated with operations, as well as monitoring of spills and leaks. Assessment of impacts related to the upstream and downstream value chains relied on publicly available information from key business partners and external databases, as well as ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

Identified material impacts and risks of MOL Group related to pollution are described in the table below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual negative impact	Effect on air quality	MOL Group's operations entail emissions to air such as Sulphur Dioxide (SO <sub>2</sub> ), Nitrogen Oxides (NO <sub>x</sub> ), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Particulate Matters (PM), which negatively affect the health of people and other living organisms.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> </ul>	- Short term - Medium term - Long term
Actual positive impact	Contribution to reducing air pollution	MOL Group is dedicated to contributing to reducing air pollution by enabling cleaner energy use across industries and communities. Through the production of hydrogen, biofuels, and other low-emission alternatives, it supports the shift away from high-pollution fuels. These actions help reduce harmful pollutants in the regions where its products and partnerships are active.	Own operations <ul style="list-style-type: none"> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Gas transportation</li> </ul>	- Short term - Medium term - Long term
Potential negative impact	Soil and groundwater pollution	MOL Group handles significant volumes of hydrocarbons across its operations. Accidental spills or leaks—resulting from equipment failure or human error—can occur. These incidents may lead to the contamination of soil and groundwater, posing risks to ecosystems, biodiversity, and potentially human health.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Refining</li> <li>- Gas transportation</li> </ul>	- Short term - Medium term Long term
Potential negative impact	Marine pollution	MOL Group's offshore and coastal operations pose potential risks to marine environments, including seawater pollution from spills or discharges. The company enforces strict environmental safeguards and emergency protocols to prevent and mitigate such incidents, ensuring compliance with international standards and protection of marine ecosystems.	Own operations <ul style="list-style-type: none"> <li>- Refining</li> </ul>	- Short term - Medium term Long term
Potential negative impact	Water pollution	MOL Group's operations generate wastewater that may contain residual hydrocarbons, chemicals, or other pollutants resulting from industrial processes. Even when treated, these substances can enter natural water bodies through permitted discharges, having a potential effect on water quality and aquatic ecosystems.	Own operations <ul style="list-style-type: none"> <li>- Petrochemicals</li> <li>- Refining</li> </ul>	- Short term - Medium term Long term
Potential negative impact	Impact of hazardous chemical use in the upstream and downstream value chain	Hazardous chemicals are widely used across MOL Group's value chains, posing risks to human health and ecosystems. This is considered a material negative impact both in the upstream value chain particularly in case of suppliers of manufactured goods, and in the downstream value chains of the petrochemical segment as buyers of base chemicals and polymer compounds handle hazardous intermediates and solvents.	Upstream and downstream value chain	- Short term - Medium term - Long term
Potential negative impact	Pollution and toxic waste in the upstream and downstream value chain	Oil refining and petrochemical activities generate complex waste streams that can lead to soil, water, and air contamination if not properly managed. In the upstream value chain, spent catalysts, oily sludge, and wastewater containing hydrocarbons and heavy metals are major sources of pollution. In the downstream value chain, improper disposal of petrochemical byproducts and plastic waste can release toxic substances, including persistent organic pollutants, into ecosystems.	Upstream and downstream value chain	- Short term - Medium term - Long term
Risk	Rising environmental compliance and mitigation costs - air pollution	Tightening regulatory expectations, such as those under the Industrial Emissions Directive (IED), may increase the cost of maintaining compliance with permitted emission levels during normal operations. In addition, specific industrial activities—such as maintenance shutdowns, equipment upgrades,	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> </ul>	- Long term

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
		or unplanned incidents—can result in temporary emission peaks, triggering additional mitigation measures or liabilities. For MOL Group, both regulatory-driven upgrades and event-related interventions may lead to increased CAPEX, OPEX, or financial consequences linked to non-compliance.	<ul style="list-style-type: none"> <li>- Consumer Services</li> <li>- Circular Economy Services</li> </ul>	
Risk	Rising environmental compliance and mitigation costs - water & soil pollution	Environmental regulations are increasingly targeting the prevention and remediation of water and soil contamination, requiring stricter control of effluents, leakages, and accidental discharges. Compliance obligations may tighten under existing frameworks (e.g. Water Framework Directive, Soil Strategy), demanding additional investments in infrastructure, monitoring costs, or process adjustments and potentially triggering remediation costs or liabilities.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> </ul>	- Long term

MOL Group's 2025 double materiality assessment concluded that the topic pollution is material from both impact and financial perspective:

- ▶ Emissions of sulphur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOCs), carbon monoxide (CO), and particulate matter (PM) are generated primarily by refining, petrochemicals, exploration and production, and waste management activities. These emissions can negatively affect air quality, human health, and ecosystems.
- ▶ Accidental spills or leaks of hydrocarbons and chemicals—mainly during oil production and transportation, refining, and gas transportation activities — can lead to soil and groundwater contamination, impacting ecosystems and potentially human health.
- ▶ Industrial processes, especially in refining and petrochemical production, generate wastewater that may contain residual hydrocarbons and chemicals. Even after treatment, permitted discharges can affect water quality and aquatic ecosystems.
- ▶ Offshore and coastal operations, particularly in refining, pose risks of seawater contamination from spills or discharges, with potential impacts on marine environments.
- ▶ Tightening environmental regulations (e.g., Industrial Emissions Directive, Water Framework Directive) increase compliance and mitigation costs. These requirements affect all major industrial activities and may result in additional investments, operational costs, or liabilities in case of non-compliance.
- ▶ While these impacts are most pronounced in our core industrial activities, MOL Group is also committed to reducing pollution through the production of cleaner energy alternatives—such as hydrogen and biofuels—and by supporting the shift away from high-pollution fuels.
- ▶ The topic of microplastics have also been assessed but currently have been concluded to be non-material. However, due to the evolving microplastic regulatory framework by the European Union related to microplastics, this is a closely monitored topic especially in relation to MOL Group's petrochemical production and associated value chains.

This chapter describes how these material impacts and risks are managed across MOL Group's operations.

Since a significant amount of emissions and waste is generated in the supply chain and by businesses using MOL Group's products, the impact of actors in the upstream and downstream value chains is also considered material. Mitigation of such negative impacts is possible through rigorous responsible procurement policies and operating a whistleblower system, as described in Chapters G1 and S1-C of this report. MOL Group—as laid out in the *Business Partner Code of Ethics*—expects all of its business partners to comply with its norms related to HSE and to adhere to environmental protection laws and regulations at all times. However, the company has limited ability to influence consumer-related impacts arising from the activities of downstream value chain actors. Consequently, no specific management actions or policies are disclosed for these impacts, as they fall outside MOL Group's operational control.

Pollution-related impacts and risks have strong interconnections with other environmental and social topics, such as disturbance of affected communities and impact on biodiversity, and waste generation. Further information can be found in the respective chapters:

- ▶ Disturbance from operations (Chapter S3)
- ▶ Social license to operate: Complaints or local community opposition (Chapter S3)
- ▶ Impact on biodiversity due to land use change (Chapter E4)
- ▶ Impact on biodiversity due to pollution (Chapter E4)
- ▶ Waste generation (Chapter E5)

## POLICIES RELATED TO POLLUTION

/E2-1/

### General policy commitments & management responsibilities

To mitigate the pollution-related negative impacts and risks, MOL Group has established comprehensive policies and practices that prioritize prevention, effective risk management, and long-term remediation, while its business strategy reinforces the commitment to enabling cleaner energy and material use across industries and communities.

MOL Group's commitments to environmental protection, including pollution prevention are outlined in the *Group HSE and Social Impact Policy* and the *Health, Safety and Environment Area Book*. The *Group Health, Safety and Environment Vice President* is the process owner of these policies and holds executive responsibility for managing pollution-related impacts and risks across MOL Group operations. Board-level oversight and accountability for sustainability, including pollution control, is provided by the *Sustainable Development Committee* of the Board of Directors.

The *Group HSE and Social Impact Policy*, the *Health, Safety and Environment Area Book* and the HSE Management System are aligned with applicable EU and national environmental legislation and permitting requirements. In addition, they reflect internationally recognised standards and frameworks, including ISO 14001 Environmental Management System requirements and the relevant Best Available Technique (BAT) conclusions and BREF documents applicable to MOL Group operations.

In establishing and periodically reviewing these policies, MOL Group takes into account the expectations and requirements of key stakeholders, primarily regulatory authorities, as reflected through environmental legislation and permitting processes. The interests of local communities and other affected stakeholders are also considered through compliance obligations, impact assessments and internal governance processes.

Pollution-specific process-based regulations addressing mitigating negative impacts related to pollution of air, water and soil are outlined in Element 7: Environmental Stewardship of the *HSE MS*:

- ▶ In general all the operated technologies are in compliance with the associated emission limits and associated emission performance levels 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. Where the above mentioned are not completely fulfilled, the corrective actions were defined, and the action plan implementation is planned or already ongoing.
- ▶ 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.

### Protection of air quality

Process-based policies related effect on air quality are described in section Air protection under Element 7: Environmental Stewardship of the *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.
- ▶ Venting (releasing gas without burning) and routine flaring (burning excess gas to prevent its release into the atmosphere) are eliminated during normal operations – except for emergencies or equipment malfunctions. Where feasible, flaring is preferred over venting to reduce environmental impact. Non-routine flaring, such as during start-ups or shutdowns, is minimized.
- ▶ A Leak Detection and Repair program is implemented in the Downstream Production and partially in the Upstream businesses to identify, measure, and reduce emissions from fugitive sources, such as unintentional leaks from valves, seals, and other equipment.

### Soil and groundwater protection

Process-based policies related to the effect on air quality are described in section Soil and groundwater under Element 7: Environmental Stewardship of the *HSE MS*:

- ▶ Desktop risk assessment is performed, and updated after relevant changes for all operated sites, action plans/remediation programs for high-risk findings, with the definition of necessary actions, foreseeable financial demands, responsibilities and a timeline are prepared.
- ▶ Environmental performance is 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.

#### Effluent management

Process-based policies related to effluent management are described in section Water protection and efficient use under Element 7: Environmental Stewardship of the *HSE MS*:

- ▶ 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 is ensured.
- ▶ Establishment of separated sewage system is required (contaminated/potentially contaminated and non-contaminated lines) in case of new and refurbished technologies.
- ▶ Regular water emergency drills are conducted at the frequency and the scenario defined in local level regulations based on the main operational risks and business/site specifications.

#### Hazardous chemicals

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 of 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.

In 2025 MOL Group concentrated pollution mitigation on five practical levers: (1) stabilising air emission performance in refining, petrochemicals and waste-to-energy; (2) tightening spill and leakage prevention through pipeline integrity and emergency readiness; (3) remediating or containing soil and groundwater impacts at legacy and operational sites; (4) launching projects to strengthen wastewater treatment reliability; and (5) upgrading monitoring/measurement (LDAR, online analysers, inspections) to catch issues earlier and reduce abnormal releases. In 2025, MOL Group allocated 620 million HUF for air protection and 2,090 million HUF for soil and groundwater protection within its operational expenditures, which cover – beside many other smaller initiatives – the below described actions.

Air emissions control was anchored by the steady operation of large assets. Slovnaft kept roughly 80% of pollutant streams on continuous emission monitoring, a foundation for compliance that, together with a lower sulphur crude blend, resulted in an ~8% decrease in SO<sub>2</sub> despite higher processing levels — evidence that feedstock management interacts materially with end of pipe outcomes. In petrochemicals, MPC's load and maintenance cadence produced decreases in NMVOC/SO<sub>2</sub>/CO/NO<sub>x</sub>, with particulate matter increasing due to different operational conditions during the measurement compared to the previous campaign. On the waste-to-energy side, MOHU Budapest's waste incinerator combined absorber-nozzle cleaning with feedstock acceptance restrictions for certain plastics, both aimed at reducing acidic gas loads (SO<sub>2</sub>/HCl) at source and improving scrubbing performance during operation. Upstream Hungary's reported changes in some air pollutant figures largely reflected expanded coverage and more accurate volume flow calculations under the EU methane rule rather than operational deterioration — a methodological improvement that should support better trend interpretation in future cycles.

Spill and leakage prevention remained a headline theme after two major Logistics pipeline incidents in 2025 (including ~172 m<sup>3</sup> hydrocarbon release at Szabadbattyán). Beyond immediate containment and cleanup, Logistics implemented a package of prevention actions: what contains among other actions ultrasonic testing (UT) of three priority pipelines, with a risk analysis scheduled after the UT results to recalibrate maintenance intervals and reduce recurrence. In Upstream Hungary, where corrosion is the dominant spill driver, the programme combined cathodic protection, aerial patrols, wall thickness measurements, intelligent pigging, corrosion inhibitor regimes, and risk based pipeline replacement under the Surface Integrity framework; several kilometers of line had already been replaced in the prior cycle, and resourcing was slated to increase as incident costs rose — a concrete shift from reactive repair to preventive integrity management. MOL Group Retail operations ran a quieter but systematic prevention track: forecourt checks for concrete cracks, separator replacements, and renewal of worn tanks/piping, cutting the chance of forecourt scale releases to soil or drainage. MOL Romania complemented this with LDAR in depots (staged implementation finishing 2026) to reduce fugitive VOCs and product losses that can translate into air quality issues and groundwater pathways if left unmanaged.

Following the 2024 diesel spill on the Százhalombatta–Pécs product pipeline at the outskirts of Gárdony (further information about the incident can be found in MOL Group's FY2024 sustainability statement), MOL has progressed from incident response to strengthening prevention and early-detection controls across the pipeline system. In 2025, the inspection protocol for protective conduits and venting tubes was fully developed, establishing a consistent approach for assessing these critical components. All implementation tasks have been defined, and responsibilities and deadlines have been assigned to ensure disciplined execution. As part of system-wide risk management, MOL has initiated the creation of a comprehensive inventory database of protective pipe casings across the pipeline network to improve traceability and integrity planning. In parallel, an enhanced, wide-spectrum diagnostic instrument has been integrated into the inspection regime to broaden detection capability and strengthen preventive controls. The two most critical pipeline sections in Hungary have already undergone extraordinary integrity reassessment, and based on the findings, similar inspections have been scheduled in all other relevant countries to support consistent integrity management across the Group.

On soil and groundwater, the subsidiaries continued risk-based remediation and containment. Slovnaft advanced groundwater protection by continuing the well replacement program—and kept longrunning remediation at Klacany depot on track (aromatic hydrocarbon contamination). INA maintained remedial systems at Rijeka (including a multiyear hydraulic barrier project) and progressed sitespecific programmes across retail and upstream footprints in sensitive areas — integrating biodiversity and groundwater risk where they intersect. At the same time, Logistics' 2025 incidents generated large volumes of contaminated soil that were excavated and consigned to compliant treatment/disposal pathways — an immediate pollution containment action paired with the preventive pipeline package noted above.

At the Danube Refinery, an online analyser was installed to provide continuous, channel level oversight and a cluster of Wastewater treatment plant (WWTP) improvement projects designed to prevent overloads and smooth biological performance during operational disturbances. Logistics strengthened compliance at Szajol, completing trial operation of the upgraded WWTP aligned to stricter discharge limits, and kept Komárom upgrades moving — both measures pointed at reducing suspended solids and stabilising effluent quality from depot operations. MPK reported improved treated effluent quality on the back of steadier plant running. Slovnaft maintained stable

performance with lower Danube withdrawal in 2025, avoiding the need for new actions at current loads, and Pakistan continued operations within permitted limits under accredited methods.

Waste and hazardous materials management mirrored the operational year. Logistics saw a steep change in waste volumes driven by contaminated soils from emergency responses and several construction/demolition programmes; while not an emissions action in itself, rapid excavation and compliant routing of these soils is a core pollution-prevention measure that limits migration to groundwater and surface waters and reduces community exposure. MPC tightened segregation and maintained stable recovery performance despite new waste types from Polyol trial operations, and Retail operations widened selective collection (including contaminated packaging and used oil from customers) after improving its survey and reporting methodology — small operational steps that prevent mixed waste from creating secondary pollution at downstream handlers. Slovnaft also expanded retail network separate collection (10% of sites in 2025, with full rollout planned), a system enabler for cleaner streams and fewer problem residues.

Finally, subsidiaries invested in monitoring and compliance tools that reduce the frequency and impact of abnormal events. Romania's LDAR programme plugs a historic gap in depots and complements forecourt integrity measures; Upstream Hungary's adoption of enhanced measurement methodologies under methane regulation increases data reliability for pollutants that had been partially factor-based in prior years. Together, these upgrades lower the probability of spikes in air and water pollutants.

In a year of higher utilisation for several assets, subsidiaries prioritised frontline operational controls (continuous emission and discharge monitoring), prevention programmes (pipeline integrity, LDAR, separator renewals), and remediation/containment where incidents occurred (contaminated soil management, groundwater projects). These actions stabilised pollutant profiles, reduced incident risk, and improved measurement fidelity — the practical conditions needed to sustain compliance and demonstrate year-over-year improvement.

## 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 related to pollution mitigation:

- ▶ **SOx emissions reduction:** MOL Group is committed to reducing its SOx (sulfur oxides) emissions in 2040 below level of 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).
- ▶ **NOx emissions reduction:** MOL Group aims to reduce its NOx (nitrogen oxides) emissions by 2040 below 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 targets are defined based on historical performance data, operational emission measurements and internal environmental reporting systems. Emissions data are derived from site-level monitoring aligned with environmental permits and applicable regulatory requirements. The baseline period (2021–2022) was selected to reflect representative operational performance under normal operating conditions.

The targets are expressed as absolute emission values at Group level and assume stable operational boundaries over the target horizon. The achievement of these targets is primarily driven by operational efficiency improvements, optimisation of combustion processes, implementation of best available techniques (BAT), and continuous compliance with emission limit values defined in environmental permits.

The target-setting process involved relevant internal stakeholders, including environmental and operational experts as well as the ESG function. Regulatory expectations, national and EU air quality objectives and applicable BAT conclusions were taken into account when defining the targets. While the targets are voluntary and not formally linked to a specific external scenario framework, they are consistent with the overall direction of EU air pollution reduction policies.

The targets are based on established scientific understanding of the environmental and health impacts of sulfur oxides and nitrogen oxides, as reflected in EU air quality legislation and BAT reference documents. However, they are not derived from a separate, externally validated scientific modelling exercise.

MOL Group currently does not disclose any additional targets related to water or soil pollution or chemical use.

These voluntary targets reflect 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 provides details on measurement methodologies and data collection processes. Emission monitoring is carried out in accordance with environmental permit requirements applicable at each site, which transpose relevant EU Best Available Technique (BAT) conclusions and BREF documents into operational obligations. Measurement frequency, methodologies and emission limit values are aligned with BAT-associated emission levels (BAT-AELs) where applicable.

Air emissions are calculated in accordance with MOL Group's internal Reporting Handbook using one or a combination of the following methodologies: direct measurement through periodic sampling or online analysers, site-specific calculation methods, published emission factors and, where necessary, justified estimations. Water emissions are primarily determined through regular laboratory analysis in line with environmental permit requirements, with frequency defined either by permit conditions or by source variability and test method reproducibility. Emission measurements are subject to regulatory oversight and compliance verification by competent authorities. Where required by law, measurements are performed by accredited laboratories in accordance with applicable national and EU standards. Beyond regulatory control and the independent sustainability assurance process, no additional external validation of the metrics is performed.

AIR EMISSIONS	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
Sulphur Dioxide (SO <sub>2</sub> )	tonnes	3,497	3,509	3,676	3,678	E2-4_02
Nitrogen Oxides (NO <sub>x</sub> )	tonnes	7,248	7,609	5,349	5,370	E2-4_02
Volatile Organic Compounds (VOC)	tonnes	7,686	6,482	7,560	7,560	E2-4_02
Carbon Monoxide (CO)	tonnes	1,528	1,603	1,112	1,114	E2-4_02
Particulate Matter (PM)	tonnes	282	308	160	160	E2-4_02
Hydro-fluorocarbons (HFCs)	tonnes	0	0	0	0	E2-4_02
Ammonia (NH <sub>3</sub> )	tonnes	0	0	0	0	E2-4_02
PCDD + PCDF (dioxins + furans)	tonnes	0	0	0	0	E2-4_02
Nickel and compounds (Ni)	tonnes	0.4	0.4	0.4	0.4	E2-4_02
Benzene	tonnes	20	17	20	20	E2-4_02

In 2025 changes in MOL Group's emissions to air were mainly driven by variations in production intensity, fuel composition, regulatory methodology updates, and operational factors across business segments. Higher loads at refining and petrochemical plants led to increased emissions of most basic pollutants, particularly at Slovnaft; while MOL Petrochemicals recorded mixed trends due to lower fourth-quarter loads and furnace decoking activities. SO<sub>2</sub> emissions at Slovnaft decreased by approximately 8%, reflecting the processing of lower-sulphur crude blends, which partially offset the effects of higher throughput. In Upstream Hungary, reported increases in CO, NO<sub>x</sub>, and SO<sub>2</sub> were primarily attributable to improved measurement accuracy and expanded reporting requirements under new methane-related regulations. At MOHU, emission fluctuations were influenced by changes in waste composition, while absorber cleaning improved acidic gas removal efficiency. In the Retail segment, VOC emissions remained broadly stable, with minor increases in Romania linked to higher logistics demand, partially offset by fuel-system modernizations in other retailer networks across the Group.

WATER CONTAMINANTS	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
Total Petroleum Hydrocarbons (TPH)	tonnes	19	19	19	19	E2-4_03
Chemical Oxygen Demand (COD)	tonnes	1,841	1,885	1,943	1,943	E2-4_03
Biological Oxygen Demand (BOD)	tonnes	343	352	329	329	E2-4_03
Suspended Solid (SS)	tonnes	675	675	821	821	E2-4_03
Chromium and Compounds (Cr)	tonnes	0.12	0.12	0.07	0.07	E2-4_03
Tetrachloroethylene (PER)	tonnes	0	0	0	0	E2-4_03
Trichloroethylene	tonnes	0	0	0	0	E2-4_03
Trichloromethane	tonnes	0.02	0.02	0.02	0.02	E2-4_03
Total nitrogen	tonnes	0	0	1.24	1.24	E2-4_03
Anthracene	tonnes	0	0	0	0	E2-4_03
Benzene	tonnes	0	0	0	0	E2-4_03
Cadmium and compounds (Cd)	tonnes	0.3	0.03	0.02	0.02	E2-4_03



WATER CONTAMINANTS	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
Copper and compounds (Cu)	tonnes	0.75	0.75	0.64	0.64	E2-4_03
Naphthalene	tonnes	0	0	0	0	E2-4_03
Phenols (as total C)	tonnes	1.93	1.93	2.05	2.05	E2-4_03
Lead and compounds (Pb)	tonnes	0.06	0.06	0.07	0.07	E2-4_03
Zinc and compounds (Zn)	tonnes	1.51	1.51	6.3	6.3	E2-4_03
Polycyclic aromatic hydrocarbons (PAHs)	tonnes	0	0	0	0	E2-4_03
Toluene	tonnes	0	0	0	0	E2-4_03
Phosphorus	tonnes	0	0	0.10	0.10	E2-4_03
Mercury and compounds (Hg)	tonnes	0.01	0.01	0.01	0.01	E2-4_03
Xylenes	tonnes	0	0	0	0	E2-4_03
Fluoranthene	tonnes	0	0	0	0	E2-4_03
Chlorides (as total Cl)	tonnes	0	0	0	0	E2-4_03
Nickel and compounds (as Ni)	tonnes	0.28	0.28	0.21	0.21	E2-4_03
Benzo(g,h,i)perylene	tonnes	0	0	0.02	0.02	E2-4_03

Water pollution indicators showed generally decreased trends across MOL Group, reflecting the combined effects of operational expansion, temporary shutdowns, efficiency measures, and wastewater treatment performance. Retail networks, most Upstream fields, and Slovnaft operations remained broadly stable or showed decreasing pollutant loads, with no material water pollution incidents reported. In Downstream production, increase in COD and BOD occurred following shutdown-related hydraulic and organic load peaks; corrective actions were initiated and wastewater treatment upgrades are in progress. At MOL Petrochemicals, wastewater quality improved, primarily due to stable operating conditions and consistent treatment performance. Slovnaft recorded a decrease in absolute pollutant loads, largely attributable to lower water withdrawal volumes.

#### 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 are 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 (e.g., in some service stations in Retail) will report a zero value.

#### Reporting Coverage

Relevant MOL Group Operating Companies 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 Company 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) report.
- ▶ **Laboratory Analysis:** Figures are 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 AND 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. 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. 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.

Product group	Hazard classes	Amount (2025)
<b>Crude oils</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity category 1AB</li> <li>▪ Chronic hazard to the aquatic environment category 2</li> <li>▪ Germ cell mutagenicity Category 1B</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Specific target organ toxicity                             <ul style="list-style-type: none"> <li>◦ Repeated exposure category 1 &amp; 2</li> <li>◦ Single exposure category 2</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Total Group production: 41,04mboe/day</li> <li>▪ Refinery processing: 14 424 kt</li> <li>▪ Purchased and sold products: 3 306 kt</li> <li>▪ Total crude oil product sales 19 604 kt</li> </ul>
<b>Naphtha products</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity category 1AB&amp;2</li> <li>▪ Chronic hazard to the aquatic environment category 1,2,3</li> <li>▪ Germ cell mutagenicity Category 1B</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Substances of very high concern</li> <li>▪ Specific target organ toxicity – Repeated exposure category 2</li> </ul>	<ul style="list-style-type: none"> <li>▪ Refinery production: 1 344 kt</li> <li>▪ Sales: 0 kt</li> </ul>
<b>Motor gasolines</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity category 1AB&amp;2</li> <li>▪ Chronic hazard to the aquatic environment category 1&amp;2</li> <li>▪ Germ cell mutagenicity category 1B</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Specific target organ toxicity                             <ul style="list-style-type: none"> <li>◦ Repeated exposure category 1&amp;2</li> <li>◦ Single exposure category 2</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Refinery production: 3 679 kt</li> <li>▪ Sales: 4 154 kt</li> </ul>
<b>Diesel and heating oils</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity categories 1B&amp;2</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Chronic hazard to the aquatic environment category 1&amp;2</li> <li>▪ Specific target organ toxicity - Repeated exposure category 2</li> </ul>	<ul style="list-style-type: none"> <li>▪ Refinery production: 7 427 kt</li> <li>▪ Sales: 11 945 kt</li> </ul>
<b>Kerosenes</b>	<ul style="list-style-type: none"> <li>▪ Chronic hazard to the aquatic environment category 2</li> </ul>	<ul style="list-style-type: none"> <li>▪ Refinery production: 623 kt</li> <li>▪ Sales: 779 kt</li> </ul>
<b>Fuel oils</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity Category 1B</li> <li>▪ Germ cell mutagenicity category 1B&amp;2</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Chronic hazard to the aquatic environment category 1&amp;2</li> <li>▪ Specific target organ toxicity - Repeated exposure category 2</li> <li>▪ Substances of very high concern</li> </ul>	<ul style="list-style-type: none"> <li>▪ Refinery production: 480 kt</li> <li>▪ Sales: 451 kt</li> </ul>
<b>Butadiene</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity category 1A</li> <li>▪ Germ cell mutagenicity category 1B</li> <li>▪ Substances of very high concern</li> </ul>	<ul style="list-style-type: none"> <li>▪ Petrochemical production: 61 kt</li> <li>▪ Sales: 60 kt</li> </ul>
<b>Raffinate</b>	<ul style="list-style-type: none"> <li>▪ Carcinogenicity category 1AB</li> <li>▪ Germ cell mutagenicity category 1B</li> <li>▪ Reproductive toxicity category 2</li> <li>▪ Chronic hazard to the aquatic environment category 2</li> <li>▪ Specific target organ toxicity - Repeated Exposure category 2</li> <li>▪ Substances of very high concern</li> </ul>	<ul style="list-style-type: none"> <li>▪ Petrochemical production: 94 kt</li> <li>▪ Sales: 0 kt</li> </ul>

The table above includes the material product groups which has SOC or SVHC content. Comprehensive list of all produced and commercialised material in 2025 cannot be provided on Group level as compliance with relevant regulations is managed locally at different companies within MOL Group's portfolio. Group level data collection process is under development.

## WATER STEWARDSHIP

/E3/

### IMPACTS AND RISKS RELATED TO WATER USE

/E3-1/

ESRS	Disclosure Requirement 2 IRO-1
GRI	GRI 303-1-a;b GRI 303-1-c
IFRS	IFRS 51.55(b)(i)

The operations of MOL Group, particularly its refineries and petrochemical production facilities, require significant volumes of water for cooling, processing, and other industrial purposes. To ensure reliable access to water resources, most of these sites are strategically located near major water bodies. For example, the Danube River provides water proximity for the Százhalombatta Refinery in Hungary and the Bratislava Refinery and petrochemical complex in Slovakia. Similarly, the Tiszaújváros petrochemical facilities are situated near the Tisza River, while the Rijeka Refinery in Croatia is located on the Adriatic coast. This dependence on large-scale water withdrawal creates potential environmental impacts and operational risks.

Environmental impacts and financial risks related to water availability are monitored and assessed at each relevant site, including the measurement of water withdrawal, consumption and discharge, and monitoring the water infrastructure and capabilities. Local inputs are channelled into the Group-level risk management processes and the double materiality assessment. Assessment of impacts related to the upstream and downstream value chains relied on publicly available information from key business partners and external databases, as well as ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

In addition to these monitoring and assessment activities, MOL Group places strong emphasis on maintaining ongoing dialogue with local stakeholders, recognising that transparent communication supports both corporate and community-level sustainability outcomes. Community engagement involves listening to community needs, gathering feedback, and forming cooperative partnerships to support shared goals. Engagement takes place through site-level interactions, public hearings and joint activities with stakeholders. Environmental grievances are logged and addressed at site level to ensure that concerns are handled promptly and consistently.

Identified material impacts and risks of MOL Group related to water use are described in the table below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Potential negative impact	Water withdrawal / consumption	MOL Group's operations require substantial volumes of water, which has a potential to contribute to local water stress, particularly in regions with limited availability.	Own operations - Petrochemicals - Refining	- Short term - Medium term - Long term
Potential negative impact	Water use in the downstream value chain	Water use across MOL Group's value chains poses a risk of reduced water availability for local communities and ecosystems. Particularly in the downstream value chain, where certain customer segments, such as petrochemical processors and industrial users contribute to high water demand, which may increase pressure on local water resources.	Downstream value chain	- Short term - Medium term - Long term
Risk	Risk due to water availability	MOL Group's industrial activities depend on a stable and continuous supply of water to support core processes and safety systems. Given that MOL operates in regions where water scarcity is generally limited, the more relevant exposure lies in the reliability of internal water infrastructure rather than in external climate-driven shortages. Ageing systems and limited spare capacity may create potential vulnerabilities during maintenance work, technical failures, or emergency situations. Financial impacts may include unplanned downtime, repair costs, or reduced operational efficiency.	Own operations - Petrochemicals - Refining	- Short term - Medium term - Long term

MOL Group's 2025 double materiality assessment concluded that the topic water use material from both impact and financial perspective: potential negative impacts to contribute to local water stress, particularly in regions with limited availability, while financial risks due to the operations dependency on stable and continuous supply of water to support core processes and safety systems. This chapter describes how these impacts and risks are managed across MOL Group's operations.

Potential impacts on water availability in its downstream value chain are also considered material, since high water demand of certain customer segments, such as petrochemical processors and industrial users may increase pressure on local water resources. MOL Group – as laid out in the *Business Partner Code of Ethics* – expects all of its business partners to comply with its norms related to HSE and to adhere to environmental protection laws and regulations at all times but it has limited ability to influence consumer-related impacts arising from the activities of downstream value chain actors. Consequently, no specific management actions or policies are disclosed for these impacts, as they fall outside MOL Group's operational control.

Due to the discharge of industrial waters back to the environment, the topic water use strongly interconnected with water pollution. Further information can be found in Chapter E2 on Pollution.

## POLICIES RELATED TO WATER USE

/E3-1/

ESRS	Disclosure Requirement E3-1
IFRS	IFRS S2.14(a)(i)

### General policy commitments & management responsibilities

To mitigate water-related impacts and risks, MOL Group has established comprehensive policies and practices that prioritize efficient water use, infrastructure reliability, and proactive risk management. These measures aim to reduce water withdrawal and consumption, minimizing potential contributions to local water stress, while ensuring the stability of internal water systems that support core processes and safety functions.

MOL Group's commitments to environmental protection, including water stewardship, are outlined in the *Group HSE and Social Impact Policy* and the *Health, Safety and Environment Area Book*. The *Group Health, Safety and Environment Vice President* is the process owner of these policies and holds executive responsibility for addressing water-related impacts and risks across MOL Group operations. Board-level oversight and accountability for sustainability, including water stewardship, is provided by the *Sustainable Development Committee* of the Board of Directors.

In developing and implementing these commitments, MOL Group aligns its approach with recognised external frameworks. Best Available Techniques (BAT) documents, industrial best practices and relevant ISO standards are taken into account to ensure that internal requirements reflect up-to-date expectations for responsible water management.

The formulation of policies also incorporates a thorough consideration of stakeholder interests. Inputs are collected at local level and include perspectives from:

- ▶ Employees and internal teams
- ▶ Local communities and residents
- ▶ Regulators and governmental authorities
- ▶ Customers and consumers
- ▶ Suppliers and contractors
- ▶ NGOs, environmental groups, and professional bodies
- ▶ Investors and financial institutions

Each stakeholder group is mapped based on its influence, interest, and potential impact. To understand stakeholder expectations and concerns, MOL Group applies structured engagement methods such as internal team consultations, dedicated communication channels for continuous dialogue, and meetings with regulatory bodies. Feedback is systematically reviewed, analysed, and integrated into policy drafting to ensure that measures address both operational and societal priorities.

In addition, when defining operational requirements, MOL Group ensures that its production processes are aligned with BAT documentation and relevant regulations, thereby minimising water-related environmental impacts and supporting the protection of aquatic ecosystems.

### Water management

Water management is a key part MOL Group's environmental stewardship commitments. Process-based policies related to effluent management are described in section Water protection and efficient use under Element 7: *Environmental Stewardship* of the *HSE MS*:

- ▶ Risk assessments are performed concerning water scarcity, particularly related to climate change impacts based on the AQUEDUCT Water Risk Atlas, or other databased applicable for local operations. Minimization of water consumption and freshwater intake is prioritized, especially in high and extremely high water-stressed areas, with an emphasis on closed systems.
- ▶ Efficient water usage practices are in place, including closed cooling circuits, tank cooling, and pressure tests.

## ACTIONS RELATED TO WATER USE

/E3-2/

ESRS	Disclosure Requirement E3-2
IFRS	IFRS S2.14(a)(i)

In 2025, MOL Group subsidiaries focused their water-related actions on reducing operational water withdrawal and consumption, improving the efficiency of water-intensive technologies, and strengthening the reliability of water-supply and drainage infrastructure.

These efforts were shaped by local water-use profiles—refineries and petrochemicals as high-volume users, logistics and upstream as moderate industrial users, and retail networks as distributed, small-volume users where technology choices strongly influence consumption. MOL Group allocated 2,077 million HUF for surface waters as part of its HSE supervised OpEx, covering the below described operational actions.

Across the Group, several subsidiaries delivered structural reductions in water withdrawal driven by operational changes, efficiency programmes or infrastructure improvements. At Slovnaft, total withdrawal from the Danube decreased by 8%, largely because of stabilised post-turnaround operations, which reduced the need for auxiliary water-intensive activities.

Water-related actions also arose in industrial assets through infrastructure reliability and maintenance, which indirectly reduce water waste by preventing inefficiencies, leaks or unnecessary recirculation. In Upstream Hungary, water-use corrective measures were enacted at sites where operational inconsistencies were identified. Several facilities underwent increased sampling frequency and system cleaning—actions which, although triggered by operational deviations rather than water efficiency per se, are important for maintaining stable internal water circuits and reducing avoidable water inputs caused by process upsets or inefficient recirculation cycles.

At Slovnaft and other refinery-scale assets, water-efficiency actions in 2025 were more limited, but the subsidiaries reported stable or declining water withdrawals due to steady, post-turnaround throughput and reduced need for maintenance-related water uses. Meanwhile, MOL Petrochemicals, which completed major shutdowns in 2025, reduced its water intake in auxiliary units and aligned its internal water-minimisation sub-projects with the Group's broader freshwater-reduction initiative, contributing to more efficient use of industrial water on a site whose needs fluctuate significantly with unit load profiles and maintenance cycles.

Across the retail network, subsidiaries also maintained or increased the frequency of preventive maintenance on water-handling infrastructure, including separator cleaning, reinforcement or renewal of drainage trenches, and insulation works in technical rooms—all of which help avoid unnecessary water loss or uncontrolled infiltration that can inflate consumption figures or reduce efficiencies in local water systems.

In summary, the MOL Group subsidiaries' 2025 water actions centred on reducing water consumption, optimising water-intensive service technologies, improving the reliability of water infrastructure, and strengthening data quality around water use. These actions collectively contribute to MOL Group's long-term water-stewardship commitments by embedding efficient water use, robust operational discipline, and infrastructure reliability across sites with highly diverse consumption profiles.

Regarding future actions, MOL Petrochemicals initiated a project, expected to be implemented in 2026-2027, 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 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. At Danube Refinery, a project was launched aimed at recycling the leachate water generated at the operating units, which will reduce the freshwater consumption of the refinery.

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'.

MOL Group is constantly focused on finding ways to improve the handling methods of water to minimise negative environmental impacts and associated costs and risks. 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 HUF 1 974 million in 2025, 4.7% down from HUF 2 071 million in 2024 (excluding soil and groundwater protection stated in the Actions: Pollution section).

On top of these regular activities, MOL Petrochemical has been progressing with the preparation of a project aimed at enhancing the circularity of water by reusing purified wastewater from its Wastewater Treatment Units, which would otherwise be discharged into River Tisza. The initiative is planned to move into implementation next year. The project aims to optimise water use by utilizing existing pipelines and upgrading manual shut-off valves to motorized ones. Once operational, the initiative is expected to deliver multiple environmental and operational benefits: by recirculating wastewater, it will reduce overall water extraction and minimise the discharge load on the river. Additional advantages include potential energy savings through optimized pump operations and the opportunity to utilize the heat content of purified wastewater to reduce primary energy consumption—particularly natural gas—and chemical use. The project will also support the automation of the firefighting system at MOL Petrochemical by installing motorized assemblies. Although natural surface water remains relatively low-cost today, anticipated future price increases further strengthen the long-term economic case for water reuse. The project is financed through MOL Group's Green Fund, an internal mechanism supporting environmentally focused investments that offer significant benefits while maintaining economic viability.

Following this initiative, the Danube Refinery is also preparing improvements aimed at reducing the use of industrial freshwater at its Make-up Water Unit. The Make-up Water Unit and the refinery's largest cooling water unit operate within the same block, generating hydrocarbon-free wastewater streams from (sand) filter backwashings and blowdown. The current concept is to collect these internally

generated effluents—now directed to the Waste Water Treatment Plant—and recycle them into the feed stream of the Make-up Water Unit. This approach will decrease both the volume of industrial freshwater required and the amount of wastewater needing treatment, contributing to more efficient water management at the site. The project was selected as a MOL Group Green Fund winner in 2024, with implementation planned for next year, supporting the refinery’s broader efforts to strengthen circular water use.

Further information on actions related to water pollution mitigation and wastewater treatment can be found in Section ‘E2-2: Actions and resources related to pollution’.

## TARGETS RELATED TO WATER USE

/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 on the scope of companies under the HSE Management System, which will primarily be driven by improvements at Downstream production sites. The baseline for this target is the average of 74.6 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. The target setting relied on the expertise of internal environmental specialists and reflects stakeholder expectations. The targets are based on established scientific understanding of the environmental drivers relevant to MOL Group, however, they were not derived from a separate, externally validated scientific modelling exercise. In 2025, total freshwater withdrawal reached 82.8 million cubic meters, in line with the general trend described in the Metrics related to water use section. In 2025, MOL Group prepared a list of potential projects that support the achievement of the defined objectives. The prioritization and preparatory work for these projects are currently in progress.

## 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 6.5% from 104.1 million m3 to 110.8 million m3 in 2025. Water withdrawal increased due to refinery activity increases at INA. Similarly, total water discharge is also higher. Total water consumption remained stable.

WATER CONSUMPTION, WITHDRAWAL, AND DISCHARGE	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
<b>Total Water Consumption</b>	<b>th m³</b>	<b>20,992</b>	<b>21,468</b>	<b>21,544</b>	<b>21,541</b>	E3-4_01
<i>o/w in regions with High or Extremely High Baseline Water Stress</i>	<i>%</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	E3-4_02
<b>Total Water Withdrawal</b>	<b>th m³</b>	<b>110,821</b>	<b>110,833</b>	<b>104,094</b>	<b>104,084</b>	E3-4_11
<b>Total Water Discharge</b>	<b>th m³</b>	<b>118,235</b>	<b>118,821</b>	<b>115,634</b>	<b>115,628</b>	E3-4_12

Water-related metrics undergo ISO-based external audits and inspections by the competent authorities, ensuring that the data complies with applicable standards, legal requirements and operational practices.

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, is consumed by humans or incorporated into products.

**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) should be used.

**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, invoices, or are based on best estimation (e.g. the pump's nominal capacity and operating hours).

## BIODIVERSITY AND ECOSYSTEMS

/E4/

### IMPACTS AND RISKS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/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

MOL Group acknowledges that its operations contribute to multiple drivers of biodiversity loss, primarily in the areas of climate change (by emitting greenhouse gas), pollution (by emission of hazardous substances), and land use change during the establishment of new facilities.

Impacts on the natural environment and financial risks stemming from dependencies and negative impacts are monitored and assessed at each relevant site. This includes the assessment of climate change, pollution, water use and waste generation related impacts as laid out in the relevant topical chapters, as well as assessing the impacts on the extent and conditions of ecosystems when establishing new operating areas, which is in the focus of the current chapter. Assessment of impacts related to the upstream and downstream value chains relied on publicly available information from key business partners and external databases, as well as ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

Identified material impacts and risks of MOL Group related to biodiversity and ecosystems are described in the table below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Potential negative impact	Impact on biodiversity due to land use change	Newly established operational sites in or near areas of high environmental value may disturb local ecosystems through habitat fragmentation, potentially affecting species of conservation concern and ecosystem integrity.	Own operations - Exploration & production - Gas transportation	- Short term - Medium term - Long term
Potential negative impact	Impact on biodiversity due to pollution	MOL Group operations, especially in or near areas of high environmental value can potentially lead to release of air, soil or water pollutants negatively affecting the health of ecosystems.	Own operations - Petrochemicals - Refining	- Short term - Medium term - Long term
Risk	Reputational damage or litigations due to ecosystem degradation	Impacts on sensitive ecosystems—such as land conversion, emissions to water, or operations near protected areas—can trigger increased attention from stakeholders, including NGOs, media, and local communities. Inadequate management of such impacts may lead to reputational harm or litigation, potentially affecting stakeholder trust, delaying projects, or resulting in legal and compensation costs.	Own operations - Petrochemicals - Refining - Gas transportation	- Short term - Medium term - Long term

MOL Group's double materiality assessment conducted in 2025 concluded that the company's operations has material impact on the extent and condition of ecosystems due to pollution and land-use change when establishing new sites – former in case of the oil exploration and production and gas transportation activities, latter in case of the refining and petrochemical production activities being the largest emitters across MOL Group's operations. Potential reputational damage or litigation potentially arising from such matters is considered a financial risk. No risks exceeding the Group's financial materiality threshold stemming from dependencies related to biodiversity and ecosystem services, or opportunities related to biodiversity has been identified. 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, impacts and dependencies on ecosystem services).

This chapter focuses on outlining MOL Group's policies, actions, targets, and indicators related to monitoring and mitigating the negative impacts of own operations on ecosystems due to land use changes when establishing new sites (particularly in case of exploration and production activities) as well as potential effect on biodiversity due to pollution (particularly in case of refining and petrochemical activities). Biodiversity has strong interconnections with other environmental topic, such as climate change and pollution. Further information can be found in Chapters E1 and E2.

Although impacts in the upstream and downstream value chain were not assessed as material in the double materiality assessment, biodiversity-related considerations in the value chain are indirectly addressed through existing procurement and supplier governance mechanisms. MOL Group requires suppliers to comply with applicable environmental legislation and permit requirements, as reflected in its *Supplier Code of Conduct* and related due diligence processes.

### POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-2/

#### General policy commitments & management responsibilities

To mitigate biodiversity-related impacts, MOL Group has established comprehensive policies and practices that prioritize ecosystem protection, responsible land use, and proactive risk management. These measures aim to minimize habitat fragmentation and disturbance in areas of high environmental value particularly during the development of new exploration and production sites, and gas transmission

infrastructure. The approach also addresses potential pollution impacts on ecosystems near major refining and petrochemical sites by implementing strict environmental controls, monitoring programs, and remediation plans.

MOL Group's commitments to environmental protection, including biodiversity conservation, are outlined in the *Group HSE and Social Impact Policy* and the *Health, Safety and Environment Area Book*. The *Group Health, Safety and Environment Vice President* is the process owner of these policies and holds executive responsibility for addressing biodiversity-related impacts across MOL Group operations. Board-level oversight and accountability for sustainability, including biodiversity issues, is provided by the *Sustainable Development Committee* of the Board of Directors.

Although MOL Group does not operate a dedicated biodiversity-specific traceability policy covering products, components or raw materials across the value chain, biodiversity-related considerations -including deforestation- are indirectly addressed through existing procurement and supplier governance mechanisms. Supplier requirements include compliance with applicable environmental legislation and permitting conditions, as reflected in the *Supplier Code of Conduct* and related due diligence processes. These governance mechanisms support transparency and oversight of environmental compliance across the value chain, including aspects that may have actual or potential impacts on biodiversity and ecosystems.

*Section 8. Biodiversity* under *Element 7: Environmental stewardship* of the *HSE MS* requires all operated companies to regularly conduct biodiversity impact assessments and to design and implement biodiversity action plans 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. The document is applicable for owned, leased, or sold sites and facilities where the liability has been retained. The process description requires the processes described below (points 1-4.).

### 1. Site assessment, hazard mapping and ranking

Operated companies 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.

### 2. 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:

- ▶ Actions to be implemented for each ranked site.
- ▶ The required timeline for the remediation action plan is 12 years. Remediation actions are scheduled and actions are identified at all high risk category sites. The businesses concerned are liable for tasks described in the relevant laws, regulations, and statutory resolutions.
- ▶ 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 are covered by provisions. Environmental obligations 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 relevant at the site.

### 3. Project implementation

For the management of sites under remediation, the principles of Risk-Based Corrective Action is 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 are considered. The works may vary from simple risk mitigation measures to large-scale site remediation. The following corrective measures might be used:

- ▶ Traditional remediation techniques that can reduce the concentrations of contaminants;
- ▶ Exposure pathway elimination methods, such as capping and hydraulic containment;
- ▶ Land-use restrictions (administrative and institutional controls - these are especially important at larger facilities);

- ▶ Monitoring of natural attenuation between sources and receptors (for the purpose of validating the decision to take no further action).

#### 4. Aftercare activities

After implementing the corrective actions, a site monitoring system is put in place, as part of the corrective action assurance process. The monitoring phase can include a wide range of activities, including quality and quantity control of the given medium; photo-monitoring and data-based monitoring.

#### Policies dedicated to protection of seas

MOL Group has adopted policies and practices dedicated to protect sea ecosystems as well, governing the prevention of marine pollution, protection of coastal waters, preparedness and response to accidental releases, and the safe operation of offshore installations. These policies apply to INA's offshore production facilities, onshore refinery complexes in Rijeka, and related terminals (Solin, Sveti Kajo, Kaštel Sućurac), since other MOL Group subsidiaries do not have major operations in the proximity of seas or oceans.

### 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 *Health, Safety and Environment Management System (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.

In 2025, MOL Group's biodiversity-relevant actions were executed locally by subsidiaries whose operating footprints interface with protected areas, Natura 2000 sites and biodiversity-rich mosaics. While the exact ecological contexts vary, the action patterns were consistent:

- ▶ Preventing releases,
- ▶ Maintaining or upgrading containment systems that protect soils and groundwater,
- ▶ Progressing time-bound remediation where legacies or incidents could propagate into surrounding habitats.

These actions were embedded in day-to-day operations across upstream fields and gathering systems, refineries/petrochemical complexes, logistics pipelines and retail estates. Specific actions relating the mitigation of biodiversity-loss drivers due to pollution are detailed in the relevant topical chapter, E2 - Pollution.

Newly established operational sites can affect biodiversity due to land-use change, habitat fragmentation, and disturbances to local ecosystems. When establishing new sites - particularly in Upstream activities - MOL Group conducts assessments and prepares action plans to minimise these negative impacts.

#### Resources allocated to biodiversity actions

The primary approach of MOL-group towards the protection of ecosystems and mitigation of negative impact on and risks related to biodiversity is reducing the environmental effect of operations, focusing on reducing air, soil and groundwater pollution; reducing the water intake; and minimising the disturbance (such as noise and light pollution) on wildlife. Therefore, financial resources allocated to biodiversity protection are not separately accounted from pollution, water stewardship and other environmental protection expenses. The operational expenditures allocated for these topics are available in the respective chapters (Pollution, Water Stewardship, Resource Use & Circular Economy) of this report. MOL Group has not implemented any biodiversity offsets in 2025.

### TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-4/

MOL Group has currently not adopted any targets on measurable biodiversity indicators. However, 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. Further information can be found in the Targets sections of Chapters E1, E2 and E3.

## METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS

/E4-5/

The table below showcases sites in or near protected areas in 2025, covered by HSE Management System:

SITES IN OR NEAR PROTECTED AREAS IN 2025	Number of sites	ESRS
Upstream	43	E4-5_01; E4-5_02
Downstream Production	3	E4-5_01; E4-5_02
Retail and Logistics	203	E4-5_01; E4-5_02

Upstream activities have the biggest area covered in protected and biodiversity rich areas. Exploration and Production activities have potential negatively affecting biodiversity due to temporal land-use change. Downstream Production sites with oil refining and petrochemical production activities have potential negative impact on biodiversity due to the release of air, soil or water pollutants. In 2025, the following protected areas were affected by these potential negative impact on biodiversity:

Country	Activities	Affected protected areas
Hungary	Exploration & production (20 production fields)	Hortobágy National Park Körös-Maros National Park Őrség National Park Balaton Uplands National Park Duna-Dráva National Park Duna-Ipoly National Park Kiskunság National Park Bükk National Park Natura 2000 sites
	Refining (Danube Refinery)	No national park is in proximity; however, the wetlands of the River Danube in the direct vicinity of the facility are designated as Natura 2000 sites.
	Petrochemical production (Tiszaújváros)	No national park is in proximity; however, the wetlands of the River Tisza in the direct vicinity of the facility are designated as Natura 2000 sites.
Croatia	Exploration & production (22 onshore production fields)	Regional Park Mura-Drava Special Reserve Đurđevački Pesci and Crni Jarki Nature Park Lonjsko Polje Žutica Forest Natura 2000 sites
	Refining (Rijeka Refinery)	No directly affected protected area (within 500 meters).
Slovakia	Refining & petrochemical production (Bratislava Refinery)	No national park is in proximity; however, the wetlands of the River Danube in the direct vicinity of the facility are designated as Natura 2000 sites.
Pakistan	Exploration & production (1 production field)	Kohat Darwazai Banda Game Reserve Kohat Marchungi Game Reserve Kohat Dhoda Paya Game Reserve Dhand Eidal Khel

### Definitions

*Biodiversity-sensitive areas* include:

- ▶ Protected areas: Legally defined area that is designated, regulated, or managed to achieve specific conservation objectives
- ▶ Natura 2000 territories
- ▶ High biodiversity value: areas not subject to legal protection but recognized for important biodiversity features by a number of governmental and non-governmental organizations (communicated through MOL Group's grievance management system).
- ▶ Habitats that are a priority for conservation (often defined in National Biodiversity Strategies and Action Plans prepared under the Convention on Biological Diversity).

*Sites in or adjacent to biodiversity-sensitive areas:* Operational sites, including wells operated by MOL Group that fall under the *HSE Management System* in the reporting period which are in or within 500 meters from biodiversity-sensitive areas (except for standalone pipelines and third party areas); or if an Environmental Impact Assessment determines the site to have critical or significant impact on biodiversity regardless of its proximity to protected area.

*Critical or 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.

#### **Methodology, assumptions and limitations**

The metric “*Sites in or near protected areas*” is compiled based on internal site inventories maintained under the HSE Management System and geographic screening against publicly available national and international protected area databases (including Natura 2000 and national protected area registries). Site coordinates are overlaid with protected area boundaries using geographic information system (GIS) tools.

The 500-meter proximity criterion is applied consistently across the Group to identify sites adjacent to biodiversity-sensitive areas. In addition, where Environmental Impact Assessments (EIA) identify critical or significant biodiversity impacts irrespective of proximity, such sites are included in the scope of the metric.

Key assumptions underlying the metric include completeness and accuracy of internal site location data; accuracy and update frequency of publicly available protected area boundary datasets; consistent interpretation of biodiversity-sensitive area definitions across jurisdictions.

Limitations of the methodology include potential differences in national classification systems of protected areas, time lags in updating external databases, and the fact that proximity-based screening does not automatically imply actual biodiversity impact, which is assessed separately through site-level environmental assessments.

#### **External validation of the metric**

The identification of sites in or near protected areas is subject to internal controls within the HSE Management System. Where required by national regulation, site-level environmental impact assessments and permitting processes are reviewed by competent authorities.

No separate external validation of the biodiversity proximity metric is performed beyond regulatory oversight and the independent sustainability assurance process.

## RESOURCE USE AND CIRCULAR ECONOMY

/E5/

### MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

/E5-1/

MOL Group's business model and operations depend on a complex set of resources and generate various waste streams, as detailed in Chapter ESRS 2 SMB-3. Key material flows across business segments include:

- ▶ **Exploration & Production** activity relies on subsurface oil and gas reserves to produce crude oil and natural gas. During operations, significant waste and byproducts are generated, including drill cuttings, used drilling fluids, produced water, and oily sludge.
- ▶ The **Downstream segment** uses crude oil and naphtha as primary resource inflows to manufacture refined fuels and petrochemical products. Typical waste streams include refinery sludge, spent catalysts as well as wastewater.
- ▶ The **Circular Economy Services segment's** operations include the processing of municipal and industrial waste streams, as well as packaging waste collected through the DRS network. These activities support the recovery of economic value from waste by producing secondary raw materials and energy carriers, as well as minimising the environmental impacts of waste through stringent waste-handling practices, preventing hazardous materials and harmful substances from entering the environment.
- ▶ The **Consumer Services segment** commercialises fuels supplied primarily from refining operations, as well as goods for food and convenience retail. Waste streams primarily include packaging waste, food waste, and used oils generated across its service station network and mobility services.

The sourcing of these input materials and the management of associated waste are inherently linked to environmental impacts and financial risks. At the same time, MOL Group's strategy focuses on reducing reliance on virgin materials and accelerating the transition to a low-carbon, circular economy—creating significant opportunities for sustainable growth.

Environmental impacts and financial risks related to waste and circular economy are monitored and assessed by each relevant business segment, and at each relevant site, based on measurement of the generated, treated, disposed and handled waste and following strict protocols related to waste management. Local inputs are channelled into the Group-level risk management processes and the double materiality assessment. Assessment of impacts related to the upstream and downstream value chains relied on publicly available information from key business partners and external databases, as well as ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

Identified material impacts and risks of MOL Group related to resource use and circular economy (including waste) are described in the table below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Recycling & circular economy practices	MOL Group is expanding its role in the circular economy by investing in waste management and recycling solutions. By converting waste streams into valuable products such as fuels, chemicals, and plastics, MOL Group contributes to reducing pollution from waste disposal, lowering the demand for virgin raw materials, and supporting EU and national targets for recycling and circularity.	Own operations <ul style="list-style-type: none"> <li>- Consumer Services</li> <li>- Circular Economy Services</li> </ul>	- Short term - Medium term - Long term
Actual negative impact	Waste generation	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.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Petrochemicals</li> <li>- Refining</li> <li>- Consumer Services</li> <li>- Circular Economy Services</li> <li>- Gas transportation</li> </ul>	- Short term - Medium term - Long term
Actual negative impact	Impact of waste and packaging in the downstream value chain	Waste generation and packaging-related impacts are material across MOL Group's downstream value chains. Improper handling of plastic byproducts and packaging waste may lead to environmental pollution, including leakage of plastic materials into ecosystems, particularly in the case of customers buying and processing petrochemical products, and in case of convenience goods sold at fuel stations.	Downstream value chain	- Short term - Medium term - Long term
Actual negative impact	Depletion of resources	MOL Group's business model contributes to the depletion of resources, primarily oil and gas. Extraction leads to environmental degradation and increased competition for essential materials.	Own operations <ul style="list-style-type: none"> <li>- Exploration &amp; production</li> <li>- Refining</li> </ul>	- Long term



IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Potential negative impact	Environmental impacts of raw material use in the downstream value chain	Sourcing of raw materials, primarily crude oil and natural gas, have significant environmental impacts across MOL Group's value chains. In the downstream value chain, refining and petrochemical production and conversion of these raw materials into fuels, polymers and specialty chemicals drive resource depletion and generate substantial emissions, reinforcing the need for circular feedstocks and efficiency improvements.	Downstream value chain	- Short term - Medium term - Long term
Risk	Depletion of natural resources	Long-term business viability in upstream operations depends on the ability to sustain hydrocarbon production through effective reserve replacement. Steeper-than-expected production decline, unexpected reservoir behaviour, or lower field performance may result in insufficient reserve replenishment. This could lead to unplanned revenue loss, reduced future cash flows, and lower asset utilisation. The financial impact may manifest in declining production volumes, impairment of exploration assets, and constrained investment planning.	Own operations - Exploration & production - Refining	- Long term
Risk	Waste handling and recycling capacity bottlenecks	Operational bottlenecks in waste treatment, recycling, or transport—caused by infrastructure limitations, subcontractor issues, or market shortages—may lead to inefficient waste flows, feedstock unavailability, service delays and increase the risk of environmental or social harm. These issues can result in higher operational and logistics costs, lost revenue from disrupted material flows, and potential financial liabilities from fines, remediation efforts, or reputational damage.	Own operations - Exploration & production - Petrochemicals - Refining - Consumer Services - Circular Economy Services	- Short term - Medium term
Risk	Regulatory risk from circular economy legislation	Evolving EU and national regulations on waste management—such as recycled content targets or extended producer responsibility (EPR) schemes—are increasing compliance requirements across sectors. Failure to meet these obligations may result in financial penalties, restricted market access, or reputational damage.	Own operations - Consumer Services - Circular Economy Services	- Short term - Medium term - Long term
Opportunity	Waste-based fuel usage & production	Utilizing waste as a feedstock for the production of or co-processing with fuel products can help reduce reliance on conventional resources and lower carbon emissions thereby supporting business viability.	Own operations - Refining	- Short term - Medium term - Long term
Opportunity	Sustainable aviation fuel	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.	Own operations - Refining	- Short term - Medium term - Long term
Opportunity	Biogas production	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	Own operations - Refining	- Short term - Medium term - Long term
Opportunity	Sustainable chemicals	Sustainable chemicals offer a pathway to reduce dependence on fossil fuels by shifting production toward materials with lower carbon intensity and circular use potential. They can be produced from recycled feedstocks, generate fewer emissions across their lifecycle, and often enable downstream recycling. This opportunity supports the transition to a low-carbon, circular economy while diversifying business models away from fuel-based revenue streams.	Own operations - Petrochemicals	- Short term - Medium term - Long term
Opportunity	Waste management services	Integrating municipal waste management and recycling into refining and petrochemical operations enables the conversion of waste into valuable feedstock while supporting the circular economy. This creates financial value through new revenue streams, improved resource efficiency, and enhanced resilience via secure feedstock supply and reduced material costs.	Own operations - Circular Economy Services	- Short term - Medium term - Long term

As a conclusion, resources inflows, resource use, resources outflows and waste topics are considered material from both impact and financial perspective. MOL Group is involved in various different operations and value chains which use different resources and need different approaches to manage impacts, risks and opportunities. Therefore, the remainder of this chapter is divided into three sub-chapters which cover connected, but 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 and petrochemical production), 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.

Each sub-chapter details the policies, action, targets and metrics on outlining how these IROs are managed by MOL Group. 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. Further information can be found in the respective chapters:

- ▶ Green hydrogen production (Chapter E1)
- ▶ Scope 3 GHG emission of products in the value chain (Chapter E1)
- ▶ Supply chain disruption: unavailability of critical raw materials (Chapter G1)

## SUB-CHAPTER A: HANDLING OF OWN WASTE

E5/

### POLICIES RELATED TO WASTE GENERATION AND TREATMENT

/E5-1/

#### General policy commitments & management responsibilities

To mitigate impacts and risks related to waste streams generated during its activities, MOL Group has established comprehensive policies and practices that prioritize waste reduction, safe handling of hazardous materials, and efficient resource recovery aiming to minimize environmental harm near disposal and landfilling sites while avoiding financial liabilities from unplanned costs, remediation efforts, or reputational damage.

MOL Group's commitments to environmental protection, including responsible resource use, waste management, and water stewardship, are outlined in the *Group HSE and Social Impact Policy* and the *Health, Safety and Environment Area Book*. The *Group HSE Vice President* is the process owner of these policies and holds executive responsibility for addressing waste-related and water-related impacts and risks across MOL Group operations. Board-level oversight and accountability for sustainability, including resource efficiency, waste management, and water stewardship, is provided by the *Sustainable Development Committee* of the Board of Directors.

#### Waste handling

Waste handling is a key element in MOL Group's environmental stewardship policies. Relevant process-based regulations are outlined in section 5. *Waste* under *Element 7: Environmental Stewardship* 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 to the use of 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

In 2025, MOL Group subsidiaries concentrated own-waste actions on three practical levers: (1) compliant, high-tempo handling of operational and incident-related waste streams; (2) expansion and tightening of selective collection and segregation to improve recovery quality; and (3) upgrades to methods, infrastructure and reporting that reduce disposal dependence and raise data fidelity. These levers were applied differently across refining/petrochemicals, logistics pipelines and the retail network, reflecting each segment's waste profile and risk points.

In Slovakia, Slovnaft expanded separate collection in its retail footprint (10% of the network in 2025) with a plan to roll out further. The retail separate-collection expansion gradually raises recovery potential and lowers mixed-waste dependence across a growing service-network base. The refinery-side waste trends moved with project cadence (e.g., sludge-pit cleaning and investments).

Within MOL Petrochemicals (MPC), the subsidiary maintained strict segregation across complex streams and integrated new categories related to Polyol trial operations. 2025 actions focused on selective-collection control, waste-type qualification and on-site logistics around shutdowns to prevent mixing and preserve recyclability. By consolidating housekeeping, labelling and bay-level handling, MOL Petrochemicals sought to keep recovery ratios stable despite atypical year-on-year variations in project and maintenance waste.

At INA, own-waste actions reflected a broad industrial footprint: reduced waste in several sub-segments (Upstream, retail, Sisak) due to fewer cleanings and remediation cycles; continued segregation improvements, plastic-reduction in packaging, and enlarged used cooking-oil collection; and ongoing tank upgrades that lower contaminated-waste generation during mandatory integrity works. The directional signal is that operational stability and targeted upgrades are now translating into lower waste creation in parts of the Croatian portfolio.

At the Danube Refinery, own-waste movements were shaped by turnarounds and investments: at Százhalombatta, low mechanical availability of the hazardous-waste incinerator led to temporary external routing—a compliance-driven decision that avoided accumulation on site.

Upstream Hungary reported a 36.7% increase in total waste versus 2024, driven by well operations, tank cleanings, pipeline leaks, site disposals and site closures; critically, nearly 90% of the treated waste was recycled. In other words, the action focus was routing and recovery under unusual activity intensity: keeping high recycling ratios while managing operationally driven waste peaks—especially important in fields where integrity programmes are accelerating.

What ties these subsidiary actions together is a pragmatic, site-led approach: treat incident-driven waste fast and compliantly; design out mixing and improve segregation during reconstructions or shutdowns; keep recovery ratios high even when activity spikes; and stabilise disposal routing when in-house capacity fluctuates. Alongside these, methodological upgrades strengthen traceability and reduce under-reporting of municipal/packaging categories across the service-station estate. Taken together, the actions lower disposal dependence, improve the purity of recyclable streams, and shorten the time from generation to compliant treatment.

#### Resources allocated to waste handling

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 (considering companies under the HSE MS) in 2025 were 8,742 million HUF, 61% more compared to HUF 5442 million in 2024.

Besides the above listed regular operative measures, MOL Group regularly implements 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. Further information on relevant actions can be found in Chapter 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 Circular Economy Services. Regarding handling of own waste, MOL Group's approach is ensuring compliance with all Best Available Technology requirements. Other targets related to mitigating the environmental impacts of waste and enhancing recycling and circular economy practices are currently set at site or company level taking local circumstances into consideration, and are currently not published.

### 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 significantly for both accounting categories. Total waste generated under the consolidated accounting group increased by 160% due to the inclusion Circular Economic Services segment into the data collection process which contributes significantly through waste management facilities to the total. Regarding HSE MS integrated entities, total waste generated increased due to three reasons: increased amount of municipal waste generated at retail stations, higher waste amounts from exploration activities, and from excavated soil from contaminated sites. Detailed information on generated waste, end-of-life of waste, and composition of waste is available in the below tables.

WASTE GENERATED	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
Total waste generated	tonnes	235,386	467,663	175,002	176,779	E5-5_07
Non-recycled waste	tonnes	116,441	241,251	78,015	78,511	E5-5_10

WASTE GENERATED	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies
Percentage of non-recycled waste	%	49	52	45	44
<b>Total hazardous waste</b>	<b>tonnes</b>	<b>86,432</b>	<b>101,863</b>	<b>76,057</b>	<b>76,258</b>
<b>Total waste diverted from disposal by recovery operation</b>	<b>tonnes</b>	<b>120,296</b>	<b>214,763</b>	<b>113,177</b>	<b>114,458</b>
<b>Hazardous waste</b>	<b>tonnes</b>	<b>37,023</b>	<b>39,270</b>	<b>33,379</b>	<b>33,446</b>
Preparation for reuse	tonnes	1,709	1,836	9,175	9,201
Recycling	tonnes	32,979	35,044	22,471	22,471
Other recovery options	tonnes	2,335	2,390	1,733	1,775
<b>Non-hazardous waste</b>	<b>tonnes</b>	<b>83,272</b>	<b>175,493</b>	<b>79,798</b>	<b>81,012</b>
Preparation for reuse	tonnes	3,865	5,086	15,967	17,181
Recycling	tonnes	69,205	157,568	59,338	59,411
Other recovery options	tonnes	10,202	12,771	4,419	4,419

ESRS
E5-5_10
E5-5_15
E5-5_08
E5-5_08
E5-5_08
E5-5_08
E5-5_08
E5-5_08
E5-5_08
E5-5_08

WASTE BY DISPOSAL	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies
<b>Total waste directed to disposal by disposal operation</b>	<b>tonnes</b>	<b>116,441</b>	<b>241,251</b>	<b>78,015</b>	<b>78,511</b>
<b>Hazardous waste</b>	<b>tonnes</b>	<b>49,409</b>	<b>62,593</b>	<b>42,678</b>	<b>42,812</b>
Incineration (with energy recovery)	tonnes	6,177	6,185	7,070	7,070
Incineration (without energy recovery)	tonnes	6,613	6,663	3,907	3,921
Landfilling	tonnes	5,053	13,047	2,674	2,696
Other disposal operations	tonnes	31,566	36,698	29,027	29,124
<b>Non-hazardous waste</b>	<b>tonnes</b>	<b>67,032</b>	<b>178,659</b>	<b>35,337</b>	<b>35,700</b>
Incineration (with energy recovery)	tonnes	10,918	10,945	3,497	3,497
Incineration (without energy recovery)	tonnes	49	49	30	30
Landfilling	tonnes	44,985	123,940	22,738	23,095
Other disposal operations	tonnes	11,080	43,725	9,073	9,078

ESRS
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09
E5-5_09

WASTE BY COMPOSITION	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies
<b>Wastes resulting from exploration, mining, quarrying, and physical and chemical treatment of minerals (EWC 01)</b>	<b>tonnes</b>	<b>27,477</b>	<b>27,101</b>	<b>16,698</b>	<b>16,698</b>
Waste diverted from disposal / waste prevented	tonnes	12,361	11,985	9,649	9,649
Waste directed to disposal	tonnes	16,551	16,552	11,120	11,120
<b>Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing (EWC 02)</b>	<b>tonnes</b>	<b>106</b>	<b>106</b>	<b>67</b>	<b>67</b>
Waste diverted from disposal / waste prevented	tonnes	26	26	20	20
Waste directed to disposal	tonnes	67	67	47	47
<b>Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard (EWC 03)</b>	<b>tonnes</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Waste diverted from disposal / waste prevented	tonnes	0	0	0	0
Waste directed to disposal	tonnes	0	0	0	0
<b>Wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal (EWC 05)</b>	<b>tonnes</b>	<b>9,036</b>	<b>9,098</b>	<b>8,367</b>	<b>8,434</b>
Waste diverted from disposal / waste prevented	tonnes	1,343	1,402	1,165	1,232
Waste directed to disposal	tonnes	7,656	7,659	7,469	7,469
<b>Wastes from inorganic chemical processes (EWC 06)</b>	<b>tonnes</b>	<b>281</b>	<b>287</b>	<b>207</b>	<b>207</b>
Waste diverted from disposal / waste prevented	tonnes	0	6	125	125
Waste directed to disposal	tonnes	281	281	82	82
<b>Wastes from organic chemical processes (EWC 07)</b>	<b>tonnes</b>	<b>768</b>	<b>768</b>	<b>552</b>	<b>552</b>
Waste diverted from disposal / waste prevented	tonnes	3	14	0	0
Waste directed to disposal	tonnes	736	736	549	549
<b>Wastes from the manufacture, formulation, supply and use (mfsu) of coatings (paints, varnishes and</b>	<b>tonnes</b>	<b>5</b>	<b>5</b>	<b>68</b>	<b>68</b>

ESRS
E5-5_12
E5-5_12
E5-5_12
E5-5_12
E5-5_12
E5-5_12

WASTE BY COMPOSITION	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
<b>vitreous enamels), adhesives, sealants and printing inks (EWC 08)</b>						
<i>Waste diverted from disposal / waste prevented</i>	tonnes	0	0	2	2	
<i>Waste directed to disposal</i>	tonnes	4	5	66	66	
<b>Wastes from the photographic industry (EWC 09)</b>	tonnes	1	1	1	1	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	0	0	0	0	
<i>Waste directed to disposal</i>	tonnes	1	1	1	1	
<b>Wastes from thermal processes (EWC 10)</b>	tonnes	234	234	201	201	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	1	1	1	1	
<i>Waste directed to disposal</i>	tonnes	233	233	200	200	
<b>Wastes from chemical surface treatment and coating of metals and other materials; non-ferrous hydrometallurgy (EWC 11)</b>	tonnes	17	17	21	21	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	0	0	0	0	
<i>Waste directed to disposal</i>	tonnes	17	17	21	21	
<b>Wastes from shaping and physical and mechanical surface treatment of metals and plastics (EWC 12)</b>	tonnes	562	572	315	315	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	244	254	156	156	
<i>Waste directed to disposal</i>	tonnes	318	318	159	159	
<b>Oil wastes and wastes of liquid fuels (except edible oils, and those in chapters 05, 12 and 19) (EWC 13)</b>	tonnes	17,121	17,384	18,049	18,110	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	6,998	7,231	7,786	7 847	
<i>Waste directed to disposal</i>	tonnes	10,173	10,204	10,195	10,195	
<b>Waste organic solvents, refrigerants and propellants (except 07 and 08) (EWC 14)</b>	tonnes	74	76	154	154	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	1	1	6	6	
<i>Waste directed to disposal</i>	tonnes	86	88	148	148	
<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified (EWC 15)</b>	tonnes	3,218	3,441	4,242	4,439	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	2,162	2,347	2,926	3,112	
<i>Waste directed to disposal</i>	tonnes	1,049	1,086	1,323	1,334	
<b>Wastes not otherwise specified in the list (EWC 16)</b>	tonnes	19,061	19,677	9,145	9,197	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	7,537	8,032	15,555	15,577	
<i>Waste directed to disposal</i>	tonnes	11,470	11,590	4,156	4,186	
<b>Construction and demolition wastes (including excavated soil from contaminated sites) (EWC 17)</b>	tonnes	82,648	83,839	73,806	74,847	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	74,000	75,154	64,289	65,299	
<i>Waste directed to disposal</i>	tonnes	8,698	8,734	10,853	10,884	
<b>Wastes from human or animal health care and/or related research (except kitchen and restaurant wastes not arising from immediate health care) (EWC 18)</b>	tonnes	0	0	0	0	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	0	0	0	0	
<i>Waste directed to disposal</i>	tonnes	0	0	0	0	
<b>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)</b>	tonnes	15,646	244,873	9,106	9,106	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	5,508	97,549	3,037	3,037	
<i>Waste directed to disposal</i>	tonnes	10,086	134,266	6,061	6,061	
<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions (EWC 20)</b>	tonnes	59,132	60,184	34,002	34,363	E5-5_12
<i>Waste diverted from disposal / waste prevented</i>	tonnes	10,112	10,759	8,460	8,463	
<i>Waste directed to disposal</i>	tonnes	49,016	49,417	25,564	25,921	

Requirement for reporting Waste Management metric is described in *Appendix 2b: Reporting Handbook* of the HSE MS. Key reporting principles are listed below:

#### Categories for Waste Management Reporting:

- ▶ Waste generation
- ▶ Waste diverted from disposal
- ▶ Waste disposal
- ▶ Recollected waste
- ▶ Cross border hazardous waste exported and/or imported

#### General Reporting Principles:

- ▶ Quantities are reported as the gross weight of the waste.
- ▶ To provide information about the composition of waste, the European Waste Catalogue is used as the basis for the reporting structure. All waste-related data is reported under the main group codes of the catalogue.
- ▶ All quantities of waste that are generated as a result of MOL Group operations and that is subsequently recovered or disposed by MOL Group or any third party are included in the reported quantities.
- ▶ Each waste output is classified according to its final treatment route (preparation for reuse, recycling, other recovery) following the hierarchy and definitions of the European Waste Framework Directive, based on the actual mass handed over to the respective treatment operation. Where a waste stream undergoes multiple steps only material under the final recovery operation is reported to prevent the same material being double counted. Internal transfers between sites are excluded from recovery totals to avoid duplication.
- ▶ Wastewater discharged to water treatment plants is not reported as waste but according to the recommended Practice Water Reporting. Aqueous waste/wastewater stored in tanks on site/off site prior to treatment is not reported as waste.

#### 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 is not available, estimating the weight using available information on waste density and volume collected, mass balances, or similar information.

## SUB-CHAPTER B: RESOURCE USE OF THE DOWNSTREAM SEGMENT

/E5-B/

### POLICIES RELATED TO RESOURCE USE IN THE DOWNSTREAM SEGMENT

/E5-1/

#### General policy commitments & management responsibilities

MOL Group's commitment to sustainable resource use guides its approach to managing risks and leveraging opportunities within the 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 MOL Group's 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 the company's product portfolio, enhancing the sustainability of industrial activities, and integrating circular economy technologies into the core business by transitioning away from virgin resources are key priorities. Enablers of this transition include increased use of secondary (recycled) materials and waste-based feedstocks in production processes and prioritising sustainable sourcing practices to ensure responsible use of renewable resources. Through investments in petrochemicals, biofuels, and biomethane, MOL Group aims 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<sub>2</sub> 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 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 on developing 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.

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. 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 the *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, MOL Group is 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 own operations. The *Product and Asset Portfolio Management framework* defines 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<sup>29</sup>) 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*. 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

<sup>29</sup> 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%.



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.

## ACTIONS RELATED TO RESOURCE USE

/E5-2/

### 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 risks in the crude oil value chain, 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 continuous 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 2025. Diversification efforts also aim to mitigate potential disruptions from interruptions in the Eastern crude supply via the Druzhba pipeline or the Adria supply route. To enhance the potential utilization of the Adriatic pipeline, MOL Group has entered into a partnership with JANA, the pipeline's owner and operator.

### Circularity in chemicals

Chemical recycling aims to convert hard-to-recycle waste plastic to high-value chemical or feedstock by breaking down plastic waste to building blocks that can be processed in the petrochemical facilities to produce polymers, thus closing the loop for circularity. In 2023 MOL Group has partnered with Lummus Technology to establish a facility that utilises Lummus' Green Circle pyrolysis technology to transform plastic waste into high-value petrochemical feedstocks, promoting circularity. Basic engineering design was completed, the planned chemical recycling facility at MOL Petrochemicals Co. Ltd. in Tiszaújváros, Hungary, would process 40,000 tons of mixed waste plastics annually. The plant would be equipped with a fully electric pyrolysis reactor resulting in zero direct scope 1 emissions from the unit during normal operation.

In 2025 MOL Group has successfully completed the first trial production using circular feedstock at its MOL Petrochemicals site in Tiszaújváros, Hungary. The circular naphtha feedstock used in the pilot test was purchased externally, it was produced through chemical recycling from post-consumer mixed plastic waste. Circular feedstock was handled in MOL Petrochemicals according to ISCC PLUS (International Sustainability and Carbon Certification) certified process. This allows MOL to produce circular-based monomers (the smallest building block of plastics) and then convert them into polymers, expanding the product portfolio with chemically recycled polymers.

### 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 700 kilotons of biofuels into its fuel products sold in 9 countries in 2025, saving approximately 2 600 000 tons CO<sub>2</sub> 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 14 kilotons of renewable feedstocks (for example vegetable oil) were co-processed together with fossil materials in 2025, increasing the renewable share of diesel, reducing up to 55 000 tons /year CO<sub>2</sub> 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 successfully implemented its sustainable aviation fuel (SAF) strategy in 2025, ensuring ReFuelEU Aviation compliance across its core countries. By supplying the region through waterway and railway imports, MOL Group ensures that this novel fuel type makes its way into Central Eastern Europe from the Western European hubs, and will continue the supply into 2026, having established reliable and efficient logistics channels. MOL Group has allocated resources to improve related infrastructure as well: storage tanks specifically for SAF distribution has been put into operation, which now both provides flexible logistic options and increases supply security of the region. MOL Group will continue its efforts and work on projects aimed at preparing for the 2030's regime when ReFuelEU Aviation obligations will increase from the current 2% to up to 6%.

### Biogas and biomethane

MOL Group is advancing its position in the biogas value chain with the ambition to become a regional leader by 2030. Biogas production contributes to CO<sub>2</sub> 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.

Since acquiring its first biogas plant near Szarvas in 2023, MOL Group has continued to advance its biogas roadmap, building on the operational experience gained. To further scale activities across the biogas value chain, MOL Group has launched an upgrade project, which will enable the site to produce 7.1 million m<sup>3</sup> of biomethane annually and inject it into the local natural gas distribution network by Q4 2026.

Additionally, MOL Group has launched its first greenfield biogas investment in Enying, further expanding its presence in the biomethane value chain. The project involves the construction of a new biogas plant with biomethane purification and direct grid injection capability. The plant is expected to produce approximately 3.4 mn m<sup>3</sup> of biomethane per year. Alongside these projects, MOL Group continues to evaluate additional biogas and biomethane opportunities across the CEE region to support further value chain expansion.

## SUB-CHAPTER C: MANAGEMENT OF IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO CIRCULAR ECONOMY SERVICES

/ES/

### POLICIES RELATED TO CIRCULAR ECONOMY SERVICES

/ES-1/

#### General policy commitments & management responsibilities

For the Circular Economy Segment (hereinafter: CES), 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 Zrt.*

As of the scope of this report, MOHU Zrt. (hereinafter: MOHU) is the primary entity as the concession company. Other subsidiaries under the segment are companies with various ownership structures (e.g., MOHU Budapest Zrt., hereinafter: MOHU BP), some of which, without any operations currently, have been reorganized into another segment at the end of 2025. Segment-level policies apply to all of them, nonetheless. Policies where MOHU is the subject, can also have an indirect effect on other segment entities, on account of how the segment and waste management is organized.

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. 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 accordance with the significance of the EPR system, and with the Government Decree 80/2023. (14 March 2023) on the detailed rules on the operation of the extended producer responsibility system, a separate, MOHU-relevant policy has been adopted. This policy supports the attainment of, and closely relates to the two municipal solid waste targets of the concession. It recognizes the impacts, risks, and opportunities associated with the segment's operations, and highlights relevant key stakeholders, among others, governmental bodies, producers, end consumers, subcontractors. The framework for operation is laid out by EU and national legislation, and emphasizing two key requirements:

- ▶ To reach all relevant producers and persuade them to take part in the scheme in order to ensure reaching the objectives of the system, and
- ▶ To develop the system and adjust quality and environmental goals by managing risks and integrating them into MOHU's daily operations.

In order to achieve MOL Group's Circular Economy objectives, the 4 "R"s 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:

- ▶ For partners, by means of contracting, cooperation and investments, and
- ▶ 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.

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 in first 10 years of concession). 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 (ended in July 2023), a transition period (by the end of 2026), and price regulatory cycles (until the end of 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, ISO 50001 certified [Integrated Management System](#) (available in Hungarian). 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 processes by accepting their feedback. Policies are updated based on reflections to internal and external changes, especially risks, and based on the findings of regular system audits.

## 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:

- ▶ To organize and develop the Hungarian State waste management public task (activities covered by the concession, consisting of two task areas, namely the 'waste management public service tasks' and the 'waste management institutional tasks'), which entails a large-scale stakeholder management responsibility, inter alia, contracting with numerous service providers along the waste value chain.
- ▶ As part of the concession, function as the operating entity of both the extended producer responsibility (EPR) system and deposit refund system (DRS).
- ▶ Advance the development of the Hungarian waste management system towards EU and national targets, by making key investments into assets, relationships with all relevant parties, and the education of corresponding stakeholders.

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 five-year period ending 2029 for the whole of the CES segment, 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.

The overall development plan of the whole waste system, called GFRT (*"rolling development system plan"*), is aligned to reach EU targets by 2040, and 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 mentioned in this report.

### EPR (Extended Producer Responsibility)

The EPR system was launched on 1st July 2023. MOHU, in its 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)

Establishing the DRS system has been one of the main priorities of MOHU since its operation started, and the focus in 2025 was similar – improving the availability, and initiating the optimization of the system, both from a logistical and a material processing perspective, in its first complete year of operation. By means of close cooperation with retail partners, almost 4,600 reverse vending machine units (RVMS) have been procured and installed, available at retail networks, of which are 900 new units in 2025, along with more than 1,700 contracted manual takeback points, approximately 200 more than at the end of the previous year. With its maturation, penetration of the system grew quicker than expected, and reached a more than 88% return ratio, 8 million beverage packaging being returned per day during the year. 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 fixed 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 requires cooperation at the foremost, since reaching an optimum in the system together with producers, retail partners, sorting facilities, and finally, buyers of materials, support the achievement of long-term targets laid down for the whole segment.

### Infrastructure and logistics developments

In a similar approach to the development of the DRS system, the spotlight in 2025 remained on the continued development of the Hungarian waste collection infrastructure. In consequence of improving or creating the infrastructural foundations, and educating key partners and customers, MOHU aims to build a strong momentum supporting the main targets also laid out in this document under Targets.

As part of the waste yard investment and establishment program, the Komárom facility was built and commissioned during 2025. With these (self-owned) wasteyards, the goal is to promote selective waste collection among the population, and create as many separate clean waste streams/categories as possible, which simplifies the waste treatment and increases recycling process efficiency afterwards. The planning of subsequent facilities is currently underway, while the experiences and results of the initial investments are being evaluated, and any necessary adjustments will be implemented based on the outcomes of this assessment.

Development of the textile waste collection infrastructure was further pursued, as almost 1,000 new containers had been ordered, of which 800 have already been installed, bringing the total numbers to more than 2,400 and 1,900, respectively. 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 a series of new waste collection vehicles is in progress, aiming at improving the overall efficiency of the collection of numerous waste streams. In 2025, 124 vehicles were delivered, majority of which have been handed over for partners to enter service. Special vehicles supporting the pilot phase of biological waste collection, and mobile waste yards augmenting the brick-and-mortar waste yard programme have also been procured and begun to operate. 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 asset investments is always aiming to opt for the most efficient solution. MOHU is 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 for the first ten years of the concession. However, MOL intends to dedicate around USD 0.9 bn (HUF ~300-330 bn, depending on actual exchange rates) 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).

Continuing with efforts to identify further synergies within CES segment, and what the best approach is to move towards and align with the identified IROs, MOHU Holding is proceeding with the rationalization of its structure, in order to transform the operations, and exert influence on regional waste management firms.

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 CIRCULAR ECONOMY SERVICES

/E5-3/

Main targets of the segment originate from the **Concession Contract**, and commitments made there. Mainly MOHU is responsible in terms of these indicators, as other subsidiaries with total control are indirectly influenced.

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 move 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 2025, the investment reached 80 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 CIRCULAR ECONOMY SERVICES

/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.

	UNIT OF MEASURE	Target	2025	2024	2023
Ratio of municipal solid waste prepared for reuse or recycling	%	65	N/A	33.8	33.7
Ratio of municipal solid waste landfilled	%	10	N/A	47.3	49.5
Committed CAPEX spending (rolling / cumulative value)	HUF bn (USD mn)	185 (cca. 500)	80 (226)	53 (146)	21 (63)

The target year to reach 65% of municipal solid waste prepared for reuse or recycling is 2035, unless derogation is applied by the EU to postpone the target for 2040. The data for ratio of municipal solid waste prepared for reuse or recycling in 2023 only takes into account the second half of the year since MOHU does not have reliable information on the previous period. The committed CAPEX spending of HUF 185 bn is for the period 2023-2033.

### Methodologies and assumptions:

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 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
    - minus 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
    - except for 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 2025)



## WORKFORCE

/51/

### MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO OWN WORKFORCE AND WORKERS IN THE VALUE CHAINS

MOL Group's operation heavily relies on its over 25,000 employees, as well a large number of contractors, and workers in its upstream and downstream value chains. Managing the various impacts, risks and opportunities related to workers requires different approaches and expertise, therefore they are generally handled in separate policies and actions, measured and monitored by different progress metrics, and therefore, the double materiality assessment also relied on different sources and procedures. In this report, these are categorized into the following three interconnected, yet distinct groups:

- ▶ **Human resource management:** Identification of actual and potential impacts and risks associated with employees – such as wages and hiring, trainings and skills development – is based on continuously collected feedback from our workforce and regular engagement surveys.
- ▶ **Workers' health & safety:** MOL Group's processes for the identification of impacts and risks related to the health and safety of workers is described in *Element 2: Risk & Change Management*, and in *Element 6: Operational and occupational safety of the HSE MS*. 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.
- ▶ **Workers' rights and ethics:** MOL Group operates a robust ethical management system to monitor and prevent negative impacts, such as harassment or discrimination of any kind. MOL Group's exposure to the risk of incidents of human rights abuse such as 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.

Assessment of impacts related to the upstream and downstream value chains relies on registered complaints in MOL Group's whistle-blower system, as well as on publicly available information from key business partners and external databases and ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

In our 2025 double materiality assessment, we identified the following impacts and risks related to workforce:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Inclusive work environment	MOL Group is committed to fostering a fair, inclusive, and respectful work environment by promoting diversity, gender equality and implementing measures to prevent discrimination, violence, and harassment.	Own operations: Group-level	- Short term - Medium term - Long term
Actual positive impact	International mobility	MOL Group enables international mobility within its workforce by offering opportunities for employees to take on new roles across its international subsidiaries, supporting career development, skills transfer, and cultural exchange whilst retaining talent and building long-term organisational capabilities within the Group's integrated structure.	Own operations: Group-level	- Short term - Medium term - Long term
Actual positive impact	Secure employment and social dialogue	Providing stable employment above market trends is a key part of MOL Group's value proposition, contributing positively to the social well-being of its workforce. This commitment is supported by structured social dialogue through employee representation forums, trade unions, and work councils. It reinforces workforce security, mutual trust, and the Group's social license to operate over the long term.	Own operations: Group-level	- Short term - Medium term - Long term
Actual positive impact	Training and skills development	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.	Own operations: Group-level	- Short term - Medium term - Long term
Actual positive impact	Collaboration with academic institutions	MOL Group collaborates with academic institutions through university partnerships, dual education programmes, and internships that support both talent development and long-term career prospects. These initiatives strengthen internal capabilities, contribute to future talent pipelines, and reinforce MOL Group's role in regional education and workforce development.	Own operations: Group-level	- Short term - Medium term - Long term

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Potential negative impact	Hazardous working conditions	Workers may be exposed to physical, chemical, or environmental hazards during activities at MOL Group's sites.	Own operations: - Exploration & production - Petrochemicals - Refining - Circular Economy Services - Midstream	- Short term - Medium term - Long term
Potential negative impact	Potential negative impact on workers' health and safety in the upstream value chain	In the various industrial activities conducted across MOL Group's value chains, employees may be exposed to physical, chemical, or environmental hazards. Potential impacts on health and safety are considered material in case of workers in the upstream value chains.	Upstream value chain	- Short term - Medium term - Long term
Potential negative impact	Operations in areas with low security	MOL Group operates in high-risk areas related to employee safety and asset protection, requiring enhanced safety measures. The company continuously improves its security protocols to safeguard people, operations, and infrastructure.	Own operations - Exploration & production	- Short term - Medium term - Long term
Potential negative impact	Potential negative impact of poor labor standards in the upstream value chain	Poor labor standards among suppliers in MOL Group's suppliers could negatively affect workers' well-being and rights. Potential negative impacts may include unfair employment conditions, inadequate wages, excessive working hours, and limited access to grievance mechanisms. In regions with weaker regulatory frameworks, such practices can lead to violations of fundamental labor rights, making this a potential material impact on workers in the upstream value chain.	Upstream value chain	- Short term - Medium term - Long term
Potential negative impact	Potential negative impact on workers' rights in the upstream and downstream value chain	Workers across MOL Group's value chains can be exposed to risks that undermine fair employment conditions. In the upstream value chain, procurement from regions with weaker labor protections may lead to unfair wages, excessive working hours, restrictions on freedom of association and collective bargaining and limited access to grievance mechanisms; or in extreme cases risk of child labor, forced labor, modern slavery, discrimination shall also be considered. In the downstream value chain, severe violations are unlikely since operations are focused in European countries; however, contractors and logistics partners may face challenges related to unfavorable employment practices.	Upstream and downstream value chain	- Short term - Medium term - Long term
Risk	Attraction and retention of talent	Demographic trends such as an ageing workforce, low interest in technical careers, and emigration are reducing the availability of skilled labour, while changing expectations in the labour market are contributing to increased workforce mobility and fluctuation. These external pressures place growing demands on succession planning, managing internal competition for talent, and strengthening employer branding to remain attractive in a competitive environment. Financial impacts may include increased recruitment costs, productivity loss, and potential delays in project execution.	Own operations - Exploration & production - Petrochemicals - Refining - Consumer Services - Midstream	- Short term - Medium term - Long term
Risk	Lack of workforce skills (inadequate reskilling, retiring & knowledge transfer, new technologies)	The accelerated retirement of experienced staff, combined with the growing need for new skillsets due to acquisitions and digitalisation can create a gap between current workforce capabilities and evolving business requirements. Limited availability of suitable replacements, coupled with insufficient reskilling or knowledge transfer processes, can impair operational performance and adaptability. Financial consequences may include training expenses, reduced efficiency, increasing dependency on third-parties and long-term constraints on innovation or transformation efforts.	Own operations - Exploration & production - Petrochemicals - Refining - Consumer Services - Circular Economy Services	- Long term
Risk	Rising employment costs	High inflation, low unemployment, rising minimum wages, and regional wage alignment pressures are contributing to increasing employment costs across the labour market. In a competitive environment—intensified by cross-border mobility and wage expectations shaped by other industries or collective agreements—companies may struggle to retain staff without continuously raising compensation. Financial impacts may include rising operational expenditure, reduced profitability, and higher turnover-related replacement costs.	Own operations - Exploration & production - Petrochemicals - Refining - Consumer Services - Circular Economy Services	- Short term - Medium term - Long term
Risk	Ineffective social dialogue	Weak or fragmented engagement with employee representatives, work councils, unions, or other workforce stakeholders can lead to misunderstandings, mistrust, or unresolved grievances. This can increase the risk of labour disputes, strikes, or reduced workforce morale. Financial impacts may include operational disruptions, delayed projects, or higher personnel-related costs.	Own operations - Circular Economy Services	- Short term - Medium term - Long term

The remainder of this chapter is divided into three sub-chapters with the aim to describe how MOL Group manages the above listed IROs, outlining specificities of each group:

- **Sub-chapter A** focuses on the impacts on workers, such as wages & hiring, trainings and skills development; and risks related to human resource management, such as employee attraction & retention capabilities. This sub-chapter is focused on MOL Group's own 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 as non-employees (individual contractors and agency workers supplying labour 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 MOL Group's approach towards workers' health and safety. The materiality assessment concluded workers' health and safety as a material topic from impact perspective due to the hazardous working conditions inherent to MOL Group's industrial operation. These potential negative impacts – such as lost time injuries or health impacts can result in operational hindrances and other negative financial consequences for the company – however, the degree of such losses is below the threshold for financial materiality. Therefore, the report focuses on how the potential impacts related to the health and safety of workers are assessed and mitigated. MOL Group has a 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 is considered as 'third party' in our reporting practices. Individuals described as "value chain workers" by ESRS - who aren't considered either 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 occupational health and safety, therefore safety aspects of any third-party individuals are not covered here.
- ▶ **Sub-chapter C** highlights corporate culture and ethical aspects, 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.

MOL Group also acknowledges potential negative impacts associated with the upstream and downstream value chain as mentioned above. Mitigation of such negative impacts is possible through rigorous responsible procurement policies and operating a whistleblower system, as described in Chapters G1 and S1-C of this report. MOL Group – as laid out in the *Business Partner Code of Ethics* – expects all of its business partners to respect human rights during their operations and comply with its ethical norms. This section however focuses on policies, actions, and metrics related to impacts and risks within MOL Group's own operations, where the company has direct leverage.

## SUB-CHAPTER A: 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

## POLICIES AND 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 or the entire workforce, MOL Group has several policies and strategies in place. The key pillars of the updated **Group level People Strategy**:

- ▶ **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 the company offers, cultivating talent and building a culture which retains key people,
- ▶ **Develop:** Helping leaders grow, empowering 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 its business operations by mitigating labour market risks.

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, remuneration, 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 operations):

### 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 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 the job market.

### 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 while attracting top talent 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. Feedback on trainings is collected, and the internal training offerings are continuously updated to adapt to the needs of employees, and enable upskilling and reskilling, including topics such as green and digital transformation. 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.

### 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.

### 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.

Workers' 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 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 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.

The Council was re-elected in 2023 for a five-year mandate. A new framework agreement between MOL Group's management and the EWC is currently under development, with expected signature in 2026, to ensure MOL Group gains structured insight into its workforce's perspectives by establishing formal mechanisms for information-sharing and consultation, requiring the management to inform and engage employee representatives in a timely manner on all major transnational business, organizational, and employment-related decisions. This institutionalized dialogue enables employees' views to be considered during planning and decision-making, supporting more transparent and inclusive workforce engagement across the Group.

Besides engaging with workers' 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 providing 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.

The MOL Group Employee Engagement Survey is usually launched every two years where the engagement level of the workforce can be monitored. Regarding the process, an external vendor, hired by Group Human Resources, provides the questionnaire based on previous years' questions and actualities which is shared in advance with business representatives and top management for review before the launch of the survey. After the 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 the Employee Engagement Survey and its actions, other MOL Group HR processes are aiming to 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.

The agreements with the trade unions and work councils ensure that sufficient resources are allocated for an effective engagement with worker representation. This includes worker representation in the Supervisory Board, and employees who are in liaison with trade unions in all operated companies with more than one thousand employees. From a financial perspective, these agreements ensure adequate remuneration for the responsible employees, as well as predictable and controllable costs for EWC and trade union operations.

## 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 concerns 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. Further information can be found in the Chapter 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 MOL Group's 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.

### Talent Management Framework and Talent Pipeline

Within the talent management framework, the focus is to support our leaders in attracting, identifying, developing, retaining and promoting MOL Group Talents through impactful and efficient processes, using unified Talent Management language and terminology. In 2025, 17% of the total MOL Group population (1,801 employees) were identified as talents, of whom 307 people are in senior expert or managerial roles. These numbers show a similar trend compared to previous years, with a slight decrease, indicating more conscious talent identification by leaders. Talent MNG HUB, a platform serving as a one-stop shop for MOL Group leaders to educate themselves through short e-learning videos and materials, was visited by 180 unique users in the period of December 2025 to January 2026. Overall, 72 People and Talent Discussion sessions were organized as discussion platforms for key people and talents across the MOL Group. 295 stay interviews were registered, which confirmed the 2024 results regarding the main drivers for key people and talents staying in the organization, as well as triggers for leaving. Based on career-focused discussions, 37% (110 people) of the survey sample expressed ambition to transition to a new role, both in the short and long term, while 58 of them indicated ambition toward a leadership career path.

### Talent Development and Leadership Programs

When it comes to talent development, there are many available solutions within MOL Group, e.g. mentoring, coaching, leadership and professional expert development programs. At the end of last year, the Aimy AI-powered coaching program was introduced for a selected group of 150 colleagues, providing scalable, always-on development support fully aligned with business priorities.

Four colleagues started and seven other completed their Corvinus-MSM SEED Executive MBA in 2025, while nine started the Algebra program, thirteen completed the Cotrugli eMBA and five completed the Cotrugli MBA.

In 2025 Harmonized leadership and talent development program participation increased in most programs compared to 2024:

- ▶ **SEED leadership development courses** – 38% increase. 49 talents participated in 2025 vs. 42 participants in 2024 (Foundations of Management Program, Business Leadership Program, Advanced Leadership, Aspiring Women Leaders Program).
- ▶ **First Time Leader of Leaders Program (MOL Hungary)** – 10% increase, with 34 participants in 2025 vs. 31 participants in 2024.
- ▶ **First Time Leader Program** in all core countries and on Group level – 22% increase, with 158 participants in 2025 vs 129 participants in 2024.
- ▶ **Intensity modular development courses** as an integral part of the Group's leadership development portfolio – 4% decrease, attended by 94 colleagues in 2025 vs 119 participants in 2024.
- ▶ **Future Expert Talent Program** in three core countries – 14% increase, with 202 talents starting the program in 2025 vs 175 participants in 2024.
- ▶ In addition, an 8-month Group Finance Talent Program was rolled out, attended by 20 colleagues, preparing them to step up into leadership roles.
- ▶ A continuous leadership learning program was also piloted, targeting the LEAD Alumni community (81 participants) as a 5-month modular academy. The format included 2-hour online sessions with the same group of leaders over the same topics of their interest. The pilot received highly positive ratings (80% average satisfaction rate) and it is planned to be offered to this group of leaders in 2026.

#### Early Career Programs and Education Partnerships

In 2025, 98 fresh graduates from eight countries were hired within Growww framework, reaching a 44% female ratio.

In Hungary, secondary technical education remained a key focus area. The collaboration with the Százhalombatta technical school was further strengthened, and the institution was rebranded under the MOL name (MOL SziSziKI). MOL strategically plans junior engineer and technician recruitment at the partner-institution level and at the individual student level. In Hungary, maintaining — and in some areas strengthening — university partnerships and secondary technical education remains a key priority. In the 2025 university junior engineering pipeline, 55 BSc and MSc dual students were enrolled. Fourteen of them graduated, and 86% joined MOL Group.

In the secondary-school blue-collar pipeline, 2025 brought an important milestone: at the Százhalombatta technical school, *M-wig* was rebranded under the MOL name (MOL SziSziKI), in addition to the four MOL classrooms renovated in 2024. All the four classes for chemical, mechanical and electrical technicians have already started their studies. Altogether, we had 237 secondary technical students, 121 of whom completed their vocational training. Some of them have already started blue-collar positions at MOL Hungary sites, while others continued their studies at MOL-relevant universities.

Through teaching activities at the four MOL university departments and other partner institutions, more than 150 MOL colleagues are dedicated to sharing their knowledge and attracting young talent. As a strategic investor, MOL also plays a role in the operation of the Budapest University of Technology and Economics (BME). Additionally, around 300 university interns complete their internships at MOL and its OpCos each year. Those in their final semester provide a steady talent pipeline for Growww and other junior non-engineering roles.

In Croatia, INA actively collaborated with 12 faculties and 12 vocational schools. Regarding internship, 46 pupils took part in dual internships, 130 students participated in regular internship, and 86 lectures were organised by INA Group experts at the faculties.

Slovnaft collaborated with 3 technologically focused secondary schools. A Memorandum of cooperation with one new school was signed last year. Students have various practical trainings at different sites of the company and at the Slovnaft Training Center. The Training Center is also used for theoretical education of students in the earlier years of study. In the 2025 school year, we had 11 students included in the practical education.

#### Employer Reputation and Social Dialogue

MOL Group's reputation as a leading regional employer was further strengthened through recognition from more than 20 global and local external awards.

MOL Group supports fair treatment practices, including 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 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. Its Executive Committee (EC) meets on a quarterly basis to discuss employment- and operations-related issues. The EWC held two ordinary meetings in 2025 with the participation of the MOL Group senior management. In 2025, the percentage of employees



covered by collective agreements remained high at 86.1%. Trade Unions are active at the majority of MOL Group companies, representing 96.6% of the total headcount. Relevant laws concerning collective agreements differ by country, but most MOL Group companies are covered by such agreements. The focus of negotiations was to ensure higher income for operational and expert employees, either through increases to base salary or through improvements in various material benefits, with optimal allocation of the available budget and the use of any non-taxable opportunities in local markets. Trade unions and MOL Group company representatives continued close cooperation and, through positive social dialogue, defined ways of working that support business continuity and ensure successful and stable operations.

MOL Group continues to prioritize its employee wellbeing strategy, ensuring that all employees can fulfil themselves in all aspects of their lives and achieve a healthy work-life balance. Through internal and external channels, continuous communication campaigns are organized to inform employees about all available benefits, including physical and mental health support, parental support, financial benefits, and professional development opportunities.

MOL Group places special focus on employee health and provides life, accident and travel insurance for every MOL Group employee through its benefits platform. Additionally, in the three core markets (Hungary, Croatia and Slovakia), which together account for ~80% of the total employee population, as well as in most other MOL Group companies, additional healthcare benefits are provided, such as private health coverage and regular annual medical check-ups.

### **Wellbeing, Benefits, and Family Support**

In 2025, the 'Benefits' mobile application was made available to employees in Hungary, Slovakia, and Croatia, providing up-to-date information on all remuneration elements, including wages, cafeteria options, and other benefits. The aim of this initiative is to enhance employees' awareness and understanding of the full range of benefit options available to them.

The focus of the Group's wellbeing strategy also remained on ensuring a high level of maternity and paternity entitlements for employees (noting that maternity/paternity practices and benefits differ among member companies across the Group, as they are defined in compliance with local rules and practices). With a number of benefits supporting parents in caring for their children, MOL Group continues to invest in maintaining its status as a 'family-friendly employer'.

### **Learning and Capability Development**

Recognizing the positive effect of skills development and continuous learning on both employees and organisational success, MOL Group placed strong emphasis on — and allocated significant resources to — training and development activities in 2025.

MOL Group Academy (MGA) continued to grow as the key internal knowledge hub for all MOL Group employees. This internal academy platform offers digital learning opportunities for business, professional, soft-skill and leadership development through e-learning materials, pre-recorded training sessions, internal trainings, workshops and more. Within the MOL Group Academy framework, 84 trainings were organized, covering 49 topics for 2,682 participants, with a total of 11,033 completed learning hours — a 74% increase in training hours and a 42% increase in participant engagement compared to 2024. This growth was mainly driven by an expanded AI & Digitalization training portfolio, delivered through 18 dedicated sessions.

The accelerated focus on Shape Tomorrow Strategy and the rising need for upskilling/reskilling resulted in a 6% increase in average training hours per employee (36.5 in 2025 vs. 34.6 in 2024), along with a 9% decrease in average training costs. This reflects the shift toward group training formats, online formats and license-based platforms (e.g., LinkedIn Learning, DataCamp), which offer a lower cost per participant compared to earlier on-site and more individualized training formats.

In 2024, Exploration & Production discontinued the PetroSkills assessments and launched the revamp of the Technical Competence and Career Development Program (TCCD). In 2025, the new methodology and the SAP SuccessFactors-based system (Talent Intelligence Hub) were introduced, with a pilot in Group Exploration involving 11 managers and 74 colleagues, assessing more than 15 competencies across four seniority levels, with overall positive feedback.

In Downstream, the Growing Professional Skills (GPS) Program used the 2023 assessment results to run calibration sessions, set IDPs and deliver development actions in 2024–2025, followed by a refreshed assessment cycle in Q4 2025 and updated IDPs planned for 2026.

Across MOL Group, around 2,000 white-collar employees in 12 countries participate in TCCD/GPS, supported by more than 400 subject-matter experts, managers and cross-assessors.

### **Digital Learning**

In 2025, the number of microlearning platform (Leon) users among blue-collar employees increased to 7,015 across the entire MOL Group, up from 6,295 in 2024. The growth compared to the previous year was mainly due to 400 new licences requested for INA and 150 new licences for Slovnaft Logistics. Users with access engaged with the platform on an average of 187 days, a slight increase from 182 days in 2024. They also spent an average of approximately 15 hours on various learning activities during the year.

In addition to continued growth in HSE knowledge and company-wide HSE campaigns (such as "It's up to you!"), new professional topics also came to the fore, including PSM, Mobilog and various technical and operational content in the refinery and logistics areas.



After three years from the initial rollout of the digital learning library concept with LinkedIn Learning, a new cycle was launched in July 2025, providing 1,050 employees across MOL Group with a learning licence. Users spent an average of approximately 5 hours per person watching an average of 47 videos throughout 2025, which we consider cost- and time-efficient, while also supporting employees' overall wellbeing by allowing them to access learning content at the most suitable time.

The major topics learned through off-the-shelf digital content included Artificial Intelligence for business, Microsoft Excel, Project Management, Leadership, and a greater focus on Future Skills (adaptability, interpersonal skills, entrepreneurial skills, digitalization).

In addition to LinkedIn Learning, a new online learning platform — DataCamp — was piloted in 2025 to strengthen AI and digital skills across MOL Group. A total of 199 users received two-month access to the platform. Throughout the pilot, participants completed 574 courses, with an average learning time of 4.4 hours per person. The pilot generated highly positive feedback and strong engagement levels. Based on its success, MOL Group is now evaluating the rollout of a similar AI and digital skills development platform for 2026.

Besides the above-mentioned actions, MOL Group implemented several initiatives related to diversity and inclusion. More details can be found 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's 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

EMPLOYEE ENGAGEMENT	2024	2022	2019	2017	2015
Level of sustainable employee engagement	83%	79%	77%	73%	45%

2025 also marked the rollout of Pulse Checks across MOL Group as a new engagement measurement tool, including a Group-level Strategy Pulse Check and several business-requested surveys (Exploration, HR, Finance, Group Strategy, Investment, Audit, MOL AT & DE, MWS, Procurement). We introduced the Downstream MOL Onboarding Survey and created HR Onboarding platform to improve onboarding quality and launched the first-ever Multigenerational Survey to address challenges of four co-existing generations. After analysing more than 7,000 answers, results were shared in December, and follow-up actions will continue throughout 2026. Beyond survey design, support was provided for leaders in interpreting results and defining concrete, actionable steps to enhance employee experience.

## METRICS RELATED TO COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

/S1-8/

MOL Group maintains a robust framework for social dialogue, as reflected in the Collective Bargaining Agreement (CBA), which was concluded between the company and the representative trade unions. The agreement ensures ongoing cooperation and negotiation on a range of employment matters, supporting both the company's operational effectiveness and the protection of employee rights.

Key topics covered by the CBA include:

- ▶ **Collectively Bargained Wages:** The CBA details the wage system, including base salary, wage supplements, performance-based incentives, and other forms of remuneration, all subject to collective bargaining and internal regulations.
- ▶ **Working Hours, Overtime, and Leaves:** The CBA regulates working hours, overtime, rest periods, and various types of leave, including the conditions for extraordinary work, flexible schedules, and the allocation of additional leave in specific cases.
- ▶ **Employee Health and Safety:** The agreement sets out requirements for safe and healthy working conditions, including mandatory use of protective equipment, regular medical examinations, and health promotion programs. It also addresses the employer's obligations regarding occupational health and safety and provides for health-related benefits and support.
- ▶ **Non-discrimination and Equal Treatment:** The agreement explicitly prohibits direct or indirect disadvantageous treatment during the establishment of employment and throughout its duration, mandating equal treatment and corrective action for any violations.
- ▶ **Career Management and Training:** The agreement provides for employee access to information about full-time, part-time, remote, and permanent positions via the internal career portal. It also covers training and education, with the employer bearing the costs for required qualifications and further education under certain conditions.

COLLECTIVE BARGAINING	UNIT OF MEASURE	2025	2024	ESRS
Employees covered by collective bargaining agreements	%	86.1	90.3	S1-8_05
o/w Croatia	%	100.0	100.0	S1-8_05
o/w Hungary	%	84.1	85.2	S1-8_05
o/w Slovakia	%	100.0	100.0	S1-8_05
o/w Other EEA	%	17.4	74.0	S1-8_05
o/w Non-EEA	%	0.0	0.0	S1-8_06

86.1% of employees are covered by collective bargaining agreements. In the EEA, collective bargaining agreements are per company, and coverage is for all employees in the company.

SOCIAL DIALOGUE	UNIT OF MEASURE	2025	2024	ESRS
Employees covered by workers' representatives	%	96.6	96.7	S1-8_05
o/w Croatia	%	100.0	100.0	S1-8_05
o/w Hungary	%	98.7	98.9	S1-8_05
o/w Slovakia	%	100.0	100.0	S1-8_05

96.6% 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).

## METRICS RELATED TO ADEQUATE WAGES

/S1-10/

MOL Group is committed to continuously pay an adequate living wage to all its employees. MOL Group's *Code of Ethics and Business Conduct* states that every stakeholder, including employees have the right to fair wages and a decent living, and the right to an adequate standard of living.

LIVING WAGE BENCHMARKING	UNIT OF MEASURE	2025	2024	ESRS
Employees covered by a living wage benchmarking analysis	%	80.95	N/A	S1-8_05
Employees paid below the adequate wage benchmark	%	0.0	N/A	S1-8_05

MOL Group conducts a living wage benchmarking analysis with the following methodology: The living wage benchmark is based on the local minimum wage set by national law in any given country where MOL Group operates. The local minimum wage is then compared against the minimum monthly gross salary at the reporting company. The analysis covered 80.95% of MOL Group's employees and found that no employees are paid below the applicable benchmark.

## METRICS RELATED TO TRAININGS AND SKILL DEVELOPMENT

Employees receive yearly mandatory trainings on several topics to raise awareness, draw attention to most important matters and risks. Mandatory trainings are based on the employee's tasks and responsibilities, type and location of work.

EMPLOYEES TRAINED ON SPECIFIC ISSUES	UNIT OF MEASURE	2025	2024	ESRS
Employees trained on health, safety and environment issues	%	98.2	N/A	-
Employees trained on discrimination and harassment <sup>30</sup>	%	95	98	-
Employees trained on corruption and bribery <sup>1</sup>	%	95	98	-

In 2025, 98.2% of MOL Group's employees completed their training related to health, safety, and environment issues. 95% of employees received training related to discrimination and harassment, and corruption and bribery, as part of their annual ethics training.

## SUB-CHAPTER B: WORKER HEALTH AND SAFETY MANAGEMENT

### 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

<sup>30</sup> As part of mandatory annual ethics training.

## General commitments

MOL Group has a comprehensive Group-level HSE Management System 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 of 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 occupational health and safety, therefore safety aspects of any third-party individuals are not covered here.

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, such as the ISO 45001:2018, the international standard for Occupational Health and Safety Management Systems. The ISO 45001:2018 coverage of MOL Group (considering the financially consolidated scope) is 51.6%, based on 2025 year-end headcount.

## 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 they always need to comply with local law as well. 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 December 2025) to ensure the continuous improvement, in parallel with industrial best practices. The update 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 feedback round, 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 Element 10: *Incident management* of the *HSE MS* 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 these 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* of the *HSE MS* integrates immediate electronic reporting of incidents through emailing and a tool supporting a thorough incident investigation. For investigating serious incidents, industry standard root-cause analysis methodologies (e.g. 'Tripod', or 'Bow Tie', etc.) are applied. 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. All employees and contractors are encouraged to report all HSE events, even the unsafe conditions and acts potentially leading to those.
- ▶ *Element 3: Competence, Training & Behaviour* of the *HSE MS* requires that everyone understands and exercises Stop Work Authority whenever safety risks are not adequately controlled. This right and responsibility, outlined in *HSE MS* Appendix 6.B II.2.2 and reinforced by Life Saving Rules, empowers all employees and contractors to intervene and stop work if there is any doubt about safety. The principle applies universally across all safety-relevant aspects, ensuring a clear license to say "no" when necessary.
- ▶ Maximum 2 working days after an incident occurred, or in other duly justified cases, the initial consequence classification must be reviewed and modified in the electronic system so that notifications can be sent out if necessary. An Investigation Team Leader must be nominated within 2 working days following the occurrence of an incident by the responsible person. The depth of investigation, selection of method, and involvement of specialists or experts (e.g., authorized fire safety experts) must be determined based on the severity or nature of the incident. Incident investigations must meet relevant statutory legal requirements and be suitable for potential insurance claims or litigation. Investigation reports must be finalized as soon as possible, but within a maximum of 60 calendar days from the time the incident occurred, including all necessary validations in the electronic system.

### 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 such as the *HSE MS*, combined with continuous activity of high quality professional operating staff. MOL Group applies best practices in its local operations which are continuously improved. The general occupational safety activity of safety professionals, occupational health and medical service providers is extended to the following activities:

- ▶ Carry out the fit for duty medical examinations specified in legislation and initiate 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 obligations and details of managing regular and ad-hoc medical check-ups are defined at the highest level in *HSE MS*, Appendix 6 B.I.2.2 – *Fitness for Duty*. Access to these health services, often exceeding MOL Group requirements, is a legal obligation in most countries. Service quality is ensured through rigorous tendering for new contracts, continuous monitoring, and close professional cooperation at both group and local levels to drive improvement based on best industry practices. Providers include subsidiaries of recognized international companies, leading national and local organizations, and specialized health service providers.

### Worker training on occupational health and safety

MOL Group provides regular occupational health and safety trainings for both own workforce and its 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 implemented locally to ensure personnel are qualified, competent, and physically and mentally fit for their roles taking legally required HSE qualifications for specific positions into consideration. Company-level procedures govern HSE competency assessments and training, covering induction content and duration, examination methods, requirements for visitors and temporary staff, practical training where applicable, and refresher training, including recommended annual frequency and topics such as new HSE requirements and lessons learned from incidents.

### 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 to identify the critical gaps to our standards and required level of compliance and set appropriate actions to eliminate them in an acceptable period. By implementing the identified and approved development actions, MOL Group takes a step ahead towards providing healthy workplaces and appropriate health management, including emergency response for all employees. MOL Group health management principles require screenings at least once per 3 years, but preferably annually or biannually to all employees based on a detailed screening protocol, depending on the nature of their work (in case of stricter local legal requirements, compliance with local rules is ensured as well).

Screenings are conducted for known health risks (such as diabetes, cholesterol, calculation of Body Mass Index) followed by individual basic health plan for all our employees. Special workplace health promotion programs are also offered including a variety of medical screenings in different countries/ areas, with different timing (e.g. cardiovascular package, cancer prevention package, musculo-skeletal package, vaccination programs, etc.), 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 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 colleagues travelling to and working in countries with a high risk or incidence of communicable diseases medical screening is conducted before and after travel, and the required vaccinations are supplied 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 for 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 to business relationships

Within MOL Group and the relevant member companies, product stewardship is assigned, and responsibilities for the 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 to introduction to market 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 is 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 *Element 6* of the *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 diverse and complex portfolio of industrial assets. Maintaining these assets requires rigorous maintenance practices, timely equipment replacement, and strict adherence to safety protocols. Without these controls, there is a risk of losing mechanical integrity or encountering technical, technological, or operational failures, as well as risks arising from natural disasters or human error. Such events may result in significant environmental impacts, personal injury, and substantial costs related to asset damage and environmental remediation.

MOL Group manages these risks through a comprehensive Process Safety Management (PSM) system, as described in the PSM Process Description (internal document), which establishes the Group-wide principles for process safety. Overall accountability for the implementation of the system lies with the Group HSE Director. Key elements of MOL Group's Process Safety Management approach include:

- ▶ **Disciplined framework for hazardous operations:** PSM provides a structured method to maintain the integrity of hazardous operating systems and processes. Its primary objective is the prevention and control of major incidents that could involve the unintended release of hazardous materials or energy.
- ▶ **Prevention of Loss of Primary Containment (LOPC):** The system includes multiple elements—procedures, technical standards, and human-factor controls—designed to identify, understand, and reduce process-related risks. These elements together serve as hardware and organizational barriers to prevent LOPC and other asset-integrity incidents.
- ▶ **Cross-functional system covering the full asset lifecycle:** Due to its broad scope, the PSM system integrates activities across research and development, engineering, construction, operations, maintenance, training, and sourcing. The system structure

follows the principles of the “PSM Wheel,” which defines the key components required for effective process safety management.

- ▶ **Scope of application:** The PSM requirements apply to consolidated MOL Group companies classified as process-safety-relevant (as defined in Section 1.3.1.1 of the internal PSM Process Description). This includes operations involving hazardous chemical and non-chemical processes, assessed based on risk level.
- ▶ **Clear accountability:** Business Unit leaders are responsible for implementing the PSM system within their operations. Implementation is coordinated with the local PSM leader and supported by the Group Process and Fire Safety Leader and the Group PSM Coordinator.
- ▶ **Performance indicators aligned with international standards:** MOL Group monitors and reports process safety indicators in line with API RP 754 and/or IOGP recommendations to ensure consistent and internationally comparable performance evaluation.

Process-based regulations on avoiding, controlling and limiting the environmental and health & safety related impact of incidents and emergency situations are outlined in the *Element 6/A Operational safety; Element 10: Incident Management* and in *Element 11: Emergency Preparedness & Response* 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

The *Security Area Book* is MOL Group’s highest-level, process-based policy governing all security-related services. It sets out comprehensive principles covering security governance, security operations, technical security services, crisis and continuity management, travel security, and anti-fraud and investigation activities. Through these areas, the policy addresses risks and impacts related to the physical security of employees as well as to potential unfair business conduct and fraud. The Group Security Director, as the process owner, is responsible for implementing the policy and identifying regulatory needs. Regulatory documents are issued in cooperation with the relevant local responsible persons. The provisions of the *Security Area Book* apply to all MOL Group companies (including MOL Plc. and controlled operational subsidiaries involved into matrix operations) and are mandatory and binding for all affected employees. To ensure sufficient awareness, MOL Group provides mandatory training covering the key security areas, and all relevant policies are accessible to employees through the 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. 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 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 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 always 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 is ensured, 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,
  - ▶ Bodyguard(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 ensures effective internal communication with employees through adherence to national legislation and its own internal regulations and practices. Works councils operate across MOL Group sites, serving as a dedicated, professional channel for ongoing dialogue and interest representation between management and independently elected employee representatives. Their establishment is legally mandated in many of MOL Group's operating countries.

Local works councils hold regular joint management-employee meetings, as well as sessions with occupational safety committees and forums at various business and company levels (typically quarterly), in line with local laws and operational guidelines. These outline dispute resolution processes, chairing duties, and protections for committee members against reprisals. MOL Group's policy guarantees that neither employees nor their representatives face adverse consequences for upholding safe work practices or raising good-faith concerns about perceived employer negligence. Legislation enables employee participation in multiple forms, tailored to workforce size and organizational structure

Specialized OHS committees operate at local business and company levels, established per legal requirements and employer-employee agreements, with membership independently elected by employees.

For instance, safety representative elections are mandatory for employers with 20 or more employees (MOL and INA) or 10 or more (Slovnaft). Employers must organize these elections and provide necessary conditions. Safety representatives ensure compliance with safe work requirements, particularly regarding:

- ▶ Safe conditions of workplaces, tools, and personal protective equipment,
- ▶ Implementation of health protection measures and prevention of accidents or occupational diseases,
- ▶ Employee training and readiness for safe operations.

To fulfill their duties, safety representatives may:

- ▶ Access operational workplaces during working hours and consult on-site employees,
- ▶ Contribute to employer decisions impacting health and safety,
- ▶ Request employer information on safety-related matters,
- ▶ Voice opinions or propose corrective actions,
- ▶ Join work accident investigations,
- ▶ Escalate justified issues to occupational health and safety authorities,
- ▶ Share observations with inspectors during official audits.

Under local legislation—for instance, in Hungary when the number of safety representatives reaches three—a workplace occupational safety committee may be established. If formed, the committee assumes the rights of individual safety representatives. In such cases, the employer must create a parity safety board with equal representation from employees and employer delegates. The employer is required to appoint a senior decision-making employee and a designated occupational health and safety officer to the board. Chairing duties rotate alternately between employee and employer representatives.

In addition to the aforementioned health and safety communication channels involving employee representatives, MOL Group operates various other interest-protection, information, and consultation committees and councils at local and national levels, as required by applicable laws. These bodies address employee representation broadly, including health and safety topics in collaboration with the structures described above. MOL Group's local councils delegate members to trade unions and works councils. At the Group level, the European Works Council – comprising local council leaders – holds meetings twice a year, with active participation from top MOL Group executives. These sessions cover key business and HSE matters at the highest level, reviewing recent developments, current status, and future roadmaps.

Councils and safety committees cascade relevant information across all local levels. These bodies—trade unions (where applicable), works councils, safety committees, and similar entities—operate diverse channels for raising concerns or needs, including grievance mechanisms,



hotlines, dialogue processes, or other avenues. These enable the workforce or their representatives to highlight impacts or needs for the undertaking to address, whether through direct company-provided channels or those of partner entities.

The operational framework (rules, election processes, cooperation, financial and human resources) for all such bodies is supported by relevant HR departments. Beyond works councils and occupational safety committees, all workers can voice opinions, raise concerns, or report issues (including health and safety) via the Group-wide SpeakUp! whistleblower mechanism.

## ACTIONS AND RESOURCES RELATED TO OCCUPATIONAL HEALTH AND SAFETY

/S1-4/

ESRS	Disclosure Requirement S1-4
GRI	GRI 3, 3-3 GRI 403, 403-9 GRI 403, 403-10

### Actions on occupational health & safety

The most common root causes of occupational health and safety cases were identified as lack of attention or due care. In some cases, inadequate technical conditions were also identified, and rule violations were found in some cases as well. Following the multiyear, smooth implementation of the six Group level Life Saving Rules introduced on 1 January 2020, the consequence management of any rule breaches was improved and unified at the end of the year, with a strong focus placed on addressing these non-compliances. Main consequence management rules were issued already in 2024, but as previously stated, the real implementation and continuous enforcement of these was in focus in 2025 and this is still continuously 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 training for both employees and contractors in compliance with external requirements and internal regulations. To support the continuous HSE education of employees, the Axonify-based adaptive mobile application, LEON, was further expanded. Following its successful introduction in MOL Upstream, the platform was subsequently rolled out in MOL Logistics and extended to nearly all Business Units in MOL Hungary in 2024. The long-term goal is to further extend it to other big operations such as INA and Slovnaft (SN). To support this, a Group Downstream management level pilot continued besides the 6 Life Saving Rules with First Aid training, Fire protection, Process Safety sessions, and pilots also continued in INA and SN. The driving force behind further expansion may lie in individual countries recognizing the genuine value of the methodology and, instead of imposing it artificially on the organization as a parallel, mandatory training process, allowing it to meaningfully and more efficiently replace older, structurally and methodologically outdated compulsory training programs and toolsets – naturally, where required, with the approval and support of the relevant authorities.

As Retail operations managed not only HSE-related content but all business relevant training for Service Station operators on a single platform, the need emerged to move beyond a predominantly one-way training approach and enable true two-way task management. To address this, in Group Retail the eSmile (Axonify platform) was replaced by eSmile v2 (Yoobic platform).

This transition made it possible not only to distribute training materials and monitor their completion, but also to centrally control and manage a wide range of active operational tasks. For example, the system now supports the recording of standard Area Manager HSE inspections and the follow-up of associated corrective and preventive actions, including checklist definition, documentation of findings, assignment of responsible persons, and deadline management. As a result, HSE considerations have been embedded more deeply and systematically into day-to-day operations.

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 previously reported, two major Group level OHS initiatives were launched in 2021: the Personal Protective Clothing (PPC) and the Personal Protective Equipment (PPE) harmonization tenders. Following the successful completion of the PPE tender in 2022, resulting in the conclusion of new contracts, the PPC tender was also successfully finalized at the end of 2023. These steps were taken to ensure the provision of world-class, high quality protective garments for all employees across the Group. First deliveries started in Q2 2024 and are continuing according to the agreed quarterly schedule for our operations in Slovakia and Hungary.

Although overall satisfaction with the new protective garments was high, questions regarding air permeability and water-vapour resistance (i.e., garment breathability, comfort) led to independent laboratory testing in 2025. The results of both tests confirmed the garments' comfort, demonstrating slightly improved breathability and vapour permeability compared to the previously used clothing, while maintaining the same level of protective performance.

Some smaller subsidiaries, such as MOL Romania and MOL Serbia, have also joined the service through accession contracts, following their evaluation of the garments and contractual conditions relevant to them.

In Croatia, a separate contract was also concluded with the same technical content as negotiated and finalized in the Group tender, and supply remained continuous during 2025.

After the preparatory steps taken in 2024, the Safety Awareness Program has been launched at the beginning of 2025, aiming to achieve measurable improvements in safety culture with a primary focus on behavioural safety and operational discipline. This is essential for further improving safety performance of both own staff and that of contractors, as the 2025 results clearly showcase deviation from the best-ever safety performance of 2024, reverting to—and in some cases exceeding—2023 levels, seemingly reaching a virtual performance plateau. Analysis of incident root causes unequivocally indicates that employee inattention, occasional carelessness or indifference, and even deliberate rule violations constrain further gains. These challenges can be addressed through cultivating a unified, coordinated safety culture that permeates all organizational levels and drives meaningful change.

Based on the identified operational risks, the main priority area in this program is personal safety, while contractor safety and process safety are also optionally included. The program involves top and middle management, shop floor employees, and, where applicable, functional staff.

In the initial phase, key priorities include reinforcing Safety Rules through training, enhancing site inspections and management commitment, encouraging employee feedback, conducting local reviews of incidents, assessing safety culture, clarifying HSE responsibilities, and promoting safety awareness through contests, workshops, and dashboards – among other initiatives.

The primary participants were Group Downstream and Group Industrial and Corporate Services, but Group Upstream joined the program shortly thereafter.

The first pillar of the program consisted of managerial workshops designed to align understanding of key needs, strengthen ownership, and enhance role modelling. These workshops also identified the most critical actions in the immediate, short- and medium-term. The program is managed internally and coordinated by Group HSE, with operational program management cascading through the Group's businesses to the local business units and HSE organizations for implementation support. For the safety culture assessment, an international professional service provider was engaged to leverage its expertise. The analysis of the results and the definition of the first wave of actions will begin once the responses have been validated.

Besides the above-mentioned, mainly fully Group-level safety initiatives and actions, many Group Business- or Local Business level 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. These included – as examples - 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 lower levels in Group Upstream, Group, MOL and INA Logistics levels and Lubricants. Unsafe, unconscious behaviour concept emphasized in MOL Upstream, Group Production, Logistics and Lubricants. Different local bonus-malus systems launched on different areas for own staff and contractor employees, evaluating their everyday approach to safety aspects and rules. Further local special, occasional trainings, action and/ or communication campaigns involving all levels from shopfloor 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 activity and turnaround. In Duna Refinery, Hungary, the FER Fire Brigade's Training Center was also used for practical trainings 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.

To improve contractor work safety, both MOL and INA have launched major developments in their work permitting systems in 2025. These improvements aim to ensure more reliable risk management through more effective site preparation, provide stronger system support for processing available data, and enable faster, more user-friendly process execution. Both projects are to be finalized in 2026.

MOL Group continued to strengthen its overall Contractor-HSE program to improve the performance. The contractor HSE qualification and audit process, which was released in 2023, is being further improved, in 2025 emphasizing proper contractor selection and ensuring adequate preparation in line with existing conditions before contractors were mobilized to their worksites. Building on the 2024 decision to enhance service procurement processes and the supporting system (SAP Ariba), several system and process improvements were implemented in 2025, fully following the proposal approved by the Steering Committee in December 2024. While these steps have strengthened the reliability of the contractor selection process, it remains an ongoing effort. Further harmonization and improvements of systems, processes, and regulations are planned for 2026.

The Injury Prevention Action Plan developed and implemented in 2023 within Group Industrial and Corporate Services (including all Single Service Companies) focused on the most typical areas of contractor management and the lifecycle of contracted on-site activities, with the objective of reducing risks and injury occurrence. The plan was assessed as only partially successful: while no high-severity injuries occurred in 2025 during SSC and their contractor-related activities, an unacceptably high number of minor incidents – primarily slip-and-trip events and hand injuries – were recorded. Accordingly, coordinated efforts at both Group and local levels are intended to be sustained to ensure continued progress.

In line with the decreased contractors' worked hours (by more than 10% in 2025, not considering the not own FS staff) we performed a slightly decreased amount of site inspections as well in 2025 (23,500) in comparison to 2024 (30,012) in order to cover as many contractor activities as possible. This is also affected by the realisation that the high inspection numbers do not necessarily deliver better safety performance, so the intention was to rather focus on depths and professional quality of the inspections. A new methodology was introduced in the beginning of 2023 to record inspections in Enablon (Enablon Inspection Module), for better data analysis and improving action definition. Large-scale implementation truly began in 2024, marked by numerous bottlenecks, iterative improvements, and comprehensive user interaction. By 2025, a decisive shift occurred from manual inspection data recording and reporting to fully automated processing – though this transition moderately tempered the growth in inspection volumes. Meanwhile, inspection quality, sustained from 2023 levels and even slightly enhanced, is evidenced by the rising share of site inspections uncovering non-compliances: from 15% in 2023 to 18.7% in 2024, and 19.6% in 2025.

In 2025 we succeeded to sustain the previously increased number of pre-qualification audits compared to previous years, which resulted a higher coverage of audited contractors: the number of pre-qualification audits in 2024 significantly increased to 363 (it was 255, in 2023), and in 2025 similar number was executed (358). The quality and depth of these was also reinforced, however the ratio of successful pre-qualification contractor audits was the same as in 2024 (96% in both 2024 and 2025, after a slight increase from 93% in 2023). 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 (36 cases in 2025 compared to 80 in 2024, showing a better compliance level), or initiating written warnings as well (693 cases in 2025 compared to 747 cases in 2024). Both are reflecting the continuous consequent and strict application of the consequence management initiatives.

In 2025, the company allocated a total of USD 23.0 million to Occupational Health & Safety activities (excluding REACH-related expenses, which are reported separately), representing a 15% increase compared to USD 19.9 million in 2024.

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 related to process safety**

In 2025, MOL Group continued to implement targeted safety programs addressing both workplace safety and process safety. These initiatives focused primarily on strengthening the safety culture and raising awareness—key enablers for consistent compliance with safety rules. The Downstream campaign targeted four shared priority areas, combining established practices such as process safety fundamentals, performance “health-check” audits, and safety tours with new initiatives including enhanced operating discipline and the rollout of the LEON mobile application. A cross-country audit program was launched across all business divisions to support continuous improvement and ensure compliance not only with local legal requirements but also with relevant industry standards. For major capital investment projects, a Commissioning Excellence Program was initiated, in which Process Safety Management (PSM) plays a central role. Within the Retail business, PSM requirements were supported through tailored methodological guidance aligned with the Group PSM Process Description.

#### **Actions related to workers' security**

MOL Group has Upstream operations in the Tal Block in Pakistan, which is considered a volatile security-risk area due to increased activity by Tehrik-i-Taliban Pakistan, a militant group. The safety and security of personnel and assets continue to be prioritized through heightened security measures, local engagement, and close cooperation with Pakistani authorities.

In 2025, three serious security incidents occurred:

- ▶ On 6 August, a MOL escort vehicle travelling from the Manzalai Gas Plant to the Central Processing Facility was ambushed by terrorists. The attack resulted in the tragic loss of four contracted personnel: three Frontier Constabulary security members and the driver. Upon receiving the incident report, another MOL escort vehicle, accompanied by police, was immediately dispatched to the location. Security officials reinforced the response and ensured area control. The teams secured the scene and transported the deceased personnel to hospital. In line with the security advisory issued after the incident, all off-site movements were suspended.
- ▶ On 16 November, armed terrorists entered a wellhead site, threatened the Frontier Constabulary security guards, and seized their weapons. The incident did not result in casualties or personal injuries.

- ▶ On 26 December, an improvised explosive device was dropped from a drone by the terrorist group and detonated near the plant premises. No casualties occurred, and no damage was caused to plant infrastructure.

No MOL employees were injured during any of the incidents, and none of the events resulted in operational disruptions.

## TARGETS RELATED TO HEALTH AND 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 2 quartile of 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 (fatalities included), restricted workday cases, and 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 for the already HSE integrated business divisions within the Group (HSE MS covered businesses and entities). This limit is subject to approval by the Chief Executive Committee. For 2025, the Group-level tolerable TRIR limit was set at 1.25. The final rate in 2025, as consequence of high number of mainly low severity total recordable injuries (slip&trip-kind and small hand injuries) is 1.40, not meeting the set target.

Representatives of the works councils, representing the employees, are also involved in the development and formulation of Group strategic objectives, that is, medium- and long-term goals. To achieve these objectives, the annual HSE (Health, Safety, and Environment) targets are defined through collaboration between the business and HSE functions, considering external, relevant industry performance benchmarks, our own yearly performance development, and the expected outcomes of programs introduced to set ambitious yet realistic goals. Following the finalization of the objectives, they are communicated through a cascading process across both business and HSE lines – first to senior management, then to group business/HSE managers, local business/HSE managers, and so on – ensuring that the information reaches all employee levels. The monitoring of objective achievement – specifically HSE performance, such as the evolution of the current TRIR value – is based on data from the near real-time incident reporting system and from the extensive information collected during monthly campaigns within the same system (Enablon). These data are processed to produce ad-hoc, monthly, quarterly, half-yearly, and annual reports with varying levels of detail and content, supporting a better understanding of each area's status and the formulation of effective actions accordingly.

For 2026, considering the previous years' TRIR performance trends and MOL Group's target trends, and considering the Global and European Upstream and Downstream players' TRIR performances in recent years, the Group-level TRIR target has been repetitively set to 1.25, underscoring the commitment to a smooth, reliable, continuous improvement in worker safety.

### Targets on process safety

MOL Group's 2030 target is to put the overall number of Process Safety TIER 1 incidents on a downward trendline. TIER 1 incidents are defined as an unplanned/uncontrolled release (including non-toxic and non-flammable materials) from a process that results in a significant incident. For 2025, the appointed tolerable limit of TIER 1 events for companies covered by HSE MS was set for 7 in total, with the following breakdown:

TOLERABLE LIMIT FOR TIER1 EVENTS	UNIT OF MEASURE	2025 under HSE MS	2024 under HSE MS	ESRS
Exploration & Production	number	3	3	-
Downstream Production	number	4	4	-
Downstream Logistics	number	0	0	-
Retail	number	0	0	-

Target setting includes a tolerable limit of 4 for hydrocarbon-containing material spillages exceeding 1 m<sup>3</sup>. For Downstream Production, a numerical target of 4 maximum allowed incidents is defined, while for Upstream and Downstream Logistics, the continuation of surface integrity and corrosion management programs must be ensured with a verifiable 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

MANAGEMENT SYSTEM COVERAGE	UNIT OF MEASURE	2025	2024	ESRS
Employees covered by a health and safety management system	%	92	95	S1-14_02
Operational sites for which an employee health and safety risk assessment has been conducted	%	100	100	-

92% 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. Considering the already HSE integrated MOL Group companies, 100% of operational sites have gone through an employee health and safety risk assessment.

OCCUPATIONAL HEALTH AND SAFETY EVENTS	UNIT OF MEASURE	2025 Under	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
Fatalities as result of work-related injuries - own workforce (own staff + contractors)	number	5	5	0	0	S1-14_02
Fatalities as result of work-related ill health - own workforce (own staff + contractors)	number	0	0	0	0	S1-14_02
Recordable work-related accidents (TRI) - own workforce (own staff + contractors)	number	135	451	95	96	S1-14_04
Rate of recordable work-related accidents (TRIR) - own workforce (own staff + contractors)	per 1 mn worked hours	1.4	8.45	1.04	N/A	S1-14_05

MOL Group provides a comprehensive list of data around work related injuries, covering both own staff and contractors for all entities under the scope of HSE MS. 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 within its scope. 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 are 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 2 quartile of 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 work related injuries, covering all own workforce (own staff and contractors) as described above.

Rates have been calculated based on 1 million working hours, as one of the two options being suggested by the GRI Standards.

However, for those financially consolidated companies, who are not under the scope of HSE MS, no contractor data is available, only own staff TRI data were collected. Consequently, the own staff and contractor data aggregation is not, or only partially possible. Where the HSE integration is possible, the process takes maximum three years, during which the full data reporting is being built gradually – under this period, besides the own staff TRI and TRIR figures, only limited data integration is possible. Hence, no contractor data was collected from consolidated companies out of HSE MS scope. Considering both own staff and contractors for consolidated companies (401) and only own staff from under the HSE MS scope (50), 451 incidents are reported TRI indicator on the Consolidated companies scope for 2025. TRIR on the Consolidated companies scope is also calculated accordingly: Own staff and contractors TRI and worked hours for HSE MS covered, but only own staff data for consolidated companies out of HSE MS scope are included.

### Fatalities

In 2025, MOL Group was unable to meet our safety objectives, not only in terms of Total Recordable Incident Rate (TRIR) but also regarding fatalities, where still zero remains the only acceptable target. During the year, one fatality occurred involving a MOL employee in MOL Logistics during railway shunting operations, as a result of non-compliance with established safety rules. Additionally, four contractor fatalities were recorded in MOL Pakistan due to an armed terrorist attack (off-site, during a work-related travel between sites). Furthermore, we must account for a third-party work-related fatality involving two external victims. This latter incident took place in MOL Serbia, where a Retail Area Manager collided with another vehicle that was stationary in the fast lane of a highway, resulting in two fatalities among the four passengers in that vehicle.



## Personal safety

MOL Group experienced a 42.1% YoY increase in Total Recordable Injuries (TRI) among own employees and contractors, reaching a combined 135 in 2025 (95 in 2024), resulting that MOL Group recorded a 34.6% increase in the Total Recordable Injury Rate (TRIR, measured by number of TRI cases per one million worked hours) including own staff and contractors as well (reaching 1.40 in 2025, compared to the best ever TRIR of 1.04 in 2024). However, this represents only a 12% exceedance of the 1.25 tolerable limit set for the year. This TRIR value increase occurred despite the fact that various different actions continued from previous years and newly initiated locally tailored ones by our Business Units and sites, showing the fact that there isn't a direct and short term obvious connection between the initiatives, actions, risk management steps and low severity, slip&trip kind or hand injuries having been caused usually by brief lapse of attention. The mentioned actions 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 included).

Similarly to TRI value increase, during 2025 the number of Lost Time Injuries (LTI, including own staff and contractor fatalities) increased by almost 46.4%, to 123 in 2025 from 84 in 2024, which resulted in also a significant increase (38%) in Lost Time Injury Frequency (LTIF, measured by number of LTI cases per one million worked hours): to 1.27 during 2025 compared to the 0.92 LTIF recorded in 2024.

Overall, the biggest ratio of the TRIs during 2025 were still slips, trips, small falls on same level (generally caused by human error and/or lack of attention), making up 30% of all injuries, followed by different finger and hand injuries (24%). Evaluating the causes of all 135 TRIs which happened in 2025, an unacceptably high ratio, 55% is to be linked to lack of attention, and rule violation was the main cause for a further 15%, so 70% depends clearly on human behaviour: mindfulness, presence, and a conscious decision. However, for 2025 not only the background causes of TRI cases were analysed, but of all (own and contractor) FACs (first aid cases, less serious than TRIs, thus not recordable) as well: altogether, this way the top two nature is the same, but in a changed order: the small hand injuries are leading the statistics (23%), the slips, trips, falls are in second place (20%), while in relatively high numbers, insect bites are the third highest (14%) ones. In this evaluation, the lack of attention is still the main cause, representing 43%, while rule violation is the third, with 13% share.

## Work-related ill health

MOL Group didn't register any occupational illness for own staff employees during 2025 – including the non-HSE MS, financially consolidated entities as well.

- ▶ The number of fatalities as a result of work-related ill health: 0
- ▶ The number of cases of recordable work-related ill health: 0

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 its management is the employers' right and task by law.

In order to avoid all work-related ill health cases, irrespective of 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. Risk/hazard assessments are carried out locally, action planning (including using the hierarchy of controls) are also done locally for work-related hazards that pose a risk of ill health. Thanks to this conscious approach, only one work-related ill health case occurred in more than 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 from these processes.

Methodology for calculation is found in the MOL Group Reporting Handbook, available for internal users.

MOL Group does not disclose either the number of fatalities and recordable cases as a result of work-related ill-health, or the main types of work-related ill health cases, of other people than employees, since their management is the employers' right and task by law.

## Contractor safety

In 2025, four contractor fatalities were recorded in MOL Pakistan due to an armed terrorist attack, off-site, during a work related travel between sites. The situation is considered rather security relevant case than a safety relevant event.

However, also from contractor LTIF and TRIR performance view, the levels increased back from the best ever 2024 values to rather 2023 figures, underlining the already mentioned fact, that there isn't a direct and short term obvious connection between the initiatives, actions, risk management steps and low severity, slip&trip kind or hand injuries having been caused by brief lapses of attention.

MOL Group experienced increased Lost Time Injury Frequency for contractors (measured by the number of LTI cases per one million worked hours) rose sharply by 87.5% year-on-year—from 0.40 in 2024 back to 0.75 in 2025, mirroring 2023 levels (0.67). Excluding not own service station staff, the increase was even steeper at 138% YoY, climbing from 0.47 in 2024 to 1.12 in 2025 practically reverting to 2023's level of 0.97. Parallely, the Total Recordable Injury Rate for contractors (measured by number of TRI cases per one million worked hours, including not own service station staff) also increased to similar value as it was in 2023 (0.81) but in smaller proportion, by 68.5% year-on-year, from 0.54 in 2024 to 0.91 in 2025.

Due to the decreased contractor worked hours in 2025 (without considering the not own service station staff, contractor worked hours decreased by approx. 3.07 million hours, more than 10%), the increased number of recordable injuries (39 in 2025 compared to 21 TRIs in 2024) resulted in proportionally bigger increase of Total Recordable Injury Rate, 1.45 in 2025 compared to 0.71 in 2024.

#### Process safety

PROCESS SAFETY EVENTS	UNIT OF MEASURE	2025 Under HSE MS	2025 Consolidated companies	2024 Under HSE MS	2024 Consolidated companies	ESRS
TIER 1 Process Safety Events	cases	5	5	9	9	-
TIER 2 Process Safety Events	cases	21	21	21	21	-
TIER 3 Process Safety Events	cases	1,104	1,087	1,436	1,436	-
TIER 1+2 Process Safety Event Rate	cases/mn worked h	0.75	0.76	0.91	0.91	-

In 2025, the number of TIER 1 Process Safety Events (PSE) reached 5 across the Group, a smaller number compared to 2024, driven by the extensive safety programs with the operational discipline in the focus, continuous progress of preventive maintenance and integrity management.

There was one extensive fire (over \$1 million direct loss) as a result of integrity loss, which led to the temporary outage of a unit in the Danube Refinery, in most cases the reason was loss of primary containment, resulted in personal injuries in only one case. Two out of the three Downstream cases were related to loss of equipment integrity during standard operation. Retail operations registered 1 TIER one event in 2025. Of the five TIER 1 events, one was Severity 5 (very high), one classified as Severity 2 (medium), three cases as Severity 1 (low). A combined two events were labelled as HiPo. Group-level TIER 1 PSE target was set to seven, and a target of zero greater than \$100'000 direct loss as a result if fire/explosion and no terminal outage of operation as result of Tier1 has been set by 2026. 21 TIER-2 process safety event has been registered in 2025, similar number to 2024. The result of leakages were material releases, fires and asset damages, mainly related to the breakage of mechanical integrity. In 2025 there was a further decrease in the combined number of TIER 1+2 incidents (26) compared to 2024 (30).

Combined TIER 1+2 Process Safety Event Rate (PSER) for 2025 was 0.75 considering companies under the HSE Management System. 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 causal factors. In 2025 a wider focus was put on simple investigations to see the quality and make preventive actions prevailing in the future.

## SUB-CHAPTER C: ETHICS

### 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

#### General policy commitments related to ethics at the workplace

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.

The Board of Directors is the owner of the Ethics and Compliance programme, with responsibility for its implementation, monitoring and review. Sustainable Development Committee, which is a sub-committee of the Board of Directors, is responsible for monitoring the development and implementation of all sustainability related policies, including diversity. Top managerial position responsible for People aspect of the Shape Tomorrow Strategy - including diversity & inclusion related targets and diversity initiatives - is the Group Human Resources Senior Vice President.

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 Business Conduct 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. All business partners must receive the *Business Partner Code of Ethics*. MOL Group makes conscious and continuous efforts to implement the Code and to ensure that ethical norms are adopted. All new joiners 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 member companies employing the majority of the Group's employees. Further information can be found in sections on Policies and engagement related to own workforce and Actions related to human resources 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**

MOL Group respects and actively promotes human rights across its value chains, ensuring compliance with corporate policies, laws, and regulations while engaging stakeholders and contributing to community well-being. Human rights abuses are opposed by MOL Group, and the impact of its activities is assessed to safeguard these rights. Focus areas include workers, suppliers, local communities, and vulnerable groups such as women, minorities, children, persons with disabilities, indigenous people, and migrant workers and their families. Tribal populations and indigenous peoples are protected by MOL Group, and forced relocations are avoided. Human rights compliance is prioritized among security service providers acting on behalf of MOL Group. MOL Group's whistleblower mechanism provides access to, and places emphasis on, the provision of an effective remedy for any impact on human rights. Detailed disclosure on the whistleblower mechanism is provided in *S1-C: Policies related to grievances and remediation*.

#### **Health, safety, environment (HSE) and security**

As a major energy company, MOL Group recognizes the high safety risks inherent in its operations and their potential impact on the environment. MOL Group is committed to managing risks responsibly, respecting human rights, avoiding harm to people and the environment, and reducing HSE risks arising from its activities. Safe working conditions are pursued by MOL Group, together with improvements in environmental management and the fostering of an active HSE culture through reliable equipment, skilled personnel, and sound practices. In addition, MOL Group prioritizes the security of individuals on its premises and the protection of MOL Group assets—including employees, technologies, physical resources, information, and reputation—against security threats. Detailed disclosures related to worker health, safety, and security are provided in subchapter S1-B.

## Equal treatment and opportunities

MOL Group is committed to combatting discrimination in all areas of the workplace, throughout its supply chain, and in society as a whole. MOL Group recognizes the value of diversity. Employees, customers, business partners, suppliers, and other external stakeholders connected to MOL Group represent many countries and hold diverse nationalities, faiths, religions, beliefs, cultures, and social origins. Cultural diversity, the development of an international team, and an inclusive business community are supported by MOL Group. MOL Group is committed to prohibiting and preventing discrimination of any kind, including 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. Equal opportunities are provided by MOL Group to everyone based on merit, except when specific professional abilities justify selection. Unlawful discrimination is not tolerated, and MOL Group's 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. A fiduciary relationship is maintained by MOL Group with its stakeholders, and the same is expected in return. Harassment, intimidation, or any behaviour that is degrading, offensive, or hostile is not tolerated. Sexual harassment, defamation, and slander are regarded by MOL Group as serious violations of human dignity. Everyone within MOL Group, its supply chain, and its communities is entitled to courtesy and respect.

## Protection of privacy

MOL Group is committed to respecting people's privacy and keeping their personal information confidential. Personal information is only acquired and kept when necessary in order to operate the company effectively, 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

MOL Group considers employees to be its most valuable resource. The development of employees, their work-life balance, and adherence to lawful and fair employment practices are prioritized by MOL Group. Forced labour, child labour, and unethical practices such as wage withholding or denying rights such as sick leave are strictly prohibited across MOL Group's operations and supply chains. A minimum working age of 15 for non-hazardous work and 18 for hazardous work is upheld by MOL Group, unless higher limits are required by local laws. Fair employment is ensured by MOL Group, support is provided to employees with special needs, and disciplinary actions and redundancies are handled with fairness and transparency. Freedom of association, union membership, and collective bargaining rights are respected by MOL Group. Further information can be found in "*Policies & engagement related to own workforce*" section in subchapter S1-A.

The enforcement of these principles is operationalised through MOL Group's internal regulations. The highest-level process-based regulations are the *Human Resources Area Book* and the *Diversity & Inclusion (D&I) Process Description*. The provisions of these regulations are mandatory and binding for affected employees and are cascaded to all companies across the Group (MOL Plc. and its controlled, operational subsidiaries involved in matrix operations) through the local HR departments, which are responsible for local action planning in line with the Group pillars. The key objective is to foster an inclusive workplace that promotes diversity, equality, and respect across all operations by establishing and regularly updating MOL Group's *D&I Framework*. This framework serves as the foundation for all human resource processes, focusing on key areas such as employee well-being, work-life balance, gender equality, age diversity, and the inclusion of employees with 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 Board of Directors. Feedback is actively integrated into action planning and framework updates, ensuring continuous improvement.

Besides applying these standards into 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), they are trained in human rights policies and procedures. To monitor compliance, MOL Group performs multi-tiered evaluations that 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 are 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. SpeakUp! serves as an independent reporting hotline, which is available 24/7.

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. The Regulation of managing whistleblower reports in MOL Group ensures that reporters shall be able to use their local language during the whole procedure. At the request of the reporter or the implicated person, the use of their mother tongue during the procedure shall be ensured by the Ethics Council primarily with the assistance of the local Ethics Officer, and shall provide the documents in their mother tongue.

### 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.
- ▶ Formulating a proposal (recommendation) to remedy the violation, to take appropriate corrective measures and to take appropriate measures to avoid and prevent violations of the Codes and reduce risks.

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, which implements the EU Whistleblower Protection Directive (Directive (EU) 2019/1937), ensuring consistency with requirements across EU Member States where MOL Group operates. 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. The Ethics Organization regularly publishes articles on MOL Group's intranet platform to raise awareness of the reporting options and the available channels. These recurrent communications help increase workforce awareness and support the understanding and accessibility of the reporting system. In addition, Local Ethics Officers and the Group Ethics Officer remain continuously available to answer questions regarding the procedure and to receive feedback on its functioning. This ongoing dialogue and personal accessibility contribute to strengthening trust in the reporting channels and to the continuous improvement of the ethics reporting system.

## 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 continued to strengthen its Diversity, Equity, Inclusion, and Belonging (DEIB) agenda through a series of group-level webinars focusing on topics such as Women@Work, Intergenerational Collaboration, Neurodiversity, and Patchwork Families with altogether 430+ participants. The HR Newsletter's DEIB Corner further raised awareness on gender diversity, multigenerational cooperation, autism inclusion, cultural sensitivity, dementia awareness, and menopause. In addition, we supported the Changed Working Capacity event and held a DEIB roundtable to gather market insights for the upcoming DEIB framework revamp.

### Actions on incidents and complaints related to a fair, ethical, inclusive work environment

MOL Group assesses all reports and complaints through a uniform, documented investigation process. The first step of the investigation is to record the facts and determine the severity of the risk. The necessary actions are defined based on the findings of the investigation report, the assessment of ethics experts, and the feedback of the relevant business unit. This process ensures that the measures taken are proportionate, consistent and fact-based.

The company implements a range of measures to prevent, mitigate and remedy negative impacts, as well as to promote positive impacts. These measures include annual ethics trainings and awareness-raising initiatives published on internal platforms, such as intranet-based communications and targeted internal awareness campaigns. These campaigns are designed around ethical topics that appear particularly relevant or problematic during a given period. For example, around holiday seasons, practical guidance is provided on business gifts, using insights from actual questions and cases received through the reporting channels. The effectiveness of these campaigns is monitored through readership analytics provided by the Corporate Communications function, with performance typically falling within the 'top third' of internal articles based on viewership metrics.

The company allocates dedicated human resources to ensure the effective operation of its ethics and reporting framework. Each Group company employing more than 20 people has a designated Local Ethics Officer, who provides direct, locally accessible support to employees and handles ethics-related questions and concerns. Their work is coordinated by the Group Ethics Officer, who ensures consistent investigation standards.

In 2025, the Ethics Council received 51 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 21 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 2025 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 are to constantly ensure that all of its employees successfully complete the annual ethics training, and to reach the targeted minimum 30% of women in management by 2030, applicable on grades HAY 18 and above. These targets are publicly communicated – including in MOL Group's Shape Tomorrow Strategy.

WOMEN IN MANAGEMENT	UNIT OF MEASURE	2025	2024	2023	2022	2021
Percentage of female managers	%	29.1	28.2	27.9	26.5	25.9

The target is in line with MOL Group's Diversity & Inclusion Framework. The target is tracked annually through the annual sustainability data collection process.

## METRICS RELATED TO CHARACTERISTICS OF EMPLOYEES

/S1-6/

WORKFORCE	UNIT OF MEASURE	2025	2024	ESRS
<b>Number of employees (headcount)</b>	<b>persons</b>	<b>28,743</b>	<b>25,528</b>	S1-6_01,S1-6_02,S1-6_09
o/w Male	%	71.7	73.1	S1-6_01
o/w Female	%	28.3	26.9	S1-6_01
<b>Full time employees</b>	<b>persons</b>	<b>28,242</b>	<b>24,957</b>	
o/w Male	%	72.0	73.8	S1-6_01
o/w Female	%	28.0	26.2	S1-6_01
<b>Part time employees</b>	<b>persons</b>	<b>501</b>	<b>571</b>	
o/w Male	%	34.6	45.7	S1-6_01
o/w Female	%	65.4	54.3	S1-6_01
<b>Permanent employees</b>	<b>persons</b>	<b>22,435</b>	<b>22,347</b>	S1-6_7
o/w Male	%	74.1	74.5	S1-6_7
o/w Female	%	25.9	25.5	S1-6_7
<b>Temporary employees</b>	<b>persons</b>	<b>1,504</b>	<b>1,934</b>	S1-6_7
o/w Male	%	55.0	61.0	S1-6_7
o/w Female	%	45.0	39.0	S1-6_7
<b>Number of employees who have left undertaking</b>	<b>persons</b>	<b>3,299</b>	<b>2,852</b>	S1-6_11
Turnover rate	%	12.4	12.8	S1-6_12

WORKFORCE BREAKDOWN BY COUNTRY	UNIT OF MEASURE	2025	2024	ESRS
Number of employees in Croatia	persons	8,167	8,453	S1-6_05
Number of employees in Hungary	persons	10,756	10,130	S1-6_05
Number of employees in Slovakia	persons	3,059	3,058	S1-6_05
Number of employees in Non-European Union countries	persons	361	377	S1-6_05
Number of employees in Other European Union countries	persons	1,596	1,618	S1-6_05

Employee data is based on annual sustainability data collection. Employee numbers are reported in head count and reflect year-end closing. Information on the number of employees can be cross referenced to the General information section and the Employee benefits expense line item in the Consolidated Profit and Loss Statement of MOL Group's Consolidated Financial Statements.

Total headcount of MOL Group companies increased from 25,528 to 28,743 primarily due to the consolidation of new entities such as MOHU Budapest Zrt. MOL Group reports human capital data with three different scopes: Total number of employees, Full-time employees and Part-time employees are reported for all MOL Group companies. The underlying gender ratios, the number of leavers and turnover rates are calculated based on the HR system integrated companies where such data collection occurs. The headcount of HR integrated companies at the end 2025 was 25,201. Finally, other social metrics in this chapter are collected and calculated based on the group of companies integrated into the sustainable development HR data collection process. The headcount of such companies at the end of 2025 was 23,939. During the calculation of permanent and temporary employees, permanent employees are defined as ones with indefinite term contracts, while temporary employees are defined as ones with fixed term contracts.



## METRICS RELATED TO DIVERSITY AND INCLUSION

/S1-9; S1-12/

ESRS	Disclosure Requirement S1-9, S1-12
GRI	GRI 405, 405-1

GENDER DISTRIBUTION OF TOP MANAGEMENT	UNIT OF MEASURE	2025	2024	ESRS
Number of male employees	persons	48	50	S1-9_01
Number of female employees	persons	4	4	S1-9_01
Percentage of male employees	%	92.3	92.6	S1-9_02
Percentage of female employees	%	7.7	7.4	S1-9_02

The top management of MOL Group – defined based on HAY grade methodology, where positions graded as HAY 24 or above are considered top management – consists of 48 individuals, of which 4 are female top managers.

AGE DISTRIBUTION OF EMPLOYEES	UNIT OF MEASURE	2025	2024	ESRS
o/w below 30 years old	%	13.9	14.5	S1-9_03
o/w between 30-50 years old	%	54.1	54.6	S1-9_04
o/w over 50 years old	%	32.0	30.8	S1-9_05

The age distribution of MOL Group employees remained consistent with previous years.

## METRICS RELATED TO REMUNERATION (PAY GAP AND TOTAL REMUNERATION)

/S1-16/

Pay gap reflects the difference between average total monthly base salary of female and male employees. As such, the calculation does not include benefits in cash and in kind, and variable elements of the remuneration framework.

PAY GAP	UNIT OF MEASURE	2025	2024	ESRS
Rate of average base salary of women to average base salary of men	%	100.3	93.3	S1-16_01

The excessive pay 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 median annual total remuneration is based on annual base salary for employees.

The ratio is not available for the median annual total remuneration for all MOL Group employees due to limitations in the data collection process.

EXCESSIVE PAY	UNIT OF MEASURE	2025	2024	ESRS
Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees	number	99.5	96.3	S1-16_02

## METRICS RELATED TO INCIDENTS AND COMPLAINTS RELATED TO 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

	UNIT OF MEASURE	2025	2024	ESRS
Incidents of discrimination	number	0	1	S1-17_02
Complaints filed through channels for people in own workforce to raise concerns	number	95	104	S1-17_03
Complaints filed to National Contact Points for OECD Multinational Enterprises	number	0	0	S1-17_04
Fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	million HUF	19.0	0	S1-17_05



	UNIT OF MEASURE	2025	2024	ESRS
Severe human rights issues and incidents connected to own workforce	number	0	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	0	S1-17_09
Fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	million HUF	0	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.

Regarding INA Group, there was one judgement in a dispute conducted before a civil court against INA, d.d. related to discrimination and mobbing. The lawsuit was initiated in 2015 by a former employee, and by the final judgment issued in March 2025 the claim was accepted. INA complied with the decision and paid HUF 19,018,454 on April 17, 2025.

## AFFECTED COMMUNITIES

/S3/

### IMPACTS AND RISKS RELATED TO AFFECTED COMMUNITIES

/S3.SBM-3 9-11, AR 5-8/

ESRS	Disclosure Requirement S3.SBM-3
GRI	GRI 3-3-a GRI 413-2-a

#### Interests and views of stakeholders

MOL Group recognizes affected communities as key stakeholders and integrates their views, interests, and rights into its strategy and business model. Engagement is guided by principles of inclusivity, transparency, responsiveness, and accountability, as outlined in MOL Group's [Community Engagement Methodology Guide](#) based on the AA1000SES:2015 Stakeholder Engagement Standard.

#### Types of affected communities and related impacts

MOL Group is a major market player and employer with a sizeable operational footprint and plays 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 industrial activities, such as pollution, odour, noise and light are a cause of concern for communities living nearby operational sites. Consequently, MOL Group's operations are subject to special attention from stakeholders, especially from local community in areas where MOL Group conducts its operations:

- ▶ 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 is located near Zalaegerszeg (Hungary). Most concerns of communities nearby these sites relate to air quality, as refineries and petrochemical plants create nuisance odours and air emissions from refining crude oil, directly affecting the quality of life of nearby residents; whilst inherent safety risks related to industrial operations are also present.
- ▶ MOL Group's **Exploration and Production** portfolio covers operations in Hungary, Croatia, and Pakistan. In Hungary, more than 1,000 producing oil and gas wells are in operation across Central, Southern, and Eastern regions; in Croatia, activities include approximately 1,200 onshore wells and offshore gas production from 10 fields in the Northern Adriatic; and in Pakistan, the TAL Block in the Kohat Plateau of Khyber Pakhtunkhwa hosts over 40 wells, while the Margala Block spans the Islamabad Capital Territory and extends into Punjab and Khyber Pakhtunkhwa, with two exploratory wells drilled to date. Many of the onshore fields are located near small towns and rural settlements. Potential negative impacts on local communities include noise pollution from drilling rigs, compressors, and pumping equipment, particularly during exploration and well completion phases, dust and odour emissions particularly during flaring activities, and accidental spills or leaks of materials which could contaminate soil or groundwater.
- ▶ MOL Group's activities also include other services with an extensive network of sites but a significantly smaller operational footprint compared to core production activities. Although these activities have far shallower impacts on local communities, and the number of complaints is significantly lower, MOL Group applies the same standards of mitigation measures and grievance mechanisms to ensure that all concerns are addressed promptly and transparently. **Retail operations** across Central and Eastern Europe comprise approximately 2,300 service stations, primarily located along major roads and in commercial areas. Community impacts are generally limited to occasional concerns about traffic flow or noise during maintenance works. **Waste management services** in Hungary involve collection, sorting, and recycling activities at designated sites. While these facilities handle large waste volumes, they are typically situated in industrial zones, and potential nuisances such as odour or traffic are mitigated through strict operational standards. **Midstream segment** relies on an extensive high-pressure pipeline network and compressor stations across Hungary, which are generally located away from densely populated areas. Potential disturbances, such as noise from compressors or temporary disruptions during maintenance, are rare and closely managed.

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.

#### Human rights & indigenous people

MOL Group's operations are concentrated in developed European countries, human rights abuses, such as modern slavery or child labour are highly unlikely. The Group has no operations in proximity to vulnerable groups of indigenous peoples. Therefore, no material impacts or risks have been identified for these topics in relation to MOL Group's own operations. Potential negative impact associated with the upstream and downstream value chains has also been considered during the assessment. Whilst actors in the downstream value chains

are primarily located within in low risk regions, procurement from regions with weaker regulatory frameworks may pose risks to the human rights of local communities, particularly in extractive industries.

#### List of material IROs related to affected communities

In conclusion, the 2025 double materiality assessment entails 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 with the lack of consultation or limited engagement has the potential to also materialise 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. The material IROs related to affected communities are listed below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Opportunities for local communities	MOL Group supports local communities by engaging with local organisations through targeted initiatives by building long-term partnerships that contribute to social well-being.	Own operations: Group-level	- Short - Medium - Long
Actual positive impact	Supporting local communities	MOL Group actively supports local communities through corporate volunteering, sponsorships, and donations. These initiatives aim to address local needs, strengthen community ties, and promote social development by encouraging employee engagement and supporting education, culture, sports, and social welfare programs.	Own operations: Group-level	- Short - Medium - Long
Actual negative impact	Disturbance from operations	Sites operated by MOL Group are often in or near residential areas. Despite preventive measures, operations may cause disturbances such as noise, light pollution, odours, and potential incidents of ground or water pollution. The company continuously works to minimize these impacts and maintain community trust.	Own operations: Group-level	- Short - Medium - Long
Actual negative impact	Industrial accidents	Operations at MOL Group's carry inherent safety risks. The company is committed to minimizing these risks through continuous safety improvements, training, and incident response preparedness. While strict safety protocols and preventive systems are in place, accidents can still occur, potentially affecting not only own staff but nearby communities.	Own operations: Group-level	- Short - Medium - Long
Potential negative impact	Potential negative impact on local communities and human rights in the upstream and downstream value chain	Large industrial sites operated by MOL Group's suppliers and customers can both positively and negatively influence nearby communities. In the upstream value chain, procurement from regions with weaker regulatory frameworks can pose risks to the human rights of local communities, particularly for suppliers in extractive industries. In the downstream value chain, where operations are primarily located within European countries, severe human rights impacts are highly unlikely. However, industrial customers such as buyers of polymers, base chemicals, and natural gas may cause disturbances to local communities through noise, odour, and light pollution during their operations.	Upstream and downstream value chain	- Short - Medium - Long
Risk	Social license to operate: Complaints or local community opposition	Proximity of sites to residential areas increases exposure to local concerns such as noise, odour, land use conflicts, and community expectations for employment. If not adequately managed, these issues may lead to community opposition, protests, or obstruction of operations. Consequences may include project delays, restricted site access, unplanned downtime, or backlogs in critical maintenance activities. Financial impacts can arise from production losses, increased mitigation costs, or disruptions caused by inspections, complaints, or community-driven work stoppages.	Own operations - Petrochemicals - Refining - Consumer Services - Circular Economy Services	- Short - Medium - Long

The list of identified impacts and risks can be divided into three groups which each requiring different approaches to assess and manage. Therefore, this chapter is divided into two subchapters 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 impacts on, and risks associated with local communities, primarily ones living adjacent to the company's operations.
- **Sub-chapter B** focuses on how MOL Group's policies and actions relate to its macro-level impacts, such as welfare of citizens, shared wealth and MOL Group's economic impact.

MOL Group also acknowledges potential negative impact associated with the upstream and downstream value chain as mentioned above. Mitigation of such negative impacts is possible through rigorous responsible procurement policies and operating a whistleblower system, as described in Chapters G1 and S1-C of this report. MOL Group – as laid out in the *Business Partner Code of Ethics* – expects all of its business partners to respect human rights during their operations and comply with its ethical norms. This section however focuses on policies, actions, and metrics related to impacts and risks within MOL Group's own operations, where the company has direct leverage.

## SUB-CHAPTER A: MANAGING IMPACTS AND RISKS RELATED TO LOCAL COMMUNITIES

### 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

#### General policy commitments & management responsibilities

MOL Group's principles related to the economic, environmental, and social development of local communities and respect of human rights are in line with international guidelines<sup>31</sup> and are outlined in section IV.6.2. of the *Code of Ethics and Business Conduct*, and in the *HSE Social Impact Policy*. These documents highlight MOL Group's commitments related to affected communities:

- ▶ Make a positive impact while eliminating negative impacts on the communities in which MOL Group operates, and on society in general.
- ▶ Continuously measure, evaluate and improve 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 MOL Group's operations.
- ▶ Promote a culture in which all MOL Group employees share these commitments and actively participate in initiatives that support local development.

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 prepares an Annual Report on Community Engagement and provides information for external reporting requirements.

#### Community engagement & grievance management

MOL Group has an integrated approach to community engagement, grievance management and remediation. *Manage Community Engagement and Grievances Process Description* requires identifying, assessing and remediating potential negative impacts and managing risks. This regulation provides the principles and practices of community engagement, 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-

<sup>31</sup> 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, and Modern Slavery Act 2015 ([Code of Ethics and Business Conduct](#), p.56).

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 sites such as refineries and drilling sites, engagement happens on a regular basis. In case of other operations, such as site openings or closures, 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.

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 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 2025, 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, MPK Tisza-site) operate 24/7 dispatcher services.
- ▶ Online platforms: Danube Refinery and Slovnaft Refinery also operate mobile applications that allow residents to submit concerns, receive updates, and access real-time information.
- ▶ Members of affected communities might also use the Group-level whistleblower system (SpeakUp!), as described in Chapter S1-C.

The Group-level regulation on the handling of grievances requires:

- ▶ Every claim has 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), informing the complainant 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 specifications, which are not covered by this regulation, will be regulated on the appropriate local level.
- ▶ Every incoming claim and its details are 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 Officers or the Group-level SpeakUp!, and appropriate actions will be taken (Further information can be found in Sub-chapter S1-C).

### Corporate social responsibility

Social responsibility is a key element of MOL Group's *Code of Ethics and Business Conduct*. Its 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.

The *Managing Corporate Giving Activities Process Description* defines Group-level processes for sponsorship, donation, and social investment to ensure successful, efficient, and transparent corporate giving. Key principles, published on the *MOL Sponsorship and Donation* page, underpin the corporate giving strategy and guarantee impactful, ethical, and sustainable contributions to society:

1. **Focus on Positive Social Impact:** Prioritize structured, goal-oriented programs that deliver significant social benefits, focusing on children, talent development, disadvantaged groups, local communities, health, culture, sports, and environmental protection.
2. **Professionalism and Ethical Standards:** All decisions follow 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. Partners are expected to respect core values, including human rights and the prevention of corruption and discrimination.
3. **Transparency and Accountability:** Maintaining clear, regulated processes, enforce transparency, and provide regular activity reports. Only programs with a transparent background are supported.
4. **Sustainability and Long-Term Value Creation:** Emphasising sustainability by integrating economic, social, and environmental considerations to maximize long-term benefits.
5. **Cross-Border Engagement:** Include all countries of operation, tailored to local opportunities, needs, and resources.
6. **Community Involvement:** Encourage initiatives requiring active community participation and ensure community interests are represented in decision-making.
7. **Promotion of Talent and Achievement:** Recognise and support young talents, ensuring funding reaches those most deserving and in need, based on professional evaluations.
8. **Focus on Practical Outcomes:** Favouring action-oriented programs over events or conferences, limiting the latter to 20% of total sponsorship activities.
9. **Support for Local Communities:** Prioritising initiatives benefiting communities within MOL Group's operational areas.
10. **Non-Discrimination and Ethical Standards:** Refraining from supporting religious organizations, political activities, or any initiative conflicting with human rights, public morals, or ethical standards.
11. **Maximizing Efficiency and Synergies:** Concentrate resources on fewer, high-impact projects to ensure efficient use and greater effectiveness.
12. **Tax Efficiency:** Give priority to programs aligning with financial strategy.
13. **Preparedness and Planning:** Consider only requests submitted at least three months in advance to allow thorough evaluation and synergy exploration.
14. **Conflict of Interest Prevention:** No direct financial support to shareholders or employees to prevent conflicts of interest.
15. **Recognition of Quality and Excellence:** Supporting initiatives symbolizing quality and persistence, reflecting the ethos of achieving exceptional results through dedication.
16. **Incubator Effect:** Prioritizing projects requiring initial support to ensure long-term sustainability once established.
17. **Corporate Responsibility and Profitability:** Linking giving activities to corporate profitability, committing to allocate 1% of MOL Group's average net business result over the past three years to such initiatives.
18. **Ethical Use of Resources:** Prefer in-kind support aligning with operational strengths.
19. **Merit-Based Selection:** Select programs primarily through open competitions and review 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 *Community Engagement Methodology Guide*, 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 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

### Community engagement & grievance management

Members of the public and representatives of impacted groups expect to be informed, consulted, and involved in MOL Group's decision-making processes. 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 actions is ensuring that community engagement practice including grievance mechanism and trainings is implemented in 100% of major operations, and that complaints are minimised and operational hindrances are avoided. Recent actions related to community engagement efforts and grievance management across key locations are listed below:

#### Danube Refinery

- ▶ Incoming grievances increased versus 2024, largely via the Hello DUFI mobile application, reflecting higher adoption and easier reporting by residents rather than new odour sources. The app's user base grew in 2025 (iOS users increased by 470, Android users by 683), enabling residents to submit concerns and receive operational updates; municipal leaders encouraged its use to promote transparency.
- ▶ In parallel, multiple odour reduction projects were launched in 2025 to reduce odour sources and their impacts, addressing one of the most reported issues from the local community.
- ▶ To enhance transparency, MOL Group has enhanced continuous communication with local municipalities around Százhalombatta, fostering partnerships with residents and treating them as key stakeholders.
- ▶ During the AV3 unit fire incident, the refinery provided immediate, ongoing updates to the community and municipality.
- ▶ The sources of odours during normal operation have been identified. In order to eliminate these sources and minimize odour impacts, the management of the Danube Refinery has launched several projects, which are currently ongoing – among other things:
  - Eliminating open structures in the wastewater treatment system,
  - Collecting and treating gases escaping from tank vents,
  - Installing desalination equipment to reduce odour-causing components of industrial wastewater resulting from various technologies,
  - Using odour-binding chemicals at the wastewater treatment plant as a temporary measure.

In addition, equipment leaks detected during normal operation are repaired immediately, where feasible. Expected outcomes of the above actions:

- ▶ More transparent, user friendly channel for grievance submission.
- ▶ Better, two-way communication channels via the mobile app.
- ▶ Reduction of odour-related emissions through targeted projects.

#### Tisza-site (MPC)

- ▶ MOL Group held awareness-raising classes in local secondary schools about MOL's operations and, in particular, the waste management process.
- ▶ A publication was prepared on the status report of the remediation projects affecting the population, which was distributed to the residents. MOL Group organized an open day for the population on one occasion.
- ▶ A call center was established and a complaint reporting and handling policy was issued.

#### Hungarian Upstream

No grievances were recorded in 2025. For one drilling site located ~400 m from residences, concerns raised at announcement were addressed with the mayor's active involvement and regular updates, alongside measures to minimize light and noise during drilling.

#### Zala Refinery

Three odour complaints were received in 2024 and none in 2025, following a multi-year (2010–2019) odour-reduction programme (closing sewage treatment systems; closing drainage/industrial sewage/rail loading systems; closing bituminous storage; and closing sludge/leachate treatment systems) that managed to fully eliminate the odour-related grievances from the nearby residential area.

#### Bratislava Refinery

- ▶ In 2025, 59 grievances were recorded compared to 69 in the previous year. The elevated number of complaints was linked to two major turnarounds in 2024.
- ▶ Noise-related grievances are primarily linked to flaring, which, though infrequent, is perceived as highly disruptive.
- ▶ Slovnaft continued to provide regular, proactive, and transparent information to the public about refinery activities and related events. The company was active in communication on social media via its official profiles. In order to facilitate the use of complaint mechanisms, the Good Neighbour program was continued, which provided monthly preliminary updates to representatives of neighbouring city districts, and expanded communication through the Sused Slovnaft mobile app with current information on planned and extraordinary activities and their potential impacts. A well-established information process between the Communications Department and Dispatching is very important throughout the entire process.



- ▶ A best practice worth highlighting in 2025 is the continued development of the Good Neighbour grant program, which supports active citizens, strengthens local relationships in the Bratislava districts surrounding the Slovnaft Refinery, and fosters cooperation between municipalities, schools, and civic associations. Through this program, MOL Group supported several community oriented initiatives, including the Community Garden DVORY, the revitalization of the Petržalka Fortification Museum, and activities of the parish in Podunajské Biskupice, where the grant enabled the continuation of popular community wafermaking during the Christmas season. Beyond the grant program, Slovnaft also engaged directly with the public by participating in the Bratislava City Days and opening the refinery to the community through guided tours. In addition, Slovnaft continued close cooperation with local municipalities through corporate volunteering, with groups of Slovnaft employees assisting in community projects such as planting greenery and improving public spaces.
- ▶ 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 2025, a total of 11 grievances were received: 4 related to unpleasant odours, 2 to sea pollution, 4 to noise emissions, and 1 grievance concerning both odours and noise.
- ▶ Although this represents an increase compared to 2024, when 7 grievances were recorded (3 related to sea pollution, 3 to unpleasant odours, and 1 concerning both), four grievances in 2025 were related to a single operational disturbance at the end of August. This event was caused by a drop in external voltage in the power grid, resulting in the shutdown of several process units and a temporary increase in flaring, noise, and unpleasant odours.
- ▶ One sea pollution-related grievance was, after a thorough investigation, found to be unrelated to refinery operations. For the two air-related grievances, no exceedances of limit values were recorded at the measuring stations. An Air Quality Team was established to investigate possible causes.
- ▶ The number of sea-pollution-related grievances decreased compared to 2024 due to remedial activities, such as drilling new wells and extracting additional hydrocarbons from underground, which reduced hydrocarbon accumulation in the sea. To noise-related grievances, a FEL-1 document for noise reduction was prepared, including actions to be implemented in 2026, such as covering equipment at the most critical locations on process units.
- ▶ All grievances were managed in line with the Management of Grievances in Rijeka Refinery procedure. They were reported through the company's dispatch centre via email, phone, or other communication channels. All complaints are managed collaboratively by the Operations, HSE, and Corporate Communications departments to ensure timely investigation and resolution.
- ▶ To improve transparency and responsiveness, the refinery continued the practice of notifying the local 112 dispatch centre in advance of any planned activities that could result in increased emissions (smoke, noise, or odour).

#### Upstream Croatia

- ▶ In 2025, two HSE grievances and one non-HSE grievance were recorded, representing a decrease compared to 2024, when four HSE grievances and one non-HSE grievance were received. The reduction in 2025 was primarily due to lower activity levels, fewer projects, and reduced well workover operations near populated areas. All three grievances received in 2025 have been resolved.
- ▶ Actions implemented to reduce the number of grievances included regular communication with local communities regarding our activities.
- ▶ Exploration & Production has a local document, Managing Community Engagement and Complaints, which outlines the process for handling community complaints. Following the issuance of this document, all managers submit quarterly reports on grievances occurring at their locations, including their status (solved, ongoing, or closed) and comments, to the HSE department and Legal Senior Expert. This measure has helped reduce the number of grievances and improve the use of grievance mechanisms.
- ▶ There were no new solutions, projects, or actions directed toward local communities in 2025.

#### Sisak Site

In 2025, no complaints were recorded regarding the operations at the Sisak Site, primarily due to the reduced workload. In 2025, there were no new initiatives, projects, or actions directed toward local communities.

#### Upstream Pakistan

In 2025, 58 grievances were recorded across the operated areas. Compared to the full-year data for 2024, community-related grievances in 2025 show an increase, primarily due to the execution of two major projects:

- ▶ Makori Deep-3 Drilling Project: The project involved complex land ownership disputes between two villages and an ex-Provincial Minister. Despite these challenges, the well was successfully commissioned.
- ▶ Razgir-1 Wellhead Surface Facility & Flowline Project: The project required the installation of a 20+ km flowline from Razgir-1 (wellsite) to the Tolanj Processing Facility. This led to several grievances as local agricultural fields were affected, and a water channel along the route was also expected to be impacted. The presence of small landholdings increased the number

of landowners involved, adding complexity to land-related issues. Additionally, local and provincial political instability contributed to a higher number of community grievances during project execution.

To address the surge in grievances, local project-based staff were engaged to ensure rapid on-ground response and timely closure of issues raised by community members. The Community Complaints Management Register (CCMR) continued to serve as an effective tool for grievance resolution by enabling a collaborative approach supported by local government authorities and active involvement of relevant internal departments.

The “Project Execution Enablers” initiative under Community Development contributed to goodwill generation for MOL Pakistan’s operations and can be considered a best practice for future projects.

#### Waste Management Services

- ▶ The integration of MOHU into the Group’s grievance process is ongoing. MOHU’s customer service channels continue to record and report all received grievances. As the company’s activities have the characteristics of a public service with broad customer interaction, the majority of submissions relate to routine service issues, and only a limited number qualify as cases requiring escalation through the Group community grievance mechanism.
- ▶ Regarding the planned waste-to-energy (incinerator) project, inquiries arose via the Hello DUFI app (two questions on IPPC documentation) and during the online IPPC hearing (five submissions—one municipality, four individuals—with 34 questions on traffic, environmental impacts, and communication).
- ▶ The Mayor of Érd has raised the topic in social media in line with IPPC permitting. MOHU held personal meetings with mayors of surrounding towns (Érd, Ercsi) to provide transparency and accessibility throughout the process. The topic was also raised periodically in social media which is continuously monitored by MOHU in order to provide the latest available information.
- ▶ Waste-to Energy topic is raised periodically in social media, where Q/A kind of conversation develops between people. Social media is under monitoring continuously.
- ▶ From 2026 a new managerial position will be created to work on stakeholder management and keep in touch with the local communities as well as sustainability matters.

#### Retail operations

- ▶ There were no incoming grievances in 2025 in regards to the retail network and activities via MOL Group’s customer service channels.

#### Corporate social responsibility

In 2025, one of MOL Group’s most important Group level corporate social responsibility initiatives was the Green Belt Program, which exists in 7 countries to support local communities to create public green spaces. Since 2005 nearly 1,900 initiatives were supported, more than 3,2 million square meters of green areas were renewed, 349,165 trees, flowers and shrubs were planted at a value of more than EUR 5.89 million. Another important initiative is the Talent Support and Child Healing Program, which exists in 3 countries but will be extended to the Czech Republic and Poland in 2026. Since 2006 it helped more than 10,659 young people in the fields of sports, classical music and sciences for USD 5,984 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.

MOL Group collaborates with the Hungarian Food Bank Association. In 2025, this partnership saved more than 14.5 tonnes of surplus food from service stations, effectively preventing over 52.7 tonnes of CO<sub>2</sub> 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.

### TARGETS RELATED TO AFFECTED COMMUNITIES

/S3-5/

ESRS	Disclosure Requirement S3-5
GRI	GRI 3-3

#### Community engagement & grievance management

Since grievances are measured site by site, MOL Group has not implemented a formal Group-level target. Relevant information is disclosed in section *Community engagement & grievance management* of this chapter.

#### Corporate social responsibility

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 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 2025, MOL Group donated 1,105 million HUF in total in the form of cash, in-kind giving or leverage. The amount does not include sponsorships.

The MOL – New Europe Foundation was established in July 2021 by MOL and the Hungarian State as a new public interest asset management foundation performing public tasks. The Foundation supports developments in many areas and performs public interest tasks in the fields of talent support, sports, culture, social affairs and sustainability. In addition to the above, it has taken over a significant part of MOL's social responsibility activities.

MOL Group does not disclose any other target regarding reducing negative impacts and managing material risks and opportunities on affected communities.

## SUB-CHAPTER B: SHARED WEALTH AND ECONOMIC IMPACT

### POLICIES RELATED TO SHARED WEALTH AND ECONOMIC IMPACT

/S3-1; S3-2; S3-3/

MOL Group is dedicated towards contribution meaningful 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 Group's social responsibility, and the same high standard is expected from all business partners across the value chain. This commitment underscores the company'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 (further information on relevant disclosures can be found in Sub-chapter G1-A). By identifying social and societal needs, the company 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 its core values.

### ACTIONS RELATED TO SHARED WEALTH AND 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 Group operates, ensuring the funding of essential public services such as healthcare, education, and infrastructure. The scale and impact of these payments are detailed in the 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. MOL Group 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, the company's presence helps to reduce unemployment and create a stable foundation for economic development. Further information can be found 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.

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. Further information on Actions to manage impacts and risks related to affected local communities can be found in Sub-chapter S3-A.

## CONSUMERS AND END-USERS

/S4/

### IMPACTS AND OPPORTUNITIES RELATED TO CONSUMERS

/S4. SBM-3/

ESRS	Disclosure Requirement related to SBM-3
------	---

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. 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. MOL Group considers its core consumers base "people on-the-go", rather than only end-users of our fuel and other oil products.

Since 2023, MOL Group provides waste management services to both businesses and consumers. Consumers engage with the Circular Economy Segment's operations through waste collection, recycling programs, and deposit-return systems for plastic, metal, and glass beverage containers. Following its entry into the waste management concession in Hungary, MOL Group consolidated more than 80 regional hotlines into a single nationwide contact center to handle consumer inquiries and complaints efficiently.

The customers of MOL Group's other business segments typically purchase products and services for their own business operations. As a result, these segments have only an indirect impact on consumers, through the activities of actors in the downstream value chains—i.e., companies that buy products from MOL Group.

MOL Group's 2025 double materiality assessment covered all of these aspects. MOL Group operates customer support services covering all offered products and services, as described in the section *Policies related to consumers and end-users* below. Information on key concerns and issues raised via these systems is channelled into the Group-level risk management processes and the double materiality assessment. Assessment of impacts related to the downstream value chain relied on publicly available information from key business partners and external databases, as well as ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

Material IROs related to consumers and end-users are listed in the table below:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Supply of critical products (fuel, electricity, convenience products)	MOL Group is a key supplier of fuel, electricity, and convenience products across the CEE region, serving both wholesale and retail customers. With around 2,300 service stations, including electric charging points, the company ensures year-round access to essential products—even in remote areas—supporting energy security and community resilience.	Own operations - Consumer Services	- Short term - Medium term - Long term
Actual positive impact	Providing sustainable mobility services	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 ~600 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).	Own operations - Consumer Services	- Short term - Medium term - Long term
Potential negative impact	Product safety and quality issues in the downstream value chain	Consumers can be directly affected by product safety and quality issues in MOL Group's downstream value chain. Potential material impacts are relevant in fuel retail, where contamination during storage or transport, improper blending of additives, or logistical failures can compromise product integrity.	Downstream value chain	- Short term - Medium term - Long term
Opportunity	E-charging network	Investments in e-charging infrastructure development -in synergies with the existing service station network- provides opportunity to enter a growing market, while supporting the growth of electric vehicles & contributes to GHG abatement in the transportation sector.	Own operations - Consumer Services	- Short term - Medium term - Long term
Opportunity	Strengthening Customer Loyalty Through Access to Sustainable Products and Services	MOL Group has the opportunity to enhance customer loyalty by offering a wider range of sustainable third-party products and services through its retail network. By making environmentally responsible choices more accessible, the company can meet evolving consumer expectations and position itself as a trusted, sustainability-conscious brand.	Own operations - Consumer Services	- Short term - Medium term - Long term
Opportunity	Building Customer Trust Through Transparent Communication of Sustainability Practices	MOL Group has the opportunity to strengthen customer trust by clearly and consistently communicating its sustainability efforts. By sharing transparent, accessible, and verifiable information about environmental and social practices, the company can enhance its reputation, meet stakeholder expectations, and differentiate itself in a market increasingly driven by responsible consumer choices.	Own operations - Consumer Services - Circular Economy Services - Midstream	- Short term - Medium term - Long term

By analysing the characteristics of MOL Group retail, mobility and circular-economy operations, several groups of consumers and end-users may be subject to material impacts through MOL Group's own operations or its downstream value chain. In line with ESRS 2 SBM-3 requirements, these groups fall into the categories listed below:

- ▶ **Consumers of products that are inherently harmful to people or increase risks of chronic disease:** MOL Group sells motor fuels and certain petroleum-based products whose combustion contributes to air pollution and chronic-disease risk at the societal level. Although MOL does not produce consumer-grade chemicals or household toxic products, fuels qualify as products with inherent health externalities when misused or inhaled, and their lifecycle emissions indirectly contribute to respiratory diseases. These impacts are relevant at societal level rather than through direct consumer harm at service stations.
- ▶ **Consumers and end-users of services with potential privacy-related impacts:** MOL's digital customer-facing services—MOL Move loyalty programme (4.5M active users), MOL Plugsee EV-charging app, MOL Limo car-sharing platform—process personal data such as geolocation, mobility patterns, purchase behaviour and charging history. As such services involve handling of user data, they can pose potential privacy and data-protection risks. These risks remain non-material from an impact standpoint today because MOL applies GDPR-compliant data-protection frameworks, but the consumer group is nevertheless included for completeness.
- ▶ **Consumers reliant on accurate and accessible product- or service-related information:** Several consumer groups depend on clear, accurate product information to avoid damaging use:
  - Fuel consumers, who rely on correct labelling of fuel grades, ethanol content, additives and safe-handling instructions.
  - EV-charging customers, who depend on real-time charger availability and correct information on charging capacity and pricing.
  - Users of mobility services (MOL Limo), who rely on accurate instructions for safe vehicle or bicycle use.
- ▶ **Consumers who may be particularly vulnerable to health, privacy, or marketing-related impacts:** MOL Group's widespread CEE retail presence (approx. 2,300+ stations) means its consumer base includes individuals potentially vulnerable due to age, income or digital literacy. While no material negative impact was identified in relation to these groups, they are considered in MOL's consumer-engagement practices, service-design activities and data-protection controls. These consumer groups include:
  - Children and young people exposed to food, drink and mobility-service marketing at service stations.
  - Financially vulnerable consumers, relying on transparent and non-misleading pricing for fuel, convenience goods and mobility services.
  - Digitally vulnerable consumers, who may not fully understand data processing practices when using loyalty programmes, apps or digital payment systems.
- ▶ **Consumers in the downstream value chains:** Based on the value chain assessment, product safety and quality issues affecting consumers of actors in MOL Group's downstream value chains are considered a potential negative impact.

Based on the 2025 double materiality assessment, no material, systematic negative impact directly affecting MOL Group's own consumers has been identified (which differs from negative impacts affecting the general public, as disclosed in Chapter S3 on affected communities). Product safety and quality issues affecting consumers in the downstream value chains are considered a material impact. MOL Group maintains rigorous policies to ensure the safety and quality of its own products, but it has limited ability to influence consumer-related impacts arising from the activities of downstream value chain actors. Consequently, no specific management actions or policies are disclosed for these impacts, as they fall outside MOL Group's operational control.

Positive material impacts identified include the steady supply of critical products—primarily fuels—as well as the provision of sustainable mobility services and circular economy services (disclosed in Chapter E5-C). These impacts primarily relate to customers of the Consumer Services segment: "people on-the-go," as described above.

No material risks have been identified that relate specifically to negative impacts or dependencies on consumers. However, it should be noted that market risks associated with shifting consumer preferences due to climate change—such as potential losses from lower demand for fossil-based fuel products—are considered material risks. Related disclosures are included in chapter E1 – Climate Change and Energy. Conversely, the growing consumer demand for more sustainable solutions creates new business opportunities for MOL Group. As a result, initiatives such as expanding the E-charging network, strengthening customer loyalty through access to sustainable products and services, and building customer trust through transparent communication of sustainability practices have been identified as material opportunities related to consumers.

As a conclusion, the topic *Consumers and end-users* is considered material from both impact and financial perspectives. This chapter focuses on how impacts on this core consumer base are managed and on opportunities related to the expanding mobility services offered by the company.



## POLICIES RELATED TO CONSUMERS AND END-USERS

/S4-1; S4-2; S4-3/

### General policy commitments & management responsibilities

In line with the business and sustainability strategy of MOL Group, the main policy objectives of the Consumer Services segment 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 of 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 Executive 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' relevant services by channelling them into local and operation specific Process Descriptions. Key policy goals are as follows:

- ▶ In fuel retail operations, a key priority is ensuring the availability of critical products and services, including fuel and convenience goods at all times and all locations. 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.
- ▶ Policies related to mobility services 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 promote the transition to a low-carbon economy 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. Sustainability is a cornerstone of MOL Group's operations, with the Consumer Services segment's commitment to contribute to conscious waste management, recycling and increased energy efficiency to support reaching MOL Group's carbon reduction goals.

### Human rights policy commitments relevant to consumers and end-users

MOL Group's human-rights commitments applicable to consumers and end-users can be found in MOL Group's Code of Ethics and Business Conduct, aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These principles guide MOL's approach to consumer health and safety, privacy, non-discrimination and responsible marketing, consistent with human-rights expectations. The Code of Ethics and Business Conduct sets expectations for respecting consumer rights across all countries of operation. The policy includes:

- ▶ Respect for consumer health and safety, supported by strict HSE standards at service stations, quality assurance processes, and fuel-quality testing.
- ▶ Right to privacy and protection of personal data, particularly in digital services such as MOL Move, Plugee and Limo. Data processing is governed by GDPR-aligned procedures, with safeguards to prevent misuse or unauthorised access.
- ▶ Right to non-discrimination and equitable access to essential mobility, retail and waste-collection services, including for vulnerable groups.
- ▶ Responsible marketing practices, avoiding misleading information and ensuring transparency in product pricing, fuel labelling and service terms.

### Consumer engagement

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 customers' 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 MOL Group's customers' behaviours on a monthly basis. This system is operating across eight countries, 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 the primary campaigns enabling continuous enhancement of their efficiency.

- ▶ Emphasizing MOL Group's commitment to quality, the company puts significant emphasis on ongoing product quality enhancement initiatives, facilitated by a series of rigorous product tests. For instance, the 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 loyal customers and respond promptly to their changing habits, MOL Group has implemented an internal research system (e.g. Rate My Shopping initiative targeted deep-dive questionnaires) to obtain rapid feedback from members of our loyalty programs. The continuous refinement of offerings and loyalty functionalities is 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 the CEE network.
- ▶ Regarding the handling of general consumer complaints, MOL Group does not have a unified policy. All retail stations are expected to operate their own system of handling consumer complaints following local legal requirements. In case a consumer's 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. The Group-level grievance mechanism process ensures that remediation is accessible, fair and consistent across MOL Group's operations. Further information on grievance mechanism and remediation procedures can be found in Chapter S1-C.

## ACTIONS RELATED TO CONSUMERS AND END-USERS

/S4-4/

In 2025, MOL Group continued to implement targeted actions to achieve business goals in line with the strategy and policy objectives, including measure to address the identified impacts and opportunities.

- ▶ **The retail segment** invested HUF 39,147 million in 2025, prioritising the delivery of critical products with superior quality and maintaining our service station network of around 2,300 locations across ten Central Eastern European countries, ensuring accessibility and reliability for millions of consumers daily. In 2025 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 development of our e-charging network.
- ▶ The mobility segment:
  - ▶ Electric charging network: In 2018, MOL Group launched MOL Plugee, a new EV charging brand under the Consumer Services division. By year end 2025, 296 MOL Plugee EV chargers were installed throughout the Group's service station network across the CEE region. In 2025, MOL Group installed eight ultra-fast and six AC charger solutions on five existing and on one new location in Hungary. MOL Group launched its application-based service in Hungary in 2020 and in Slovenia, Slovakia, the Czech Republic, Croatia and Romania in 2021. At the end of 2025, it enabled more than 80,000 registered Plugee users and other customers to have a seamless charging experience in six countries thanks to the European roaming activity, which was launched in 2024. Beside the European roaming, MOL Plugee launched a virtual fuel card for B2B partners which highly supports the electrification of the business sector. Energy consumption for all EV chargers in 2025 reached 2,900 MWh, saving a total of approximately 1,500 tonnes of CO<sub>2</sub>-eq.<sup>32</sup>
  - ▶ Car sharing: MOL Limo is the largest car-sharing service in Budapest with a fleet of more than 600 vehicles and over 140,000 registered users, based on internationally validated studies, thereby MOL Limo is supporting the UN's SDG 12 on Responsible Consumption. In 2025, MOL Limo launched its new rent-a-car service, expanding its mobility portfolio beyond traditional car sharing and supporting more flexible, ownership-free travel options. In the same year, Limo extended its presence beyond the capital and introduced its service in four major Hungarian cities (Debrecen, Győr, Székesfehérvár, and Szeged) where vehicles are available through dedicated Limo points located at local MOL service stations. In 2025, to motivate users for sustainable transportation solutions, every MOL Limo monthly subscription was 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.

<sup>32</sup>Calculation is not validated by any external party. Calculation is based on average EV consumption, running performance, carbon emission of gasoline and diesel, and the emissions of the Hungarian electricity mix. Saved emissions are calculated as the difference between the emissions of replaced conventional vehicles and the emissions related to electricity generation.

- ▶ **Fleet Management:** The average age of the managed fleet remained under four 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 the fleet solutions are ready to serve both electric, hybrid and ICE vehicles as well.
- ▶ 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 Solutions and Mercarius have established a joint holding company, MOL Mercarius, which became the second-largest player in the Hungarian fleet management market, managing more than 22,000 vehicles. This collaboration aligns with MOL Group's long-term strategy to strengthen its fleet management capabilities while promoting sustainable and efficient mobility solutions.

In 2025, MOL Group continued to enhance the "Rate My Shopping" initiative, a key consumer engagement programme with the aim to maintain high-quality service standards across the network of its 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 service stations into modern FMCG hubs.

Protection of the health and safety of MOL Group's customers visiting our service stations is an utmost priority. This is ensured by sustaining capabilities to provide assistance and first aid for those on their way.

## BUSINESS CONDUCT

### IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO BUSINESS CONDUCT

/G1. SBM-3, G1. IRO-1/

Ethical and transparent business conduct is essential for the MOL Group to maintain trust with investors, stakeholders, employees, customers, and suppliers. To ensure a principle-based, effective corporate governance, and to identify and manage associated risks, MOL Group has robust processes in place:

#### Ethical Business Conduct

- ▶ Fraudulent business conduct could have severe consequences for stakeholders and pose financial and reputational risks for the company. Risks related to fraud, corruption, and bribery are assessed through compliance risk reviews and internal audits. Allegations of unethical conduct are reported via accessible whistleblower channels. Ethics risk assessments are embedded in high-risk processes (e.g., M&A, trading, procurement) and supported by due diligence procedures.
- ▶ Operating in the heavily regulated environment such as the energy and waste management sectors, MOL Group is exposed to regulatory changes. The company actively participates in industry associations and public policy advocacy initiatives to represent its interests and those of its stakeholders, contributing to emerging regulatory frameworks that support the transition to a low-carbon, circular economy while upholding transparency and the highest ethical standards.

#### Sustainable Procurement

- ▶ MOL Group's operations rely on a diverse supplier base, which exposes the company to risk associated with supply chain disruptions. Associated risks are continuously evaluated based on supplier due diligence, performance monitoring, and grievance mechanisms.
- ▶ MOL Group plays a significant role in local economies by providing income to suppliers, including small enterprises that depend on timely and fair payments. Potential negative impacts on suppliers and associated risks are assessed through engagement surveys, grievance mechanisms, and monitoring of payment timeliness and disputes. These mechanisms enable consistent capture of performance signals, including payment timeliness and dispute patterns.
- ▶ As a major regional company, MOL Group's operations have indirect impacts on the people and environment through its downstream value chain. Assessment of governance-related impacts relies on supplier screening processes, as well as on publicly available information on business partners, external databases, and ESG scores generated using Moody's ESG Score Predictor via the ORBIS platform.

#### Cyber and Information Security

- ▶ Digital resilience is critical for MOL Group's governance framework. Protecting digital assets, data, and information from cybersecurity threats is addressed through robust governance mechanisms. Cybersecurity risks are assessed using threat modelling and vulnerability testing across IT systems. Potential impacts—such as data breaches affecting customers or partners—are prioritized based on severity and likelihood. Continuous monitoring is ensured through incident reporting systems and compliance with international security standards.

Issues identified through the above described procedures are channeled into Group-level risk management and the double materiality assessment. The methodology of the materiality assessment and stakeholder consultations are detailed in section ESRS 2 IRO-1 of this report. MOL Group's 2025 double materiality assessment identified the following governance related impacts, risks and opportunities:

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
Actual positive impact	Supply chain engagement / Responsible sourcing	MOL Group promotes responsible sourcing by encouraging higher environmental, social, and ethical standards across its value chain. Through supplier engagement and clear expectations, the company aims to reduce negative impacts, support fair labor practices, and ensure sustainable and transparent operations throughout its supplier network.	Own operations: Group-level	-Short term -Medium term -Long term
Potential negative impact	Dependency of suppliers	MOL Group recognizes that delayed payments can negatively affect suppliers, particularly small and medium-sized enterprises (SMEs) that may rely heavily on timely cash flow. The company aims to maintain fair and responsible payment practices across its supply chain to reduce financial strain and support supplier stability and resilience.	Own operations: Group-level	-Short term -Medium term -Long term
Potential negative impact	Potential data exposure	MOL Group collects and manages personal and business data from employees, partners, and customers. While strict data protection procedures are in place, risks remain from internal misuse or external cyber threats. Such incidents could lead to unauthorized exposure of sensitive information, despite compliance with regulations like GDPR and ongoing efforts to strengthen IT security.	Own operations - Consumer Services - Circular Economy Services - Midstream	-Short term -Medium term -Long term
Risk	Cybersecurity incidents	The growing frequency and sophistication of cyberattacks—such as ransomware, malware, and data breaches—may pose threat to business. Potential incidents can lead to operational disruptions, data loss, reputational harm - particularly when business sensitive or customer transactions are	Own operations: Group-level	-Short term -Medium term -Long term

IRO group	IRO title	Description	Relevancy in the value chain	Time horizons
		compromised. Financial impacts may include production losses, lost sales and margin, and substantial recovery and reinstatement costs.		
Risk	Supply chain disruption: unavailability of critical raw materials	Exposure to volatility in the availability and price of essential raw materials due to global competition, external shocks, import restrictions or natural resource depletion may impair continuity of operations or reduce production flexibility, in segments reliant on specific input materials. Financial consequences include input cost inflation, lost production volumes, or the need to make unplanned investments in alternative sourcing solutions.	Own operations: Group-level	-Short term -Medium term -Long term
Risk	Supply chain disruption: non-compliance of suppliers with ESG requirements	As ESG-related regulations (e.g., CSDDD, CBAM, EU Deforestation Regulation) gain enforcement momentum, the risk arises that suppliers and contractors may fail to meet evolving sustainability, human rights, or traceability requirements; or refuse to cooperate on sustainability matters (e.g., providing reports, reduce emissions). Such non-compliance delays and termination of procurement relationships increase the risk of reputational damage (e.g., ethical controversies, HSE incidents). Financial effects include loss of revenue due to delays, requalification and compliance failures costs, or loss of market access for non-compliant or non-certifiable products.	Own operations: Group-level	-Short term -Medium term -Long term
Risk	Fraud or misconduct leading to financial or reputational harm	Fraudulent behaviour, insider misconduct, or unethical commercial practices—such as bribery, embezzlement, or procurement irregularities—can compromise operational integrity and governance standards. These incidents may lead to stakeholder mistrust, loss of investor confidence, or internal investigations and disciplinary actions. Financial impacts include direct monetary loss and reputational harm that may constrain business opportunities or access to capital.	Own operations - Exploration & production - Petrochemicals - Refining - Circular Economy Services	-Short term -Medium term -Long term
Risk	Compliance with antitrust, consumer protection, merger control regulations or international sanctions	Compliance with laws on competition, consumer protection, merger control, or international trade sanctions might expose the company to business and operational constraints. Financial consequences may include: commercial constraints resulting from imposed restrictions or business loss.	Own operations - Exploration & production - Petrochemicals - Refining - Circular Economy Services - Midstream	-Short term -Medium term -Long term
Opportunity	Transparent collaboration with industry associations, public institutions & authorities	Engaging openly with industry bodies and public institutions offers opportunities to contribute to policy development, anticipate regulatory changes, and align on shared sustainability goals. Through active and transparent collaboration, companies can enhance credibility, gain early insights, and shape practical, industry-relevant solutions. This can result in smoother compliance processes, better stakeholder relationships, and reduced regulatory friction over time.	Own operations: Group-level	-Short term -Medium term -Long term

Mapping these material IROs to the topic list of ESRS AR 16, *corporate culture* (in relation to ethical business conduct), *prevention of incidents of corruption and bribery*, and *protection of whistle-blowers* are material from financial perspective due to the identified risks, as well as *political engagement* as collaboration with industry associations, public institutions and authorities has been assessed as an opportunity. *Management of relationships with suppliers* is considered material from both impact perspectives due to positive impact associated with responsible sourcing practices, and potential negative impact stemming from the dependency of suppliers, and the identified risks related to supply chain disruptions. Exposure of sensitive data has been identified as a potential negative impact, whilst cyber and data security is also a material financial risk for the company. To cover these aspects, *cyber and data security* is considered an entity-specific material topic for MOL Group discussed under this chapter.

Managing this diverse set of governance related impact, risks and opportunities requires different approaches, therefore the information on relevant policies, actions, targets and metrics are disclosed in three separate sub-chapters:

- **Sub-chapter A** describes MOL Group's approach to ethical business conduct, including fraud prevention and advocacy.
- **Sub-chapter B** describes MOL Group's approach to supply chain management, focusing on responsible procurement practices, impact on suppliers related to payment practices as well as risks stemming from ESG-related supply chain disruptions.
- **Sub-chapter C** describes MOL Group's cyber and information security approach.

## SUB-CHAPTER A: ETHICAL BUSINESS CONDUCT

### POLICIES RELATED TO ETHICAL 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 a "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 and risks. MOL Group prioritises

the establishment and reinforcement of its business conducts and corporate ethics management system. The key principles of this system are laid out in the Code of Ethics and Business Conduct:

### 1. 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 its 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.

### 2. 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, even if 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 its entire value chain, within our social patronage, charity and sponsorship fields, the company is 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.

MOL Group's policy on anti-corruption and anti-fraud is based on external guidelines such as UK Bribery Act 2010, U.S. Foreign Corrupt Practices Act, and the Partnering Against Corruption Initiative Global Principles for Countering Corruption. The aforementioned guidelines are in line with the United Nations Convention against Corruption.

### 3. 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.

### 4. 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.

Further information can be found in 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.

MOL Group also has stringent expectations for its partners, including suppliers, service station operators, joint ventures, and sponsors, urging them to align with the principles in 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* 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 was 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 Security organizations to investigate. Further information can be found in Sub-chapter S1-C on Policies related to grievances and remediation.

- ▶ **Defined Responsibilities:** Group Anti-Fraud and Group Investigation organizations operate Anti-Fraud and Internal Investigation systems of MOL Group in line with the annual fraud risk assessment plan and annual investigation plan, approved by senior management. Internal Investigation and Anti-Fraud Teams conduct high priority, highly sensitive investigations and fraud risk assessments as a group service to prevent, detect and deter fraudulent or illegal criminal activities and protect the company from such risks. Group Anti-Fraud Team and Group Investigation Team manage, supervise and operate MOL Group's Anti-Fraud and Internal Investigation frameworks and directly control the investigation of local complex cases and local risk assessments. Complex investigations and risk assessments 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 Teams and Local Investigation Teams run risk assessments and internal investigations 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. All security personnel employed by MOL Group companies are obliged to carry out the given investigations, assessments without any kind of bias. In case a potential conflict of interest arises during an investigation or assessment the Group Security Director and Country Security Manager shall be informed immediately in writing. This process ensures that the personnel carrying out the investigation or assessment is separate from the chain of management involved in the matter.
- ▶ **Unbiased and Independent Investigations:** Investigations and fraud risk assessments must be conducted without bias. In cases of potential conflicts of interest, the Group Security Director and Country Security Manager are immediately informed. Investigation and Anti-Fraud experts are required to maintain neutrality and professionalism throughout the process.
- ▶ **Proportionality and Due Diligence:** Investigation and Anti-Fraud 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, risk assessments 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 or risk assessment. Investigation and risk assessment findings are shared only with individuals who have a legitimate need to know, in compliance with data protection laws. Personal data obtained during investigations and risk assessments is processed 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 or assessment.
- ▶ **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 Teams and 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. The Director of Group Security regularly submits reports to C-suite officers and provides an annual status report on Security and Anti-Fraud topics to the Supervisory Board.

## 5. Commitment and Controls to Managing Conflicts of Interest

MOL Group is committed to upholding the highest standards of integrity and transparency by proactively identifying, managing, and eliminating conflicts of interest across its operations. The Group's policy, as set out in the *Conflict of Interest Regulation*, applies to all employees and executive staff within MOL Plc. and its controlled subsidiaries. Qualitatively, the policy defines a conflict of interest as any relationship, activity, or interest that could unduly influence an employee's professional decisions or appear to do so. The regulation mandates strict separation of personal and professional interests, prohibits employees from engaging in business activities or relationships that overlap with MOL Group's interests, and requires full disclosure of any potential conflicts, including those involving relatives or external business associations. The process is supported by the Digital COFI system in Hungary, and under implementation in Croatia and Slovakia, which ensures secure, transparent, and traceable declarations and assessments, reinforcing MOL Group's commitment to ethical conduct and the protection of justified business interests.

MOL Group's conflict of interest policy is underpinned by robust quantitative objectives and controls designed to ensure compliance and accountability. All employees are required to submit conflict of interest declarations upon hiring, contract amendments, or any change in circumstances that may give rise to a conflict. The Digital COFI system automates notifications, tracks compliance deadlines, and stores declarations and management decisions in a secure database. Managers are responsible for evaluating declarations within five working days and periodically reviewing their completeness and accuracy. COFI Investigations are conducted within a maximum of 30 days, and all actions and outcomes are recorded for audit purposes. These quantitative measures ensure that conflicts are systematically identified, assessed, and resolved, supporting MOL Group's sustainability objectives and fostering a culture of trust and accountability.



## ACTIONS RELATED TO PREVENTION OF CORRUPTION AND 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 2025:

- ▶ 95% of MOL Group employees successfully completed the annual ethics training, which includes dedicated content on anti-corruption. Additionally, the Board of Directors and the Supervisory Board received their required training during meetings.
- ▶ MOL Group's Anti-Fraud Team issued ad-hoc 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 criminal 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 challenged the agency's decision in court.
- ▶ No fine was 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 2025.

## POLICIES RELATED TO ADVOCACY

/G1-5/

ESRS	Disclosure Requirement G1-5
GRI	GRI 2-9-b GRI 415-1

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'.

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.

## ACTIONS RELATED TO ADVOCACY

In alignment with the above listed principles, MOL Group did not make any direct or in-kind political contributions in 2025.

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 2025 (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 monitors EU and national regulations aimed at achieving climate-related targets, reducing CO<sub>2</sub> emissions, and promoting circular economy and renewable energy generation. The company recognizes the critical role of industrial transformation in meeting the EU's ambitious climate goals and is 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.

MOL Group supports the EU's overarching climate objectives, and is transforming its operations to comply with the requirements of the Fit-for-55 package, 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. The 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, MOL Group advocates for the inclusion of all low-carbon technologies, greater flexibility, and a phased approach to compliance. Key areas of its efforts include creating regulatory conditions for hydrogen and biomethane adoption in transport and promoting energy savings through a broad range of technologies, as well as the considerations of national specificities in circular economy policies.

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 and the International Public Affairs departments** and adheres to strict ethical standards. In 2025, MOL Group's total spending on membership fees for EU, international, and national associations amounted to USD 2,214,005, with the following breakdown:

1. **National Associations:** USD 997,279, covering topics such as employer rights, product categories (chemicals, fuels), transport, infrastructure, and energy efficiency.
2. **EU and International Associations:** USD 1,216,726 in 2025, covering associations within the oil & gas and petrochemical industries, addressing topics such as decarbonization, low-carbon fuels, and chemical products. The three most significant associations include FuelsEurope and Concawe, CEFIC, and IOGP, focusing on 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 climate neutrality objective by 2050, the creation of a conducive investment framework for investments in the industrial and energy transition, and policies that create market demand for low-carbon liquid fuels. The association is advocating for the acknowledgement of the refining industry as strategic for European fuel and chemical feedstock supply throughout and beyond the transition.
  2. **IOGP:** Supports the climate neutrality objective by 2050, focuses on methane emissions reduction, platform electrification, the role of gas supporting the integration of renewable energy and energy supply security, and advocates for policies conducive for carbon capture and storage (CCS) and blue hydrogen investments.
  3. **CEFIC:** Supports climate neutrality objective by 2050 and advocates for enabling policies for investments in industrial decarbonisation and circularity. Key initiatives include bio-based and circular solutions, chemical recycling, and climate-neutral product markets. The association advocates for the acknowledgement of the chemicals industry as fundamental for the survival of most other European industries and calls for an improved competitive environment that allows its survival and prosperity.

MOL Group is also registered in the EU Transparency Register (REG number: 08569166274-90).

#### Board members holding position in public administration

In 2025, no new member of the Board of Directors has been appointed. In the Supervisory Board:

- ▶ Norbert Izer resigned from his position with an effective date of 24 June 2025.
- ▶ The employee delegate position of Kálmán Serfőző has been terminated as a result of the termination of his employment and Csaba Szabó has been elected as member from 28 November 2025.

There have been two members in the mentioned boards who are holding, or have in the last 2 years held positions in public administration:

- ▶ Zsigmond Járai has been serving as a member of the Board of Directors since 29 April, 2010 and the Chairman of the Finance and Risk Management Committee from 4 June, 2010. He is the Prime Ministerial Commissioner responsible for co-ordinating the Csángó-Hungarian co-operation.
- ▶ Norbert Izer served as a member of the Supervisory Board and the Audit Committee of MOL Group from July 15, 2022 until his resignation. He led the State Secretariat for Taxation within the Ministry of Finance from May 2018 until 31 December 2024. Since March 2025 he has been active as director responsible for financial markets and digitalisation at the Hungarian National Bank.

#### 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

### POLICIES RELATED TO SUPPLY CHAIN MANAGEMENT

/G1-2/

#### General policy commitments & management responsibilities

Sustainability is a core element of MOL Group's procurement strategy, embedded in day-to-day operations and long-term objectives. The *Responsible Procurement Policy* and *Code of Responsible Procurement* articulate the Group's commitment to integrating economic, environmental, and social considerations into all procurement decisions. These commitments are aligned with MOL Group's Shape Tomorrow Strategy, aiming to position the company as a leader in the low-carbon, circular economy in Central and Eastern Europe.

The *Supplier Lifecycle Management* framework governs supplier qualification, supplier evaluation & selection, performance evaluation, and relationship management. Executive accountability for sustainable procurement resides with the Chief Procurement Officer, who is also the process owner of MOL Group's *Non-HC Procurement Area Book*. All procurement professionals and business partners are required to share the Group's sustainable values and principles and to be aware of and adhere to the Responsible Procurement framework, which is regularly communicated and updated.

#### Responsible sourcing

MOL Group promotes responsible sourcing by setting clear expectations for suppliers regarding environmental stewardship, human rights, and ethical business conduct. The *Responsible Procurement Policy* includes a statement on green procurement and commits to considering suppliers' environmental and social performance in procurement decision-making. The *Business Partner Code of Ethics* is a mandatory element of supplier contracts, and requires all business partners to uphold values such as law-abiding behaviour, integrity, fairness, respect, and accountability. Suppliers must comply with all relevant laws and regulations, respect human rights, and avoid unfair labour practices, including forced, bonded, or child labour.

Procurement processes include pre-screening and qualification of suppliers based on financial, legal, health and safety, environmental, and sustainability criteria, as well as ethical due diligence to prevent corruption, money laundering, and other non-compliant behaviours. Sustainability assessments, including questionnaires and scorecards, are integrated into supplier selection and contract award processes. These systems include automated risk assessment based on legal, ethical, financial, health and safety, and environmental data. The sustainability questionnaire categorizes suppliers into risk levels and supports the definition of corrective action plans or KPIs for sustainability topics.

All new suppliers must accept and act according to the *Code of Responsible Procurement*, making it part of the contractual relationship. Suppliers are expected to transparently share their sustainability practices, targets, and performance data, and to cascade these requirements throughout their own supply chains. MOL Group actively collaborates with suppliers to improve their environmental performance and supports them in developing their own sustainability processes. Contractor post-evaluation and regular monitoring inform future cooperation and continuous improvement.

Group Procurement also conducts preliminary ESG risk assessments for contracted suppliers, using Moody's ESG Score predictor as a baseline for evaluating supplier risk exposure. This score provides an initial estimate of a supplier's ESG performance based on publicly available data, industry benchmarks, and geographic risk factors. These inputs determine the company's exposure to ESG risks and opportunities, as well as the level of management applied to address them. Suppliers identified as high-risk will undergo an ESG due diligence process. The preliminary risk assessment is conducted semi-annually and covers all contracted suppliers across the group. The scope of the assessment includes suppliers from both HC and non-HC procurement categories, ensuring comprehensive coverage of ESG risks across all relevant sourcing activities.

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.

MOL Group's procurement processes are compliant with ISO 50001:2018 (energy management system), and total cost of ownership (TCO) is considered in supplier evaluation, with energy-efficient solutions promoted. The origin of assets/materials is also taken into account during supplier selection.

#### **Management of relationships with suppliers**

MOL Group recognizes the importance of maintaining fair and responsible relationships with all suppliers, with particular attention to small and medium-sized enterprises (SMEs). The Group is committed to timely payments and transparent communication, reducing financial strain and supporting supplier stability and resilience. The procurement organization ensures equal treatment and fair competition through a group-wide sourcing system, which facilitates traceability and accountability.

#### **Management of supply chain disruptions**

MOL Group proactively manages financial and operational risks related to supply chain disruptions through a comprehensive risk identification and management framework. This includes diversifying sourcing channels, maintaining strategic inventories, and integrating sustainability requirements into supplier contracts. The Group monitors global market trends and regulatory developments—such as the CSDDD, CBAM, and EU Deforestation Regulation—to anticipate compliance challenges and prevent interruptions caused by non-conforming suppliers.

Contingency planning addresses potential shortages of critical raw materials and price volatility, ensuring continuity of operations and production flexibility. To mitigate this risk, MOL Group conducts supplier capability assessments prior to contract award and alternative suppliers have been identified for certain critical scopes in order to ensure business continuity and safeguard the availability of essential competences. In addition, to strengthen collaboration and prepare suppliers for future challenges, Group Procurement organizes an annual Innovation Day that provides suppliers with early insight into upcoming projects and strategic priorities. Sharing future challenges and opportunities enable suppliers to align their capabilities, anticipate requirements, and jointly develop solutions that enhance resilience and competitiveness across the value chain.

Non-compliance with ESG requirements or rejection of the Responsible Procurement Policy will trigger ESG due diligence and corrective measures for the supplier.

### **ACTIONS RELATED TO SUPPLY CHAIN MANAGEMENT**

In 2025, the Company strengthened its supply chain sustainability performance through a series of targeted actions implemented in close cooperation with key suppliers. These initiatives focused on reducing environmental impacts, enhancing responsible business conduct, and improving health and safety standards across the value chain. A major achievement was the supplier-led installation of solar photovoltaic systems and battery storage solutions at selected sites, following a full technical assessment and execution carried out by our energy technology partners. This project contributes to long-term decarbonisation and energy efficiency while demonstrating the strategic role of suppliers in delivering climate-positive outcomes.

To reinforce responsible sourcing practices, we updated our Supplier Code of Conduct, integrating enhanced environmental, social and ethical requirements aligned with international standards. The updated Code will be communicated to all suppliers, ensuring clearer expectations regarding emissions management, labour rights, circular economy, environmental management and grievance mechanisms. In parallel, we conducted targeted HSE audits among high-risk suppliers to identify actual and potential impacts related to worker safety and environmental compliance. These audits resulted in corrective action plans jointly developed with suppliers, supporting continuous improvement and risk mitigation. Furthermore, we strengthened our supply chain sustainability practices by updating the Supplier

Qualification questionnaire to ensure compliance with the Hungarian ESG law, assessing EUDR and CBAM exposure across our supplier base, and evaluating market solutions to enhance future Scope 3 measurement capabilities.

Additionally, we launched a supplier innovation programme aimed at generating sustainability-focused solutions directly from our supply base. Through this initiative, suppliers submitted proposals such as a new cooling unit technology at our service stations that significantly reduces energy consumption, or a pilot project for the reuse of discarded protective clothing, supporting circularity and waste reduction. We also organised a Supplier Innovation Day to share our sustainability strategy and challenges, encouraging suppliers to contribute to both their own and our supply chain's decarbonisation efforts. Across all actions, suppliers played an active role in execution, monitoring and impact delivery, reflecting our commitment to collaborative value creation and a more resilient, responsible supply chain.

Supply chain actions	Implementation time horizon	Sustainability impact	Current status
Update Supplier Code of Conduct	Q4 2025 - Q1 2026	Strengthens responsible sourcing standards, improves supplier ESG compliance, and reduces social and environmental risks in the supply chain.	Completed - pending system implementation
Assess EUDR and CBAM exposure in the supply chain	Q3 2025 - Q2 2026	Enhances transparency on deforestation-free sourcing and carbon-intensive imports, supports regulatory compliance, and reduces environmental and climate-related risks.	Continuous
Assess market solutions to improve Scope 3 measurement	Q3 2025	Improves accuracy of value-chain emissions data, enables targeted decarbonization actions, and supports long-term net-zero strategy.	Market assessment completed
HSE audits and corrective action plan	Continuous	Strengthens supplier environmental and safety performance, reduces operational risks and ensures alignment with corporate HSE standards.	Continuous
Supplier Qualification questionnaires update to comply with ESG law HU	Q1 2025 - Q3 2025	Ensures legal compliance, improves supplier ESG screening, and strengthens overall supply-chain sustainability performance.	Completed
Li-ion battery energy storage system development (Algyő) - supplier led	Q1 2025 - Q1 2026	Reduced emissions, improved energy efficiency, enhanced operational resilience	Under construction
Li-ion battery energy storage system development (Tiszaújváros) - supplier led	Q1 2025 - Q1 2026	Reduced emissions, improved energy efficiency, enhanced operational resilience	Under construction
Solar power plant development (Tiszaújváros) - supplier led	Q3 2024 - Q2 2026	Increased renewable energy generation, reduced Scope 2 emissions, long-term energy cost reduction	Under construction
Solar power plant development (Algyő) - supplier led	Q3 2024 - Q2 2026	Increased renewable energy generation, reduced Scope 2 emissions, long-term energy cost reduction	Under construction
Cooling equipment tender – focusing on the procurement of decreased energy consumption units at service stations	Q3 2024 - Q2 2025	Reduce carbon footprint via decreased energy consumption: 9,5 million kWh per year (all countries)	Completed

## 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 2025, 94% of invoices were paid within this timeframe. The average time to pay an invoice from its reception was 38 days. This figure was derived using a representative sampling methodology, covering entities accounting for approximately 80% of total consolidated net revenue. Payments were selected based on invoices where both the document date and due date fell between January 1, 2025, and December 31, 2025. 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.

## METRICS AND TARGETS RELATED TO SUSTAINABLE PROCUREMENT PRACTICES

/entity-specific/

The Group has set both qualitative objectives and quantitative targets for both supplier social practices and supplier environmental practices as part of its Shape Tomorrow strategy, including a target of 30% GHG emission reduction in inbound supply chain by 2030. This target covers the upstream Scope 3 emissions associated with suppliers belonging to the non-hydrocarbon segment of MOL Group's supply chain, managed by the Group Procurement department. The 30% reduction target is an absolute and measurable objective. It is based on the Group's decarbonization ambitions and on an assessment of procurement categories carried out by Group Procurement leadership. While the target is not science-based, its formulation reflected the expectation that, over time, suppliers will be increasingly capable of providing accurate GHG emission data and implementing emission-reduction measures aligned with MOL Group's green transition objectives. The baseline year is 2019, and a value of 587,008 tCO<sub>2</sub>e, that has been estimated by spend-based methodology, in cooperation with an external service provider. Although no formal interim targets were defined for the 2019–2030 period, performance against the target is evaluated on an annual basis. Currently, the progress tracking is on hold, as there is an ongoing tendering process, with the purpose of replacing the existing service provider's software to a more advanced tool, expected to provide a new activity-based calculation method for the sake of significantly improved data accuracy and Scope 3 results. Internal stakeholders include key Group Procurement personnel, the Group ESG team and the Responsible Procurement team that oversees the Scope 3 calculation process and coordinates supplier engagement activities, particularly involving top-emitting suppliers, who serve as external stakeholders in the achievement of the target.

SUSTAINABLE PROCUREMENT PRACTICES	UNIT OF MEASURE	2025	2024	ESRS
Targeted suppliers assessed on sustainability	%	42.67	-	-
Buyers who received training on sustainable procurement	%	33.06	-	-

#### Metrics – Targeted suppliers that have gone through a sustainability assessment

The calculation is based on one of Group Procurement's PowerBI dashboards, the Supplier Dashboard that is monitoring the number of qualified suppliers. There were 1,725 partners identified as qualified suppliers, meaning that they filled out the necessary sustainable procurement questionnaire (Environment and Ethics) in the SAP Ariba management platform and that these have been approved by MOL Group responsible persons. This was proportioned to the total number of contracted suppliers, taking into account those exempted from qualification (4,043 partners in total), resulting in a final value of 42.67%.

There was no additional external assurance provider who validated this calculation outside this sustainability statement.

#### Metrics - Buyers who have received training on sustainable procurement

It is an important objective of the Responsible Procurement organization that the employees of the Group Procurement organization shall be well-informed about sustainability objectives, highlighted topics where they have an effect during their everyday work, currently relevant regulations and best practices to support supply chain decarbonization. While the mandatory yearly group level training has been postponed to 2026, employees had the opportunity to attend online trainings about sustainable procurement in general and also specific topics such as scope 3 emissions, energy saving, supply chain due diligence or CBAM regulation.

For the calculation, the attendee lists have been gathered from all the sustainable procurement trainings, duplications have been removed and the number of participants (119 employees) was proportioned to the Group Procurement organization's total headcount of 360 employees, resulting in a final value of 33.06%.

There was no additional external assurance provider who validated this calculation outside this sustainability statement.

## SUB-CHAPTER C: DATA PROTECTION AND CYBER SECURITY

### POLICIES ON DATA PROTECTION AND CYBER SECURITY

/entity-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. 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](mailto: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. 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 defence 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.

In accordance with the *Cyber Security Awareness Regulation*, MOL Group is committed to maintaining a robust cybersecurity culture across all levels of the organization. To this end, the company conducts regular, mandatory cybersecurity awareness trainings for employees, which are periodically reviewed and updated to address emerging threats and evolving best practices. These trainings are delivered through e-learning modules and live sessions, ensuring that all staff are equipped with the knowledge and skills necessary to recognize and respond to cyber risks. New employees receive dedicated cybersecurity awareness training as part of their onboarding process, reinforcing the importance of secure and compliant behaviour from day one.

In addition to ongoing education, MOL Group proactively organizes simulated cyberattack exercises, such as phishing campaigns and other social engineering scenarios, to test and strengthen the organization's resilience against cyber threats. The results of these simulations are analysed to identify areas for improvement and to inform further awareness initiatives. This comprehensive approach ensures that employees are not only informed but also practically prepared to address and mitigate risks related to cyberattacks, supporting MOL Group's commitment to responsible and sustainable business operations.

## Expectations towards business partners



MOL Group is committed to fostering data protection and cyber security throughout its value chain. Therefore, all types 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 AND CYBER SECURITY

/entity-specific/

In 2025 there was no major incident in MOL Group, due to continuous hardening activities that are extended into 2026.

In 2025 the biggest issues were scam attempts and low-level cybercrime activities - the trend that is true for the whole Central-European region. In case of MOL Group there were no major Cyber Security Incidents, thanks to the hardening activities from the previous year - which were continued in 2025 and will continue in 2026.

Utilization of AI for phishing attacks and scams became widespread and MOL was also a target of several regional phishing campaigns – however, due to the email protection suite these were mitigated on time and no loss of data and credentials were recorded. MOL sees that criminals became proficient in the usage of agentic AI for attacks, the campaigns are way sophisticated - however the aim for these operations changed, besides credential harvesting, crypto scams are getting more common. These campaigns - again - are targeting the general populace and not MOL Group specifically. In 2025 MOL has recorded a record number of scam sites using MOL assets and multiple scam sites were taken down.

## TARGETS AND METRICS RELATED TO CYBER SECURITY

/entity-specific/

MOL Group is committed to ensuring full compliance with all applicable data protection and cyber security (NIS2) 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 12 (7 at MOL and 5 at MOHU) substantiated complaints received concerning breaches of customer privacy in 2025. All of the incidents were breaches of confidentiality. In the risk assessment processes carried out based on our internal regulation, the majority of data breaches were classified as low-risk breaches. The Data Protection Officer decided that one of the breaches reached the level of risk that required a report to the National Authority for Data Protection and Freedom of Information (NAIH) in view of our internal policies and the applicable legislation.

### Cyber Security

In 2025 there were no major incidents in MOL Group, due to continuous hardening activities and awareness campaigns that are extended into 2026.



## APPENDIX I: OMITTED DISCLOSURE REQUIREMENTS FROM ENVIRONMENTAL, SOCIAL AND GOVERNANCE STANDARDS

Topic	Omitted DRs	Explanation / Reason for omission
Carbon credits	E1-7	<b>Not applicable:</b> In 2025, MOL Group has not financed any GHG removals and GHG mitigation projects through carbon credits.
Microplastics	E2-4. 28b, AR40	<b>Not material:</b> Topic of microplastic is currently not considered material.
Substances of concern / substances of very high concern	E2-5 34-35.	<b>Limited applicability:</b> 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 were identified where the use of substances of concern / very high concern is material.
Biodiversity transition plan	E4-1.	<b>Not material:</b> No material dependency or opportunity has 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.
Local and indigenous knowledge and nature- based solutions	E4-3 28c.	<b>No information</b> on incorporated local and indigenous knowledge and nature- based solutions into biodiversity and ecosystems-related actions.
Sustainable land or agricultural practices, deforestation	E4-4. 24 b) d)	<b>Not applicable:</b> MOL Group has not adopted policies related to sustainable land or agricultural practices, nor policies addressing deforestation, as it does not operate in sectors where such impacts or risks are relevant. They addressed in the upstream value chain through the MOL Group Supplier Code of Conduct, which requires suppliers to follow general environmental-stewardship expectations, including responsible resource use and compliance with applicable environmental laws across their operations.
Durability, reparability and recyclability of products	E5-4 30-31.; AR 23 E5-5 36.; AR 27	<b>Not applicable:</b> 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. Information on secondary material use in case of fuel products is covered by chapter E5.
Anticipated financial effects	E1-9; E2-6; E3-5; E4-6; E5-6	<b>Under phase-in period</b>
Opportunities related to own workforce / workers in the value chain	S1-4.40.b.	<b>Not material:</b> No material opportunities identified in the topic of own workforce / workers in the value chain.
Workers in the value chain	S2 – All disclosure requirements	<b>Incorporated into S1:</b> Similarly to other topical chapters, value chain related disclosures on workers are not reported in separate chapters from information on own operations: Disclosures on workers in the value chain are incorporated into chapter on workforce (S1).
Negative impacts on workers that arise from transition to greener, climate-neutral economy	S1-4. AR 43	<b>Not material:</b> No material negative impacts identified on workers that arise from transition to greener, climate-neutral economy.
Rights of indigenous peoples	S3-2.17. & 23.	<b>Not material:</b> MOL Group's operations are not in proximity of, or having a material negative impact on 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 affected communities	S3-4 34.b.	<b>Not material:</b> No material opportunities identified in the topic of affected communities.
Severe human rights issues and incidents connected to affected communities	S3-4.36.	<b>Not material:</b> No severe human rights issues and incidents connected to affected communities have been identified.
Severe human rights issues and incidents connected to consumers and end-users	S4-4 35.	<b>Not material:</b> No material negative impacts identified on consumers and end-users related to human right issues and incidents.
Targets related to consumers & end users	S4-4 41.	<b>Not applicable:</b> MOL Group has not published any targets related to the topic on consumers and end-users.
Animal welfare	G1-1 10. (f)	<b>Not material:</b> No material impacts, risks or opportunities identified related to animal welfare.
Functions at risk of corruption and bribery	G1-1 10. (h) G1-3 21. (b)	<b>Not applicable:</b> MOL Group's antifraud and anticorruption practices cover all functions without distinct areas. Therefore, functions at risk is not an applicable category.

## APPENDIX II: MINIMUM DISCLOSURE REQUIREMENTS - POLICIES REFERENCED IN THE SUSTAINABILITY STATEMENT

General information	Key content
<b>Circular Economy Services Area Book</b> <ul style="list-style-type: none"> <li><b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation.</li> <li><b>Accountable for implementation:</b> Head of Circular Economy Services (Process Owner)</li> <li><b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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.</p>
<b>MOL Group Code of Ethics and Business Conduct</b> <ul style="list-style-type: none"> <li><b>Scope:</b> All managers and employees of MOL Plc. and all business enterprises controlled directly or indirectly by MOL Plc.</li> <li><b>Accountable for implementation:</b> Signed by top management, with main responsibility held by MOL Group Ethics Council</li> <li><b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a>.</li> </ul>	<p>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.</p> <p><b>Third party standards or initiatives:</b> 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 of 2013 of Hungary on Complaints and Public Interest Disclosure</p>
<b>MOL Group Business Partner Code of Ethics</b> <ul style="list-style-type: none"> <li><b>Scope:</b> All managers and employees of MOL Plc. and all business enterprises controlled directly or indirectly by MOL Plc.</li> <li><b>Accountable for implementation:</b> Signed by top management, with main responsibility held by MOL Group Ethics Council</li> <li><b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a>.</li> </ul>	<p>MOL Group <i>Business Partner Code of Ethics</i> is the essence of MOL Group <i>Code of Ethics and Business Conduct</i> containing the norms MOL consider particularly important in business relations, and also expects the business partners to comply with these norms, however, it is not interchangeable with the MOL Group <i>Code of Ethics and Business Conduct</i> which business partners are encouraged to familiarize themselves with.</p> <p>Business partners include suppliers, contractors, service providers, customers, transaction partners, advisors, sponsorship or corporate giving co-operation and other contracted partners of MOL Group companies, whom MOL Group expects to follow the highest standards of business ethics.</p>
<b>Code of Responsible Procurement</b> <ul style="list-style-type: none"> <li><b>Scope:</b> All business partners, suppliers and subcontractors providing products or services to MOL Group across the entire inbound supply chain.</li> <li><b>Accountable for implementation:</b> Group Procurement</li> <li><b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a>.</li> </ul>	<p>Defines the principles and expectations for responsible procurement across MOL Group. The Code sets out how sustainability considerations—environmental, social and governance factors—are integrated into procurement decisions and processes. Its purpose is to ensure that MOL Group collaborates only with partners who share the same values related to sustainable, ethical and transparent business conduct.</p>
<b>Community Engagement Methodology Guide</b> <ul style="list-style-type: none"> <li><b>Scope:</b> MOL Group - general</li> <li><b>Accountable for implementation:</b> Vice President Corporate Communications and Marketing</li> <li><b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a>.</li> </ul>	<p>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.</p> <p><b>Third party standards or initiatives:</b> AA1000SES:2015 Stakeholder Engagement Standard</p>
<b>Corporate Affairs Area Book</b>	<p>Defines basic rules and requirements to establish the framework of MOL Group's activities with respect to regulatory and public affairs.</p>

General information	Key content
<ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Strategic Operations and Corporate Development</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	
<b>Cyber Security Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Group</li> <li>• <b>Accountable for implementation:</b> Head of Information Security</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	Defines the processes, basic rules and requirements established within MOL Group's Cyber Security.
<b>Diversity &amp; Inclusion Process Description</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group HR Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	Ensuring that upholding Diversity & Inclusion standards is a common responsibility throughout MOL Group.
<b>Downstream Development Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Downstream Production and Development Senior Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	Setting the direction for the Downstream business by developing business strategy and roadmap and description of how this is done through core processes.
<b>Downstream Production Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Downstream Development Senior Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	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.
<b>Downstream Tactical Planning and Margin Management</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Downstream Value chain management senior vice president</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	Defining how to set short term targets for MOL Group's Downstream business segment.
<b>Energy Management Policy</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc.</li> <li>• <b>Accountable for implementation:</b> Signed by: CEO, Deputy CEO, Managing Director</li> <li>• <b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a> and communicated internally through employee training,</li> </ul>	<p>MOL Plc.'s commitment to continuously improve the efficiency of our energy use, to increase competitiveness and helps to preserve the environment.</p> <p><b>Third party standards or initiatives:</b> Aligns with ISO 50001 (Energy Management Systems)</p>

General information	Key content
operational guidelines, and corporate initiatives.	
<b>Group HSE and Social Impact Policy</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Group and its contracting parties</li> <li>• <b>Accountable for implementation:</b> Signed by top management</li> <li>• <b>Availability:</b> Publicly available on <a href="#">MOL Group website</a> and communicated internally through employee training and operational management. Suppliers are informed via compliance requirements, ensuring broad awareness and implementation across the value chain.</li> </ul>	Declaring MOL Group's public commitment to acting responsibly regarding the health, safety, environmental and social impacts of our daily operations.
<b>Group Level People Strategy</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Group</li> <li>• <b>Accountable for implementation:</b> Group HR Vice President</li> <li>• <b>Availability:</b> Presented to MOL Group top management and Supervisory Board whenever updated (latest update: June 2024)</li> </ul>	Sets the key principles related to Human Resource management within MOL Group.
<b>Health Safety and Environment Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> HSE Senior Vice President (Process Owner)</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG.</li> </ul>	Highest level process-based regulation in the field of HSE management, focusing on end-to-end processes describing the operation model.
<b>Health Safety and Environment Management System</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> HSE Senior Vice President (Process Owner), and local CEOs and local SD&amp;HSE Managers.</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG. Updates to KPIs and HSE indicators are communicated to relevant HSE contacts, ensuring stakeholders stay informed about performance metrics and continuous improvement initiatives.</li> </ul>	<p>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.</p> <p><b>Third party standards or initiatives:</b> ISO 14001 for environmental management, OHSAS 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.</p>
<b>Human Resources Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation.</li> <li>• <b>Accountable for implementation:</b> HR Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	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.
<b>Integrated Management System of MOHU</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOHU Plc.</li> </ul>	States MOHU Plc.'s commitment to enhance waste management in Hungary, promoting a circular economy and sustainability, shifting societal views on waste, reducing pollution, and supporting carbon neutrality.

General information	Key content
<ul style="list-style-type: none"> <li>• <b>Accountable for implementation:</b> CEO of MOHU Zrt.</li> <li>• <b>Availability:</b> Publicly available on <a href="#">MOHU's website</a> (in Hungarian)</li> </ul>	<p><b>Third party standards or initiatives:</b> ISO 9001 - Quality Management Systems; ISO 14001 - Environmental Management Systems; ISCC document on handling used cooking oil</p>
<p><b>Manage Community Engagement and Grievances</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Vice President Corporate Communications and Marketing</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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.</p> <p><b>Third party standards or initiatives:</b> ISO 9001:2015, ISO 14001:2015, AA1000 Stakeholder Engagement Standard 2015, IPIECA: Community grievance mechanisms in the oil and gas industry</p>
<p><b>Managing Corporate Giving Activities Process Description</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Vice President Corporate Communications and Marketing</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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.</p>
<p><b>Mobility Area Book</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Head of Group Mobility</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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.</p>
<p><b>MOL Group Operational and Organisational Rules</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> 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 controlling rights based on a contract concluded with the other owner(s).</li> <li>• <b>Accountable for implementation:</b> Group Strategic Operations and Corporate Development Executive Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>Defines general Operational &amp; Organisational Rules to attain MOL Group strategic objectives and increase shareholder value.</p>
<p><b>Non-HC Procurement Area Book</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved in matrix operation.</li> <li>• <b>Accountable for implementation:</b> Group Procurement</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>The regulation establishes the core procurement methodology and ensures transparent, standardized and compliant operations throughout the entire procurement lifecycle—from Plan-to-Strategy, through Source-to-Contract, to Demand-to-Delivery. It sets out the overarching governance framework, category management expectations and supplier lifecycle management approach.</p>
<p><b>Optimisation, Sales and New Businesses Area Book</b></p>	<p>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.</p>

General information	Key content
<ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Downstream Executive Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	
<b>Process Safety Management Process Description</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group HSE Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>Defines the process safety management requirements in MOL Group in order to support the execution on of the business strategic objectives.</p>
<b>Processing Personal Data at MOL Group process description</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation.</li> <li>• <b>Accountable for implementation:</b> Head of Group Legal &amp; Compliance</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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.</p> <p><b>Third party standards or initiatives:</b> 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)</p>
<b>Renewables &amp; Energy Efficiency Management Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled European operative subsidiaries involved into matrix operation.</li> <li>• <b>Accountable for implementation:</b> Head of Group Renewables</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>Defining basic rules and requirements to establish MOL Group's Renewables &amp; Energy Efficiency Management Framework.</p> <p><b>Third party standards or initiatives:</b> Energy Management System (ISO 50001)</p>
<b>Retail Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Retail Senior Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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</p>
<b>Security Area Book</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation</li> <li>• <b>Accountable for implementation:</b> Group Security Director</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>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, security operations, technical security services, crisis &amp; continuity management, travel security and anti-fraud &amp; investigation related activities.</p> <p><b>Third party standards or initiatives:</b> SOLAC: Safety of Life At Sea Convention; ISPC: International Ship and Port facility Security</p>
<b>Shape Tomorrow Strategy</b> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Group – in general</li> <li>• <b>Accountable for implementation:</b> MOL Group's management as a whole</li> <li>• <b>Availability:</b> Publicly available on <a href="#">MOL Group's website</a>.</li> </ul>	<p>Shape Tomorrow is MOL Group long-term integrated business and sustainability strategy.</p>

General information	Key content
<p><b>Talent Management Process Description</b></p> <ul style="list-style-type: none"> <li>• <b>Scope:</b> MOL Plc. and controlled, operative subsidiaries involved into matrix operation.</li> <li>• <b>Accountable for implementation:</b> Group HR Vice President</li> <li>• <b>Availability:</b> Available internally to all employees via e-REG</li> </ul>	<p>Ensures harmonised and unified integrated Talent Management process across MOL Group, have unified Talent Management language, reach clarity over Talent roles, responsibilities and KPIs.</p>



## **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.

The assurance statement regarding the sustainability disclosures are provided as separate documents on MOL Group's website.

# **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 2025**

**Budapest, 18 March 2026**

# CONSOLIDATED FINANCIAL STATEMENTS

## Introduction

### General information

MOL Hungarian Oil and Gas Public Limited Company (hereinafter referred to as MOL Nyrt., 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 Nyrt. 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 2,300 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 2026.

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.....	196
Consolidated Statement of profit or loss .....	197
Consolidated statement of other comprehensive income .....	198
Consolidated statement of financial position.....	199
Consolidated statement of changes in equity .....	200
Consolidated statement of cash flows .....	201
Notes	
1. Material accounting policies and other explanatory information .....	202
2. Segmental information .....	207
3. Total operating income .....	211
4. Total operating expenses .....	213
5. Finance result .....	216
6. Investments in associates and joint ventures .....	216
7. Income taxes .....	220
8. Components of other comprehensive income .....	223
9. Property, plant and equipment, investment property and intangible assets .....	225
10. Business combinations and transactions with non-controlling interests .....	237
11. Inventories .....	240
12. Material non-controlling interest .....	241
13. Disposals .....	242
14. Other non-current assets .....	242
15. Other current assets .....	242
16. Provisions .....	242
17. Other non-current liabilities .....	246
18. Other current liabilities .....	246
19. Asset held for sale and discontinued operation .....	247
20. Financial risk and capital management .....	251
21. Financial instruments .....	259
22. Fair value measurement of financial instruments .....	262
23. Trade and other receivables .....	263
24. Cash and cash equivalents .....	264
25. Commitments and contingent liabilities .....	265
26. Notes to the consolidated statements of cash flows .....	268
27. Earnings per share .....	269
28. Related party transactions .....	270
29. Events after the reporting period .....	271
30. Appendices .....	272

## 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

		2025	2024
	Notes	HUF million	HUF million
Net sales		8,696,283	9,178,677
Other operating income		77,315	69,837
<b>Total operating income</b>	3	<b>8,773,598</b>	<b>9,248,514</b>
Raw materials and consumables used		6,673,581	7,360,586
Employee benefits expense		499,012	444,386
Depreciation, depletion, amortisation and impairment		641,294	506,442
Other operating expenses		599,409	627,988
Change in inventory of finished goods and work in progress		67,816	(118,501)
Work performed by the enterprise and capitalised		(144,002)	(157,259)
<b>Total operating expenses</b>	4	<b>8,337,110</b>	<b>8,663,642</b>
<b>Profit from operation</b>		<b>436,488</b>	<b>584,872</b>
Finance income		127,245	88,800
Finance expense		104,849	155,716
<b>Total finance expense, net</b>	5	<b>22,396</b>	<b>(66,916)</b>
Share of after-tax results of associates and joint ventures	6	23,937	24,347
<b>Profit/(Loss) before tax</b>		<b>482,821</b>	<b>542,303</b>
Income tax expense	7	142,880	145,600
<b>Profit/(Loss) for the year from continuing operations</b>		<b>339,941</b>	<b>396,703</b>
<b>Profit / (Loss) for the period from discontinued operations</b>	19	<b>-</b>	<b>(40,893)</b>
<b>PROFIT / (LOSS) FOR THE PERIOD</b>		<b>339,941</b>	<b>355,810</b>
<b>Attributable to:</b>			
Owners of parent from continuing operations		298,053	368,158
Non-controlling interest from continuing operations		41,888	28,545
Owners of parent from discontinued operations		-	(40,893)
Non-controlling interest from discontinued operations		-	-
Owners of parent		298,053	327,265
Non-controlling interest		41,888	28,545
Basic earnings per share attributable to owners of the parent (HUF) cont.op.	27	398.08	496.19
Diluted earnings per share attributable to owners of the parent (HUF) cont.op.		398.08	496.19
Basic earnings per share attributable to owners of the parent (HUF) discount.op.		-	(55.11)
Diluted earnings per share attributable to owners of the parent (HUF) discount.op.		-	(55.11)
Basic earnings per share attributable to owners of the parent (HUF)		398.08	441.08
Diluted earnings per share attributable to owners of the parent (HUF)	27	398.08	441.08

## CONSOLIDATED STATEMENT OF OTHER COMPREHENSIVE INCOME

		2025	2024
	Notes	HUF million	HUF million
<b>Profit/(Loss) for the year from continuing operations</b>		<b>339,941</b>	<b>396,703</b>
<b>Profit/(Loss) for the year from discontinued operations</b>		<b>-</b>	<b>(40,893)</b>
<b>Profit/(Loss) for the year</b>		<b>339,941</b>	<b>355,810</b>
Other comprehensive income			
<i>Other comprehensive income to be reclassified to profit or loss in subsequent periods:</i>			
Exchange differences on translating foreign operations, net of tax	8	(272,056)	250,958
Exchange differences on translating discontinued operations, net of tax		-	-
Net investment hedge, net of tax	8	13,324	(19,557)
Changes in fair value of debt instruments at fair value through other comprehensive income, net of tax	8	(556)	(530)
Changes in fair value of cash flow hedges, net of tax	8	417	(681)
Share of other comprehensive income of associates and joint ventures	8	(15,214)	13,200
<b>Other comprehensive income from continuing operation / (loss) for the year, net of tax</b>		<b>(274,085)</b>	<b>243,390</b>
<b>Net other comprehensive income to be reclassified to profit or loss in subsequent periods</b>		<b>(274,085)</b>	<b>243,390</b>
<i>Other comprehensive income not to be reclassified to profit or loss in subsequent periods:</i>			
Changes in fair value of equity instruments at fair value through other comprehensive income, net of tax	8	35,410	12,028
Remeasurement of post-employment benefit obligations	8	(1,527)	97
<b>Net other comprehensive income not to be reclassified to profit or loss in subsequent periods</b>		<b>33,883</b>	<b>12,125</b>
<b>Other comprehensive income from continuing operation / (loss) for the year, net of tax</b>		<b>(240,202)</b>	<b>255,515</b>
<b>Other comprehensive income for the period, net of tax</b>		<b>(240,202)</b>	<b>255,515</b>
<b>Total comprehensive income from continuing operation for the period</b>		<b>99,739</b>	<b>652,218</b>
<b>Total comprehensive income from discontinued operation for the period</b>		<b>-</b>	<b>(40,893)</b>
<b>Total comprehensive income for the period</b>		<b>99,739</b>	<b>611,325</b>
<b>Attributable to:</b>			
Owners of parent from continuing operation		80,023	596,131
Non-controlling interest from continuing operation		19,716	56,087
Owners of parent from discontinued operation		-	(40,893)
Non-controlling interest from discontinued operation		-	-
Owners of parent		80,023	555,238
Non-controlling interest		19,716	56,087

## CONSOLIDATED STATEMENT OF FINANCIAL POSITION

		31 Dec 2025	31 Dec 2024
	Notes	HUF million	HUF million
<b>NON-CURRENT ASSETS</b>			
Property, plant and equipment	9	4,361,592	4,632,771
Investment property	9	17,872	18,612
Intangible assets	9	486,175	517,440
Investments in associates and joint ventures	6	215,559	244,754
Other non-current financial assets	21	311,575	289,653
Deferred tax assets	7	154,949	135,262
Other non-current assets	14	76,576	74,943
<b>Total non-current assets</b>		<b>5,624,298</b>	<b>5,913,435</b>
<b>CURRENT ASSETS</b>			
Inventories	11	780,213	880,527
Trade and other receivables	23	894,131	953,910
Securities	21	168,758	6,711
Other current financial assets	21	37,264	71,263
Income tax receivable		9,926	72,157
Cash and cash equivalents	24	360,767	433,610
Other current assets	15	156,242	140,864
Assets classified as held for sale	19	161,839	1,524
<b>Total current assets</b>		<b>2,569,140</b>	<b>2,560,566</b>
<b>Total assets</b>		<b>8,193,438</b>	<b>8,474,001</b>
<b>EQUITY</b>	20		
Share capital		79,650	79,443
Retained earnings and other reserves		3,772,480	3,836,873
(Loss) / Profit for the year attr. to owners of parent		298,053	327,265
<b>Equity attributable to owners of parent</b>		<b>4,150,183</b>	<b>4,243,581</b>
<b>Non-controlling interest</b>		<b>412,210</b>	<b>415,527</b>
<b>Total equity</b>		<b>4,562,393</b>	<b>4,659,108</b>
<b>NON-CURRENT LIABILITIES</b>			
Long-term debt	21	654,194	962,758
Other non-current financial liabilities	21	26,078	7,175
Non-current provisions	16	693,046	707,255
Deferred tax liabilities	7	161,701	177,556
Other non-current liabilities	17	45,881	46,571
<b>Total non-current liabilities</b>		<b>1,580,900</b>	<b>1,901,315</b>
<b>CURRENT LIABILITIES</b>			
Short-term debt	21	381,397	290,246
Trade and other payables	21	805,499	901,377
Other current financial liabilities	21	259,141	239,574
Current provisions	16	141,352	117,599
Income tax payable		21,605	35,210
Liabilities classified as held for sale	19	116,516	-
Other current liabilities	18	324,635	329,572
<b>Total current liabilities</b>		<b>2,050,145</b>	<b>1,913,578</b>
<b>Total liabilities</b>		<b>3,631,045</b>	<b>3,814,893</b>
<b>Total equity and liabilities</b>		<b>8,193,438</b>	<b>8,474,001</b>



## CONSOLIDATED STATEMENT OF CHANGES IN EQUITY

		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
	Notes	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Opening balance 1 Jan 2024</b>		<b>79,192</b>	<b>219,389</b>	<b>35,647</b>	<b>539,120</b>	<b>2,963,638</b>	<b>3,757,794</b>	<b>3,836,986</b>	<b>360,326</b>	<b>4,197,312</b>
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		-	-	-	-	-	-	-	-	-
<b>Closing balance 31 Dec 2024</b>		<b>79,443</b>	<b>219,389</b>	<b>45,385</b>	<b>757,399</b>	<b>3,141,965</b>	<b>4,164,138</b>	<b>4,243,581</b>	<b>415,527</b>	<b>4,659,108</b>
<b>Opening balance 1 Jan 2025</b>		<b>79,443</b>	<b>219,389</b>	<b>45,385</b>	<b>757,399</b>	<b>3,141,965</b>	<b>4,164,138</b>	<b>4,243,581</b>	<b>415,527</b>	<b>4,659,108</b>
Profit / (loss) for the year from continuing operation		-	-	-	-	298,053	298,053	298,053	41,888	339,941
Profit / (loss) for the year from discontinued operation		-	-	-	-	-	-	-	-	-
Other comprehensive income / (loss) for the year from continuing operation		-	-	36,890	(253,500)	(1,420)	(218,030)	(218,030)	(22,172)	(240,202)
Other comprehensive income / (loss) for the year from discontinued operation		-	-	-	-	-	-	-	-	-
Total comprehensive income / (loss) for the year		-	-	36,890	(253,500)	296,633	80,023	80,023	19,716	99,739
Dividends	20	-	-	-	-	(175,229)	(175,229)	(175,229)	-	(175,229)
Dividends to non-controlling interests	20	-	-	-	-	-	-	-	(24,876)	(24,876)
Equity recorded for share-based payments	4	207	-	-	-	2,724	2,724	2,931	-	2,931
Treasury share transactions	20	-	-	-	-	-	-	-	-	-
Acquisition / divestment of subsidiaries		-	-	-	-	-	-	-	1,091	1,091
Acquisition of non-controlling interests		-	-	-	-	(1,123)	(1,123)	(1,123)	752	(371)
Other		-	-	-	-	-	-	-	-	-
<b>Closing balance 31 Dec 2025</b>		<b>79,650</b>	<b>219,389</b>	<b>82,275</b>	<b>503,899</b>	<b>3,264,970</b>	<b>4,070,533</b>	<b>4,150,183</b>	<b>412,210</b>	<b>4,562,393</b>

## CONSOLIDATED STATEMENT OF CASH FLOWS

		2025	2024
	Notes	HUF million	HUF million
<b>Profit/(Loss) before tax from continuing operation</b>		<b>482,821</b>	<b>542,303</b>
<b>Profit/(Loss) before tax from discontinued operation</b>		<b>-</b>	<b>(40,893)</b>
<b>Profit/(Loss) before tax</b>		<b>482,821</b>	<b>501,410</b>
<i>Adjustments to reconcile profit before tax to net cash provided by operating activities</i>			
Depreciation, depletion, amortisation and impairment	4	641,294	506,442
Increase/(decrease) in provisions	16	14,316	(1,846)
Net (gain)/loss on asset disposal and divestments		198	(28,674)
Net interest expense/(income)	5	40,458	34,440
Other finance expense/(income)	5	(62,854)	34,063
Share of after-tax results of associates and joint ventures	6	(23,937)	(24,347)
Other items	26	30,458	88,740
Income taxes paid	7	(200,025)	(195,639)
<b>Cash flows from operations before changes in working capital</b>		<b>922,729</b>	<b>914,589</b>
<i>Change in working capital</i>		<i>54,074</i>	<i>(94,089)</i>
(Increase)/decrease in inventories	11	46,860	(32,170)
(Increase)/decrease in trade and other receivables	23	(26,506)	34,862
Increase/(decrease) in trade and other payables	21	(24,259)	(158,688)
(Increase)/decrease in other assets and liabilities	15, 18	57,979	61,907
<b>Cash flows from operations</b>		<b>976,803</b>	<b>820,500</b>
Capital expenditures	2	(560,059)	(599,017)
Proceeds from disposal of fixed assets		7,072	42,600
Acquisition of businesses (net of cash)	10	(13,485)	(2,184)
Proceeds from disposal of businesses (net of cash)	13, 19	16,972	268
(Increase)/Decrease in other financial assets	21	(142,289)	(4,461)
Interest received and other finance income	5	26,710	27,232
Dividends received	5	16,725	23,136
<b>Cash flows used in investing activities</b>		<b>(648,354)</b>	<b>(512,426)</b>
Proceeds from issue of bonds, notes and debentures		-	-
Repayments of bonds, notes and debentures		-	-
Proceeds from borrowings		1,252,501	2,004,706
Repayments of borrowings		(1,314,375)	(2,061,963)
Interest paid and other finance expense	5	(32,514)	(29,915)
Dividends paid to owners of parent	20	(215,057)	(194,982)
Dividends paid to non-controlling interest	20	(24,634)	(48,173)
Transactions with non-controlling interest		(630)	18
Net issue / repurchase of treasury shares		-	-
Other changes in equity		-	-
<b>Cash flows used in financing activities</b>		<b>(334,709)</b>	<b>(330,309)</b>
Currency translation differences relating to cash and cash equivalents		(57,618)	40,051
<b>Increase/(decrease) in cash and cash equivalents</b>		<b>(63,878)</b>	<b>17,816</b>
Cash and cash equivalents at the beginning of the year		433,610	412,977
Cash and cash equivalents at the end of the year		360,767	433,610
<b>Change in Cash and cash equivalents</b>		<b>(72,843)</b>	<b>20,633</b>
Change in cash and cash equivalents classified as asset held for sale		8,809	-
Change in Overdraft		156	(2,817)
<b>Increase/(decrease) in cash and cash equivalents</b>		<b>(63,878)</b>	<b>17,816</b>

## 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.

### 1. 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 2025.

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 2025 comprise the accounts of the MOL Nyrt. and the subsidiaries that it controls together with the Group's attributable share of the results of associates and joint ventures. MOL Nyrt. 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 2025:

- Amendments to IAS 21 *The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability* (issued on 15 August 2023, effective from 1 January 2025).

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

#### Amendments in accounting policies

Voluntary amendments

No voluntary changes were made in 2025.

#### 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 2024 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 740 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 (REDIII), targets for renewable fuels of non-biological origin (commonly known as green hydrogen), 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 CO2 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 CO2 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 Reserve evaluation production profile and 3 years time series of business plan figures approved by the Board of Directors, further years are estimated assuming a growth rate according to relevant inflation rate. 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 Property, plant and equipment (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 utilisation 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 the Russian invasion of Ukraine on 24 February 2022 may continue to affect MOL Group in the future. Management is continuously reviewing and assessing the impact of the current geopolitical situation, international sanctions and other potential restrictions on the supply chain and business activities. MOL Group has made decisions in its credit policy to minimise exposure. MOL Group has exposure to Russia mainly through receivables related to BaiTex LLC. Payments made by BaiTex LLC. to MOL Group in 2023, 2024 and 2025 are in a restricted bank account due to Russian counter-sanctions, therefore the amount is not available for general use. MOL Group impaired the full value of the investment, receivables and the balance of the restricted bank account in 2023, 2024 and 2025. MOL Group's exposure to Ukraine is not significant apart of the physical crude flow. MOL Group's refining business is exposed to the physical flow of crude oil through the Russian, Belarusian and Ukrainian transportation systems. The physical flow of crude oil from Russia has been temporarily interrupted due to war damage to the Ukrainian energy infrastructure. However, there is an alternative transportation route from the Mediterranean Sea, via Croatia (Adria pipeline and related infrastructure), which can supply MOL Group's refineries in Hungary and Slovakia with seaborne crude oil shipments. However, due to the infrastructural constraints on the Croatian section of the Adria pipeline – based on the tests carried out so far – this pipeline could only supply the two refineries at approx. 80% capacity, thus necessarily reducing their capacity utilisation. The European Union imposed a partial embargo on Russian crude oil imports from 5 December 2022 and on Russian petroleum products from 5 February 2023. At the same time, a ban on the export of petroleum products produced from Russian crude oil also entered into force. However, the regulations allow for the continued import of Russian crude oil via pipeline, including to Hungary and Slovakia, and the continued export of petroleum products produced from Russian crude oil from Hungary and Slovakia for an indefinite period, provided that the percentage of exports does not exceed the percentage of non-Russian crude oil when blended with Russian crude oil as a refinery feedstock. The 16th sanctions package, adopted in February 2025, allows Hungary and Slovakia to freely trade refined products produced from Russian crude oil between each other. Management is taking steps to address the risk of potential oil supply disruptions, including considering alternative transportation routes with sufficient capacity. MOL Group has access to state reserves, which enables it to supply its markets even in the event of a disruption of the Druzhba oil pipeline. On October 22, 2025, the U.S. Treasury Department imposed sanctions on Lukoil and its subsidiaries in which the company holds a 50% or greater stake, pursuant to Executive Order 14024. The latter category included one of MOL's trading partners, Swiss-based Litasco SA, from which MOL sourced approximately 40-50% of its Russian crude oil imports. From December 2025, Lukoil's parent company will fulfil the contractual obligations instead of Litasco. Following the agreement in principle reached at the meeting between the Hungarian and U.S. governments in Washington on November 7, the US sanctions authority granted Hungary a partial (one-year) exemption from US sanctions affecting Lukoil.

#### **b) Fire incident at the Danube Refinery**

On the night of Monday, October 20, 2025, a fire broke out at the AV-3 unit of the Danube Refinery, which was extinguished on next day. No injuries occurred. The air quality was continuously monitored by the authorities, and no measurements above health limits have been detected. The damage assessment has started on 22nd of October, the equipment damaged in the fire cooled down, the fact-finding working group was established. In cooperation with the authorities, a team of experts consisting of structural engineers, mechanical engineers, technicians, electrical and chemical engineers started to examine what can be saved, what should be dismantled, and what needs to be rebuilt in the AV-3 unit. Following the damage assessment, a detailed demolition and restoration plan is prepared. Emergency protocols were followed in the affected units, and the restart of the plant units that were not affected by the fire was proceeding according to schedule, so the fuel production resumed at the Danube Refinery at reduced capacity at the end of October and the fuel production and secondary product output are operating at the maximum possible level. In addition, to ensure regional supply, the MOL Group is making the greatest possible use of synergies between its refineries (Bratislava, Százhalombatta, and Rijeka), and if necessary, Mol Group can also import petroleum products from outside the region. Hungary's supply is secure: the country has sufficient fuel.

#### **c) New onshore exploration agreement in Azerbaijan**

MOL Group and SOCAR (State Oil Company of the Republic of Azerbaijan) have signed a comprehensive exploration, development and production sharing agreement for an onshore area in the Shamakhi-Gobustan region of Azerbaijan. MOL Group as operator has 65% stake and SOCAR has 35% in the joint exploration project. Capitalising on the alignment reached in June 2025 on key terms for the joint hydrocarbon exploration in the Shamakhi-Gobustan region in Azerbaijan, this fully termed agreement marks a significant milestone in MOL's strategic partnership with SOCAR, which is built on previous successful cooperation. The agreement reaffirms MOL Group's long-term strategic presence in the Caspian region and partnership with SOCAR in the development of Azerbaijan's hydrocarbon resources. As part of the next steps in the exploration project, a seismic survey is scheduled to begin in early 2026, followed by the exploration drilling at a later stage.

#### **d) Windfall taxes**

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

##### **► Mining royalty**

In September 2023, MOL has made commitments by signing a contract with the authority, exceeding the production volume of the previous year, this resulted in a significant reduction in mining royalty. 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. Effective from January 2025 new royalty regime is introduced. Production commitments eliminated, including authority contracts. The new regime also introduced new categories and progressive royalty rates which decreases rates at low price environment, but equally enables the state to predictably realise higher royalty in case of higher prices. Also, regulated gas price scheme is abolished.

##### **► 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/bbl. Effective from 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 Nyrt.

##### **► Carbon dioxide quota tax**

A carbon dioxide quota tax has been introduced for operators of an installation receiving a significant free allocation of CO<sub>2</sub> emission rights for the tax year starting after 31 December 2022. The tax is based on the amount of carbon dioxide emissions in tons. The tax rate is 36 EUR/tCO<sub>2</sub>, equivalent in Hungarian forints.

##### **► Revenue-based tax**

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 was 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 increased: in the range of HUF 500 million – HUF 30,000 million the rate increased from 0.1% to 0.15%, in the range of HUF 30,000 million – HUF 100,000 million the rate increased from 0.4% to 1%, above HUF 100,000 million the rate increased from 2.7% to 4.1%. From 2024, the tax rate for the highest revenue increased to 4.5%, however for fuel products 3% tax rate applies (for all revenue ranges above 500 million HUF) for 2024 and for 2025. From 2025, the revenue ranges have been raised while tax rates remain unchanged: in the range of HUF 1,000 million – HUF 50,000 million the rate is 0.15%, in the range of HUF 50,000 million – HUF 150,000 million the rate is 1%, above HUF 150,000 million the rate is 4.5%.

► Slovakian 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 1 January 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 a coefficient. The coefficient is calculated as a share of revenues from regulated activities to the total revenues. Special levy is deductible from the CIT base.

In the statement of profit or loss mining royalty, extra profit tax, carbon dioxide quota tax and retail tax are recorded as other operating expense, special levy is recognised as income tax expense. 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 2025 and 31 December 2024. 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.

### 2. Segmental information

#### Accounting policies

For management purposes the Group is organised into six major operating business units: Upstream, Downstream, Consumer Services, Gas Midstream, Circular Economy, 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.

2025	Upstream	Downstream	Consumer Services	Gas Midstream	Circular Economy	Corporate and other	Inter-segment transfers	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Net Revenue</b>								
External sales	80,253	4,547,275	3,415,096	108,023	440,037	105,599	-	8,696,283
Inter-segment transfers	578,199	2,437,216	30,651	7,729	8,464	334,432	(3,396,691)	-
<b>Total revenue</b>	<b>658,452</b>	<b>6,984,491</b>	<b>3,445,747</b>	<b>115,752</b>	<b>448,501</b>	<b>440,031</b>	<b>(3,396,691)</b>	<b>8,696,283</b>
<b>Profit/(loss) from operation</b>	<b>182,483</b>	<b>178,093</b>	<b>201,035</b>	<b>56,789</b>	<b>(28,950)</b>	<b>(170,911)</b>	<b>17,950</b>	<b>436,488</b>
<b>Depreciation, depletion, amortisation and impairment</b>	<b>215,727</b>	<b>217,031</b>	<b>123,149</b>	<b>17,044</b>	<b>17,637</b>	<b>51,867</b>	<b>(1,161)</b>	<b>641,294</b>
From this: impairment losses recognised in statement of profit or loss (incl. dry-holes)	61,541	5,394	35,674	116	981	1,271	-	104,976
From this: reversal of impairment recognised in statement of profit or loss	(7,520)	(234)	(17)	-	-	-	-	(7,771)
<b>EBITDA</b>	<b>398,210</b>	<b>395,124</b>	<b>324,184</b>	<b>73,833</b>	<b>(11,313)</b>	<b>(119,044)</b>	<b>16,789</b>	<b>1,077,782</b>

2024	Upstream	Downstream	Consumer Services	Gas Midstream	Circular Economy	Corporate and other	Inter-segment transfers	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Net Revenue</b>								
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)	-
<b>Total revenue</b>	<b>685,390</b>	<b>7,155,103</b>	<b>3,741,212</b>	<b>127,252</b>	<b>428,595</b>	<b>436,375</b>	<b>(3,395,250)</b>	<b>9,178,677</b>
<b>Profit/(loss) from operation</b>	<b>231,846</b>	<b>247,047</b>	<b>193,788</b>	<b>72,366</b>	<b>(33,405)</b>	<b>(118,253)</b>	<b>(8,517)</b>	<b>584,872</b>
<b>Depreciation, depletion, amortisation and impairment</b>	<b>170,277</b>	<b>180,305</b>	<b>77,260</b>	<b>16,627</b>	<b>13,124</b>	<b>50,241</b>	<b>(1,392)</b>	<b>506,442</b>
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)
<b>EBITDA</b>	<b>402,123</b>	<b>427,352</b>	<b>271,048</b>	<b>88,993</b>	<b>(20,281)</b>	<b>(68,012)</b>	<b>(9,909)</b>	<b>1,091,314</b>

2025	Upstream	Downstream	Consumer Services	Gas Midstream	Circular Economy	Corporate and other	Inter-segment transfers	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Other segment information</b>								
Capital expenditure:	<b>138,929</b>	<b>430,266</b>	<b>36,799</b>	<b>18,982</b>	<b>40,880</b>	<b>94,901</b>	<b>(3,553)</b>	<b>757,204</b>
Property, plant and equipment	118,515	268,045	35,742	16,459	37,031	73,582	(3,553)	545,821
Intangible assets*	20,414	162,221	1,057	2,523	3,849	21,319	-	211,383
Provisions made and used during the year and revision of previous estimates	1,487	10,772	(1,114)	(635)	3,863	277	(334)	14,316
<b>NON-CURRENT ASSETS</b>								
Property, plant and equipment	804,971	2,020,874	746,253	246,623	156,387	415,979	(29,495)	4,361,592
Intangible assets	181,767	108,292	110,412	7,269	7,187	72,646	(1,398)	486,175
Investments in associates and joint ventures	185,600	11,343	-	-	-	18,616	-	215,559

\*From which the increase of the emission quotas, presented as intangible assets, is HUF 162,863 million in the financial year

2024	Upstream	Downstream	Consumer Services	Gas Midstream	Circular Economy	Corporate and other	Inter-segment transfers	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Other segment information</b>								
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
<b>NON-CURRENT ASSETS</b>								
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 emission quotas, 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.

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

	Intangible assets	Property, plant and equipment	Investments in associates and joint ventures	Other non-current assets
	(Note 9)	(Note 9)	(Note 6)	(Note 14)
2025	HUF million	HUF million	HUF million	HUF million
Hungary	183,342	2,076,918	32,301	18,495
Croatia	90,641	790,013	1,582	7,378
Slovakia	14,986	583,871	6,095	113
Azerbaijan	121,314	367,528	-	-
Rest of European Union	70,158	439,362	-	47,377
Rest of Europe	757	62,327	-	2,354
Rest of the World	4,977	41,573	175,581	859
<b>Total</b>	<b>486,175</b>	<b>4,361,592</b>	<b>215,559</b>	<b>76,576</b>

	Intangible assets	Property, plant and equipment	Investments in associates and joint ventures	Other non-current assets
	(Note 9)	(Note 9)	(Note 6)	(Note 14)
2024	HUF million	HUF million	HUF million	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
<b>Total</b>	<b>517,440</b>	<b>4,632,771</b>	<b>244,754</b>	<b>74,943</b>

### 3. 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

	2025	2024
	HUF million	HUF million
Sales of crude oil and oil products	5,904,158	6,389,174
Sales of petrochemical products	828,475	896,387
Sales of services	701,962	653,289
Sales of retail shop products	428,211	418,338
Sales of natural gas and gas products	417,547	487,670
Sales of other products	415,930	333,819
<b>Total</b>	<b>8,696,283</b>	<b>9,178,677</b>

Decrease in the Group's sales revenue is mainly attributed to the decrease in sales of crude oil and oil products which is mainly due to negative macro environment effects in 2025. Lower quoted prices and weakening USD rates furthered by lower sales volumes – especially in Q4 after AV3 fire incident – in MOL and decreased diesel mark-ups.

**b) Sales by geographical area**

	2025	2024
	HUF million	HUF million
Hungary	2,558,734	2,599,373
Croatia	1,065,436	1,106,831
Slovakia	988,959	1,019,541
Poland	582,863	811,115
Czech Republic	542,600	555,155
Romania	540,961	603,553
Italy	491,781	537,514
Slovenia	389,295	383,939
Serbia	297,950	277,533
Austria	250,514	260,737
Bosnia-Herzegovina	220,539	214,749
Switzerland	160,656	143,739
Germany	153,609	152,958
United Kingdom	84,968	63,420
Malta	50,178	34,949
The Netherlands	45,371	43,075
Luxembourg	7,539	106,810
Rest of Central-Eastern Europe	56,647	55,066
Rest of Europe	108,151	107,064
Rest of the World	99,532	101,556
<b>Total</b>	<b>8,696,283</b>	<b>9,178,677</b>

The Group has no single major customer the revenue from which would exceed 10% of the total net sales revenues in 2025 (neither in 2024).

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 2,225,541 million in 2025 and HUF 1,933,997 million in 2024.

**c) Other operating income**

	2025	2024
	HUF million	HUF million
Penalties, late payment interest, compensation received	19,809	9,309
Gain on sales of intangibles, property, plant and equipment	4,767	28,699
Net gain of non-hedge commodity price transactions*	6,124	-
Allowances and subsidies received	8,835	13,896
Gain from the sale of companies	-	227
Accrued deposit return fee	14,704	-
Waste management cost reimbursement	2,697	-
Other	20,379	17,706
<b>Total</b>	<b>77,315</b>	<b>69,837</b>

\* The net result of the non-hedge commodity price transactions was loss in previous 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 decreased by HUF 23,932 million compared to 2024. The gain of previous year mainly involves asset sale to Orlen (transaction was closed in 2024 Q2). Compensations received increased in current year due to a payment of HUF 10,819 million from insurance company as a compensation for the loss occurred at the LDPE plant of Slovnaft in December 2023 and to compensate for lost profits during the period affected by the downtime due to the damage event. The amount of accrued deposit return fee contains the income of unredeemed bottles.

#### 4. 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.

	2025	2024
	HUF million	HUF million
<b>Raw materials and consumables used</b>	<b>6,673,581</b>	<b>7,360,586</b>
Crude oil purchased	2,232,100	2,394,109
Cost of goods purchased for resale	2,252,009	2,899,615
Non-hydrocarbon-based material	642,616	597,961
Value of material-type services used	781,808	730,535
Other raw materials	351,674	323,737
Utility expenses	156,486	166,177
Purchased bio diesel component	143,909	137,228
Value of inter-mediated services	112,979	111,224
<b>Employee benefits expense</b>	<b>499,012</b>	<b>444,386</b>
Wages and salaries	366,500	322,802
Social security	65,658	58,989
Other employee benefits expense	66,854	62,595
<b>Depreciation, depletion, amortisation and impairment</b>	<b>641,294</b>	<b>506,442</b>
<b>Other operating expenses</b>	<b>599,409</b>	<b>627,988</b>
Taxes and contributions	97,227	133,075
Mining royalties	73,474	87,944
Other	104,174	81,915
Other services	90,665	116,056
Bank charges	14,063	12,255
Rental cost	30,597	21,105
Consultancy fees	27,073	23,270
Advertising expenses	20,282	20,050
Insurance fees	17,638	16,580
Provision for greenhouse gas emission over quota allocated free of charge	91,223	73,477
Cleaning costs	15,442	14,427
Site security costs	10,778	8,962
Contribution in strategic inventory storage	6,773	6,537
Net loss of non-hedge commodity price transactions*	-	12,335
<b>Change in inventory of finished goods and work in progress</b>	<b>67,816</b>	<b>(118,501)</b>
<b>Work performed by the enterprise and capitalised</b>	<b>(144,002)</b>	<b>(157,259)</b>
<b>Total operating expenses</b>	<b>8,337,110</b>	<b>8,663,642</b>

\* The net result of the non-hedge commodity price transactions was gain in current 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 decreased due to result of fair valuation of commodity derivatives and less extra profit taxes, offset by increase in other which is related to the acquisition of BME Fenntartó Zrt.

MOL signed a sale and purchase agreement on 23 June 2025 with the Hungarian State to acquire 100% of the ordinary shares of BME Fenntartó Zrt. (“BME Zrt.”) for HUF 50 billion (USD 140 million), payable in annual instalments over the next 10 years. MOL recognised a financial liability at the present value of the purchase price payable in the amount of HUF 36 billion.

The transaction aims to provide a long-term sustainable and competitive organisational and financing structure for Hungarian engineering and IT education and research and development, and to strengthen MOL's role in the development of the Hungarian innovation ecosystem.

As part of the new operating model, the parties created a predictable and sustainable financial framework, which was established in a 25-year framework agreement and a 6-year financing agreement between BME Zrt. and the Hungarian State. This will be further strengthened by revenues from industrial cooperation, grant funding and student tuition fees.



## 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.

	2025	2024
	HUF million	HUF million
Restricted Share Plan	281	124
Short-term Share Ownership Plan	1,485	1,107
Share-based retirement benefit	457	28
<b>Total cash-settled share-based payment expense</b>	<b>2,223</b>	<b>1,259</b>
Restricted Share Plan	2,337	2,714
Short-term Share Ownership Plan	54	(71)
Share Incentive scheme for the members of the Board of Directors	589	617
<b>Total equity-settled share-based payment expense</b>	<b>2,980</b>	<b>3,260</b>
<b>Total expense of share-based payment transactions</b>	<b>5,203</b>	<b>4,519</b>

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.

### 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 2,761 per share in 2025 (HUF 2,817 per share in 2024), 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 company, division, ESG and individual 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

Share entitlement:

- in case of the members of the Board of Directors: **1,600 pieces** of series „A” MOL ordinary shares with a nominal value of HUF 125 per month
- in case of the chairman of the Board of Directors: additional **400 pieces** of series „A” MOL ordinary shares with a nominal value of HUF 125 per month

If the Chairman is not a non-executive director, the deputy chairman (who is non-executive) is entitled to this extra remuneration (400 pieces/month).

The share allowance is provided once a year, within 30 days after the Annual General Meeting closing the given business year.

BoD members are requested to retain their shares credited on their securities account according to the following rules:

- 1/3 of the shares – no retention obligation
- 2/3 of the shares – 1 year retention obligation

The retention obligation terminates at the date of the expiration of the mandate.

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.

	2025	2024
Number of shares vested	196,800	203,200
Share price at the date of grant (HUF/share)	2,761	2,817

### 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 Nyrt. 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 Nyrt. share price is HUF 2,888 in 2025 (2,684 in 2024).

## 5. 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.

	2025	2024
	HUF million	HUF million
<b>Finance result</b>		
Interest income	25,729	23,968
Dividend income	2,942	3,562
Foreign exchange gains	89,957	53,221
Other finance income	8,617	8,049
<b>Total finance income</b>	<b>127,245</b>	<b>88,800</b>
Interest expense	25,647	21,636
Unwinding of discount on provisions	40,539	36,558
Foreign exchange losses	29,000	93,978
Other finance expense	9,663	3,544
<b>Total finance expense</b>	<b>104,849</b>	<b>155,716</b>
<b>Net finance expense (+) / income (-)</b>	<b>(22,396)</b>	<b>66,916</b>

Interest expense on lease liabilities accounted for in the period is HUF 17,567 million (2024: HUF 14,022 million). Finance income on the net investment in the lease accounted for in the period is HUF 249 million (2024: HUF 392 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.

## 6. 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	
			2025	2025	2024	2025	2024
			%	HUF million	HUF million	HUF million	HUF million
<b>Investment in joint ventures</b>							
BaiTex LLC. / MK Oil and Gas B.V.	Russia / Netherlands	Exploration and production activity / Exploration investment management	51%	(7,090)	3,682	-	-
ENEOS MOL Synthetic Rubber Zrt.	Hungary	Production of synthetic rubber	0%	15,526	(4,522)	-	-
Rossi Biofuel Zrt.	Hungary	Biofuel component production	25%	(235)	1,510	7,341	8,054
Dunai Vízmű Zrt.	Hungary	Water production, supply	33%	30	2	159	129
Datapac Group	Slovakia	IT services	25%	11	30	730	762
ALTEO Nyrt.	Hungary	Energy supplier	25%	710	2,528	16,365	15,620
Mogyoród Koncessziós Kft.	Hungary	Exploration and production activity	49%	286	1,476	4,018	4,003
Nagykátá Koncessziós Kft.	Hungary	Exploration and production activity	49%	5	(1,510)	365	465
Ócsa Koncessziós Kft.	Hungary	Exploration and production activity	49%	5	(26)	399	418
MOL-TPOC Buzsák Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	60%	(352)	-	792	-
MOL-TPOC Tamási Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	60%	(6)	-	2,864	-
Other			0%	124	149	-	1
<b>Investment in associated companies</b>							
Pearl Petroleum Ltd.	Kurdistan region/Iraq	Exploration of gas	10%	13,342	15,065	161,516	191,111
BTC	Cayman Islands	Oil transportation	9%	1,394	2,194	-	-
Ural Group Limited	Kazakhstan	Exploration and production activity	28%	364	3,365	14,065	16,546
Meroco a.s.	Slovakia	Production of bio-dieselcomponent (FAME)	25%	(310)	286	3,044	3,500
DAC ARENA a.s.	Slovakia	Facility management	28%	(8)	18	1,519	1,621
Messer Slovnaft s.r.o	Slovakia	Production of technical gases	49%	97	59	800	887
Plinara d.o.o. Pula	Croatia	Distribution and gas trading	49%	(74)	29	1,000	1,140
Plinara Istočne Slavonije d.o.o. za opskrbu plinom	Croatia	Distribution network of gas fuels	40%	118	12	582	497
<b>Total</b>				<b>23,937</b>	<b>24,347</b>	<b>215,559</b>	<b>244,754</b>

## 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 Yerilkinsky 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 Zrt.

MOL Group has minority ownership in Rossi Biofuel Zrt. 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.

### Alteo Nyrt.

MOL Group acquired 24,607% ownership in Alteo Nyrt. in 2023 (4.079% for 3,040 huf/share, 20.525% for 2,872 huf/share). The acquisition is in line with MOL Nyrt.'s 2030 strategy, which aims to increase its presence in the green market. Alteo has a wide portfolio, which includes 317 MW of electricity generating capacity and 922 MW of heating generating capacity using renewable (mainly wind and solar energy) sources. 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 Zrt.

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. The company manufactures synthetic rubber in Tiszaújváros. At the end of September 2024, investment was reclassified as held for sale at HUF nil. The investment was sold with a sale price of EUR 39 million which was accounted for at the closing of the transaction on 30 January 2025.

	BaiTex LLC. / MK Oil and Gas B.V.		Rossi Biofuel Zrt.	
	2025	2024	2025	2024
	HUF million	HUF million	HUF million	HUF million
<b>The joint venture's statement of financial position:</b>				
Non-current assets	35,152	35,043	45,776	46,702
Current assets	23,656	19,256	24,036	21,828
Non-current liabilities	4,847	4,352	15,729	20,951
Current liabilities	6,262	8,333	24,721	15,364
<b>Net assets</b>	<b>47,699</b>	<b>41,614</b>	<b>29,362</b>	<b>32,215</b>
Proportion of the Group's ownership at year end	51%	51%	25%	25%
<b>Group's share of assets</b>	<b>24,326</b>	<b>21,223</b>	<b>7,341</b>	<b>8,054</b>
Fair value adjustment	-	243	-	-
Impairment	(24,326)	(21,466)	-	-
<b>Carrying amount of the investment</b>	<b>-</b>	<b>-</b>	<b>7,341</b>	<b>8,054</b>
<b>The joint venture's statement of profit or loss:</b>				
Net revenue	44,893	60,936	102,905	89,551
Profit/(loss) from operations	926	14,484	(2,015)	3,110
Net income attributable to equity holders	1,481	11,995	(942)	6,038
<b>Group's share of reported profit/(loss) for the year</b>	<b>755</b>	<b>6,117</b>	<b>(235)</b>	<b>1,510</b>
Fair value adjustment P&L impact	(280)	(712)	-	-
Inventory consolidation P&L impact	60	141	-	-
Impairment	(7,625)	(1,864)	-	-
<b>Group's share of profit/(loss) for the year after consolidation</b>	<b>(7,090)</b>	<b>3,682</b>	<b>(235)</b>	<b>1,510</b>

	ALTEO Nyrt.		ENEOS MOL Synthetic Rubber (EMSR) Zrt.*	
	2025	2024	2025	2024
	HUF million	HUF million	HUF million	HUF million
<b>The joint venture's statement of financial position:</b>				
Non-current assets	97,315	49,655	-	112,227
Current assets	32,197	37,101	-	26,868
Non-current liabilities	55,984	28,060	-	135,224
Current liabilities	33,914	22,112	-	9,638
<b>Net assets</b>	<b>39,614</b>	<b>36,584</b>	<b>-</b>	<b>(5,767)</b>
Proportion of the Group's ownership at year end	25%	25%	-	49%
<b>Group's share of assets</b>	<b>9,747</b>	<b>9,001</b>	<b>-</b>	<b>(2,826)</b>
Goodwill	6,618	6,619	-	-
Impaired from given loan	-	-	-	2,826
Inventory consolidation - margin elimination	-	-	-	-
<b>Carrying amount of the investment</b>	<b>16,365</b>	<b>15,620</b>	<b>-</b>	<b>-</b>
<b>The joint venture's statement of profit or loss:</b>				
Net revenue	117,424	96,890	-	17,890
Profit/(loss) from operations	8,464	13,243	-	(6,072)
Net income attributable to equity holders	3,765	10,024	-	(9,228)
<b>Group's share of reported profit/(loss) for the year</b>	<b>926</b>	<b>2,466</b>	<b>-</b>	<b>(4,522)</b>
MRP	(216)	62	-	-
Gain from sale of the investment	-	-	15,526	-
<b>Group's share of profit/(loss) for the year after consolidation</b>	<b>710</b>	<b>2,528</b>	<b>15,526</b>	<b>(4,522)</b>

\* ENEOS MOL Synthetic Rubber (EMSR) Zrt. was sold on January 30, 2025.

## 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 Chemchemical 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 significant influence on Pearl's operations, the company is treated as an associated company and is consolidated using the equity method accordingly.

### 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.

### Meroco a.s.

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.

Below tables include the most relevant associates for the Group:

	Pearl Petroleum Ltd.		Ural Group Limited		Meroco a.s.	
	2025	2024	2025	2024	2025	2024
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>The associate's statement of financial position:</b>						
Non-current assets	909,578	1,067,946	102,922	129,620	8,212	9,005
Current assets	216,910	374,207	19,194	11,972	17,653	22,147
Non-current liabilities	164,288	274,517	34,258	43,105	5,447	5,796
Current liabilities	58,702	109,428	36,711	38,321	8,241	11,357
<b>Net assets</b>	<b>903,498</b>	<b>1,058,208</b>	<b>51,147</b>	<b>60,166</b>	<b>12,177</b>	<b>13,999</b>
Proportion of the Group's ownership at year end	10%	10%	27.5%	27.5%	25%	25%
<b>Group's share of assets</b>	<b>90,350</b>	<b>105,821</b>	<b>14,065</b>	<b>16,546</b>	<b>3,044</b>	<b>3,500</b>
Goodwill	92,673	111,065	-	-	-	-
Accumulated impairment	(21,507)	(25,775)	-	-	-	-
Impaired from given loan	-	-	-	-	-	-
Dividend received over impairment	-	-	-	-	-	-
<b>Carrying amount of the investment</b>	<b>161,516</b>	<b>191,111</b>	<b>14,065</b>	<b>16,546</b>	<b>3,044</b>	<b>3,500</b>
<b>The associate's statement of profit or loss:</b>						
Net revenue	219,031	234,643	33,436	33,315	57,621	55,995
Profit/(loss) from operations	135,785	160,268	81	8,698	(684)	1,344
Net income attributable to equity holders	133,416	171,698	1,324	12,238	(1,238)	1,143
<b>Group's share of reported profit/(loss) for the year</b>	<b>13,342</b>	<b>17,169</b>	<b>364</b>	<b>3,365</b>	<b>(310)</b>	<b>286</b>
Movements on impairment	-	(2,104)	-	-	-	-
<b>Group's share of consolidated profit/(loss) for the year</b>	<b>13,342</b>	<b>15,065</b>	<b>364</b>	<b>3,365</b>	<b>(310)</b>	<b>286</b>

## 7. 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 2025 and 31 December 2024 include the following components:

	2025	2024
	HUF million	HUF million
Current corporate income tax and industry taxes	110,893	77,849
Minimum GloBE tax	81	145
Windfall tax	17,994	6,041
Local trade tax and innovation fee	41,423	38,828
Deferred tax expense/(benefit)	(27,511)	22,737
<b>Income tax expense attributable to profit from continuing operation</b>	<b>142,880</b>	<b>145,600</b>
<b>Income tax expense attributable to profit from discontinued operation</b>	<b>-</b>	<b>-</b>
<b>Total income tax expense</b>	<b>142,880</b>	<b>145,600</b>

#### 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 and special levy on manufacturers of petroleum products in Slovakia. MOL Nyrt. would be taxed at an effective rate of 27% in 2025 (2024: 25%) 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 2025 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 mediated 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 2025, deferred tax expense is primarily influenced by changes in tax losses carried forward, changes in temporary differences between the carrying value and tax value of intangible and tangible assets and provisions.

#### Change in tax rates effective from 1 January 2025

The change of corporate income tax rate from 21% to 24% in Slovakia and from 20% to 25% in Russia from 1 January 2025 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 2025 and 31 December 2024 in the consolidated statement of financial position consist of the following items by categories:

	2025	2024
	HUF million	HUF million
Property, plant and equipment and intangible assets	(141,273)	(129,010)
Statutory tax losses carried forward	21,046	24,844
Provisions	135,033	103,108
Elimination of intragroup transactions	35,078	32,538
Other temporary differences *	(56,636)	(73,774)
<b>Net deferred tax (liability)/asset</b>	<b>(6,752)</b>	<b>(42,294)</b>
<i>of which:</i>		
Total deferred tax assets	154,949	135,262
Total deferred tax liabilities	(161,701)	(177,556)

\*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 154,949 million deferred tax assets HUF 79,184 million at MOL Nyrt. and HUF 11,493 million at INA d.d. relates to timing differences of provisions. Besides that, HUF 28,582 million relates to temporary differences on intangible and tangible assets at INA d.d. Additionally, HUF 17,615 million relates to deferred tax on tax losses carried forward at MOL Nyrt.

Total deferred tax liabilities of HUF 161,701 million include temporary differences on intangible and tangible assets at Slovnaft a.s. (HUF 69,879 million), MOL Azerbaijan Ltd. (HUF 44,669 million), FGSZ Zrt. (HUF 16,481 million) and MPK Zrt. (HUF 15,830 million). Deferred tax liabilities also include HUF 26,329 million (MOL Azerbaijan Ltd.) impact of fair value adjustment of tangible assets recognised upon acquisition.

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

	2025	2024
	HUF million	HUF million
Net deferred tax (liability)/asset as at 1 January	(42,294)	(11,944)
Acquisition of business	(1,978)	(3,014)
Recognised in statement of profit or loss from continuing operation	27,511	(22,737)
Recognised directly in equity (as other comprehensive income)	(7,256)	4,332
Exchange difference	12,366	(8,932)
Deferred tax classified as held for sale	4,899	(118)
Sale of business	-	-
Other	-	119
<b>Net deferred tax (liability)/asset at 31 December</b>	<b>(6,752)</b>	<b>(42,294)</b>

The amount recognised in the statement of profit or loss as a deferred tax benefit is mainly driven by changes related to MOL Nyrt. (HUF 13,225 million benefit), MOHU Zrt. (HUF 4,084 million benefit), INA d.d. (HUF 3,454 million benefit) and MOL Aréna Kft. (HUF 3,215 million).

#### Change in tax rates effective from 1 January 2026

The decrease in the industry tax rate from 41% to 31% in Hungary effective from 1 January 2026, 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.

	2025	2024
	HUF million	HUF million
Profit before tax per consolidated statement of profit or loss from continuing operation	482,821	542,303
Profit before tax per consolidated statement of profit or loss from discontinued operation	-	(40,893)
Profit before tax per consolidated statement of profit or loss	482,821	501,410
Less: share of profit of joint ventures and associates	(23,937)	(24,347)
Income before taxation and share of profit of joint ventures and associates	458,884	477,063
Tax expense at the applicable tax rate (9%)	41,300	42,936
Change in recognition of prior year tax losses carried forward	16,483	4,362
Current year losses not recognised as deferred tax asset	(22,755)	7,883
Differences in tax rates at subsidiaries	31,391	28,670
Other tax expenses (local trade tax, extra profit tax, industry tax)	86,080	48,234
Non-taxable income	(2,942)	(3,562)
Tax allowance available	(108)	(72)
Permanent differences (tax value - IFRS value)	(5,209)	15,483
Effect of tax audits	(1,360)	1,666
Total income tax expense for the year	142,880	145,600
Income tax expense reported in the statement of profit or loss	142,880	145,600
Income tax attributable to discontinued operation	-	-
Effective tax rate	30%	29%

#### e) Income tax recognised in other comprehensive income

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

	2025	2024
	HUF million	HUF million
Net gain/(loss) on hedge of a net investment	(5,026)	5,855
Revaluations of debt instruments at fair value through other comprehensive income	318	229
Revaluations of equity instruments at fair value through other comprehensive income	(3,188)	(1,281)
Revaluations of financial instruments treated as cash flow hedges	(41)	(543)
Equity recorded for actuarial gain/(loss) on provision for retirement benefit obligation	681	72
Total income tax recognised in other comprehensive income	(7,256)	4,332

#### 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:

	2025	2024
	HUF million	HUF million
Tax losses - indefinite expiry	42,039	46,462
Tax losses - expiry within 5 years	79,926	69,937
Tax losses - expiry after 5 years	190	257
Other temporary differences	3,276	4,039
Total unrecognised deferred tax asset	125,431	120,695

Other line include HUF 3,147 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 10,754 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 Country-by-Country Report (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 Effective Tax Rate (ETR) that equals or exceeds an agreed rate; or (iii) no excess profits after excluding routine profits.

With the exception of seven countries (Bosnia and Herzegovina, Croatia, Egypt, Ireland, Serbia, Italy and the Netherlands), all jurisdictions where the Group operates are covered by the transitional CbCR safe harbours. These seven countries fall under the detailed GloBE calculation. Based on the detailed calculation the GloBE effective tax rate is above 15% in Croatia, Egypt, Serbia, Italy and the Netherlands, while it is under 15% in Bosnia and Herzegovina and Ireland. In the latter two countries this results in top-up-tax liability.

In Bosnia and Herzegovina the ETR is 11.68% after 2025, that results in a top-up tax of 3.32%. 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 61 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 20 million. The Group's total current tax expense related to Pillar Two income taxes is HUF 81 million.

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

## 8. 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	(273,256)	251,402
Recycling reserves from OCI to profit or loss due to disposal	1,200	(443)
<b>Exchange differences on translating continuing foreign operations, net of tax</b>	<b>(272,056)</b>	<b>250,959</b>

Translation reserve has decreased compared to the previous year due to HUF strengthened 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	18,350	(25,412)
Income tax effect	(5,026)	5,855
<b>Net investment hedge, net of tax</b>	<b>13,324</b>	<b>(19,557)</b>

## 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	(874)	(759)
Income tax effect	318	229
<b>Changes in fair value of debt instruments at fair value through other comprehensive income, net of tax</b>	<b>(556)</b>	<b>(530)</b>

## 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	38,598	13,309
Income tax effect	(3,188)	(1,281)
<b>Changes in fair value of equity instruments at fair value through other comprehensive income, net of tax</b>	<b>35,410</b>	<b>12,028</b>

## 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	458	(138)
Income tax effect	(41)	(543)
<b>Changes in fair value of cash flow hedges, net of tax</b>	<b>417</b>	<b>(681)</b>

## 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	(2,208)	25
Income tax effect	681	72
<b>Remeasurement of post-employment benefit obligations</b>	<b>(1,527)</b>	<b>97</b>

## 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.

	2025	2024
	HUF million	HUF million
Gains/(losses) arising during the year	(15,214)	13,200
<b>Share of other comprehensive income of associates and joint ventures</b>	<b>(15,214)</b>	<b>13,200</b>

## 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.

### 9. 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 buildings	Machinery and equipment	Other machinery and equipment	Construction in progress	Total
	HUF million	HUF million	HUF million	HUF million	HUF million
<b>At 1 Jan 2024</b>					
Gross book value	5,708,367	3,594,515	552,014	1,018,691	<b>10,873,587</b>
Accumulated depreciation and impairment	(3,734,422)	(2,803,629)	(310,718)	(18,089)	<b>(6,866,858)</b>
<b>Net book value</b>	<b>1,973,945</b>	<b>790,886</b>	<b>241,296</b>	<b>1,000,602</b>	<b>4,006,729</b>
<i>From this net value of assets held for sale</i>	<i>(7,540)</i>	<i>(829)</i>	<i>(559)</i>	<i>-</i>	<i>(8,928)</i>
					<b>3,997,801</b>
<b>Net book value - at 1 Jan 2024</b>	<b>1,973,945</b>	<b>790,886</b>	<b>241,296</b>	<b>1,000,602</b>	<b>4,006,729</b>
Additions and capitalisations	556,318	443,609	94,781	(334,728)	<b>759,980</b>
Acquisition of subsidiaries	43,496	111,005	2,389	6,328	<b>163,218</b>
Depreciation for the year	(235,036)	(165,986)	(48,154)	-	<b>(449,176)</b>
Impairment	(28,743)	(5,107)	(189)	(5,836)	<b>(39,875)</b>
Reversal of impairment	8,348	3,836	46	35	<b>12,265</b>
Disposals	(7,855)	(1,076)	(3,931)	(271)	<b>(13,133)</b>
Disposal of subsidiaries	-	-	(5)	-	<b>(5)</b>
Exchange differences	122,585	32,469	9,380	28,298	<b>192,732</b>
Transfers and other movements	11,877	(814)	(1,666)	(8,055)	<b>1,342</b>
<b>Closing net book value</b>	<b>2,444,935</b>	<b>1,208,822</b>	<b>293,947</b>	<b>686,373</b>	<b>4,634,077</b>
<b>At 31 Dec 2024</b>					
Gross book value	6,664,407	4,246,996	651,170	703,638	<b>12,266,211</b>
Accumulated depreciation and impairment	(4,219,472)	(3,038,174)	(357,223)	(17,265)	<b>(7,632,134)</b>
<b>Net book value</b>	<b>2,444,935</b>	<b>1,208,822</b>	<b>293,947</b>	<b>686,373</b>	<b>4,634,077</b>
<i>From this net value of assets held for sale</i>	<i>(674)</i>	<i>(632)</i>	<i>-</i>	<i>-</i>	<i>(1,306)</i>
					<b>4,632,771</b>
<b>Net book value - at 1 Jan 2025</b>	<b>2,444,935</b>	<b>1,208,822</b>	<b>293,947</b>	<b>686,373</b>	<b>4,634,077</b>
Additions and capitalisations	201,517	360,673	45,998	9,728	<b>617,916</b>
Acquisition of subsidiaries	5,765	6,148	20	499	<b>12,432</b>
Depreciation for the year	(256,032)	(213,895)	(46,149)	-	<b>(516,076)</b>
Impairment	(42,254)	(5,357)	(175)	(5,195)	<b>(52,981)</b>
Reversal of impairment	7,243	239	-	244	<b>7,726</b>
Disposals	(983)	(550)	(2,084)	(171)	<b>(3,788)</b>
Disposal of subsidiaries	(284)	(157)	(27)	(17)	<b>(485)</b>
Exchange differences	(145,234)	(29,856)	(4,718)	(22,801)	<b>(202,609)</b>
Transfers and other movements	68,743	17,462	(80,155)	(5,290)	<b>760</b>
<b>Closing net book value</b>	<b>2,283,416</b>	<b>1,343,529</b>	<b>206,657</b>	<b>663,370</b>	<b>4,496,972</b>
<b>At 31 Dec 2025</b>					
Gross book value	6,564,030	4,445,969	571,050	681,052	<b>12,262,101</b>
Accumulated depreciation and impairment	(4,280,614)	(3,102,440)	(364,393)	(17,682)	<b>(7,765,129)</b>
<b>Net book value</b>	<b>2,283,416</b>	<b>1,343,529</b>	<b>206,657</b>	<b>663,370</b>	<b>4,496,972</b>
<i>From this net value of assets held for sale</i>	<i>(6,353)</i>	<i>(108,881)</i>	<i>(18,638)</i>	<i>(1,508)</i>	<i>(135,380)</i>
					<b>4,361,592</b>

In 2025 and 2024 the following asset acquisitions took place:

#### Acquisition of land in Budapest

MOL Group signed an agreement on 28 November 2025 to acquire an old factory site located in Budapest, with the purpose of a sport park investment.

#### Acquisition of land in Százhalombatta

MOL Group entered into a sale and purchase agreement on 24 March 2025 to acquire land near Danube Refinery in Százhalombatta to build a modern energy recycling facility in order to be able to utilise the largest possible proportion of waste generated.

#### 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 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.

#### Acquisition of a 66 MWp photovoltaic plant in Hungary

MOL entered into a sales and purchase agreement with Optimum Vogt Kft., a subsidiary of Ib vogt GmbH, to acquire 100% of Naperórmű Farm Kft. on 18 December 2024.

The sole activity of Naperórmű Farm Kft. is to oversee the construction of a 66 MWp photovoltaic plant in Ballószög, Hungary. Construction works are finished, and trial runs started in 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	Machinery and	Other	Total
	HUF million	and related rights	equipment	machinery	
		HUF million	HUF million	and	HUF million
				equipment	
				HUF million	
<b>At 31 Dec 2024</b>					
<b>Net book value of leased assets</b>	<b>68</b>	<b>179,035</b>	<b>34,932</b>	<b>18,422</b>	<b>232,457</b>
<b>Period ended 31 Dec 2025</b>					
Additions and capitalisations	73	16,969	46,765	15,146	78,953
Depreciation for the period	(25)	(12,066)	(12,202)	(3,776)	(28,069)
Impairment, termination	(4)	(16,928)	(15,767)	(7,044)	(39,743)
Transfer from non-leasing asset category	-	-	57,458	-	57,458
<b>Closing net book value</b>	<b>112</b>	<b>167,010</b>	<b>111,186</b>	<b>22,748</b>	<b>301,056</b>
From this net value of assets held for sale	-	(2,211)	(69,459)	-	(71,670)
					<b>229,386</b>

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 18,434 million in 2025 (2024: HUF 31,176 million). In 2025 the applicable capitalisation rate (including the impact of foreign exchange differences) has been 3.21% (2024: 5.01%).

## 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 2025 property, plant and equipment includes assets with a value of HUF 28,756 million (2024: HUF 28,987 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 11,006 million as of 31 December 2025 (31 December 2024: HUF 11,554 million). Further significant amounts are the assets of FGSZ Zrt. 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.

	2025	2024
	HUF million	HUF million
<b>At 1 January</b>	<b>28,987</b>	<b>24,570</b>
Asset related government grants received	3,550	5,875
Release of deferred grants	(3,350)	(1,848)
Foreign exchange differences	(431)	390
<b>At 31 December (see Note 17 and 18)</b>	<b>28,756</b>	<b>28,987</b>

## Non-current assets pledged as security

The carrying amount of non-currents assets pledged as security for liabilities is HUF 65,168 million as of 31 December 2025 (2024: HUF 85,156 million) which relates to the MOL Fleet Solution Flottakezelő Kft. 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 2025 for investment property is HUF 1,403 million operating expense and HUF 4,288 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:

	2025	2024
	HUF million	HUF million
<b>Opening gross carrying amount</b>	<b>93,759</b>	<b>82,390</b>
<b>Opening accumulated depreciation</b>	<b>(75,147)</b>	<b>(66,431)</b>
<b>Opening carrying amount</b>	<b>18,612</b>	<b>15,959</b>
Addition from acquisitions	201	56
Depreciation	(679)	(734)
Exchange differences	(1,032)	1,018
Transfer to / from tangible fixed assets (net value)	1,434	1,967
Other changes (net value)	(664)	346
<b>Closing gross carrying amount</b>	<b>90,034</b>	<b>93,759</b>
<b>Closing accumulated depreciation</b>	<b>(72,162)</b>	<b>(75,147)</b>
<b>Closing carrying amount</b>	<b>17,872</b>	<b>18,612</b>



The fair value of investment property is HUF 92,208 million as of 31 December 2025. 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 2025.

### **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 cannot be 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
<b>At 1 Jan 2024</b>					
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)
<b>Net book value</b>	<b>174,455</b>	<b>33,914</b>	<b>120,057</b>	<b>197,629</b>	<b>526,055</b>
<i>From this net value of assets held for sale</i>	-	-	-	(486)	(486)
					<b>525,569</b>
<b>Net book value - at 1 Jan 2024</b>	<b>174,455</b>	<b>33,914</b>	<b>120,057</b>	<b>197,629</b>	<b>526,055</b>
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)
<b>Closing net book value</b>	<b>121,526</b>	<b>44,628</b>	<b>125,243</b>	<b>226,043</b>	<b>517,440</b>
<b>At 31 Dec 2024</b>					
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)
<b>Net book value</b>	<b>121,526</b>	<b>44,628</b>	<b>125,243</b>	<b>226,043</b>	<b>517,440</b>
<i>From this net value of assets held for sale</i>	-	-	-	-	-
					<b>517,440</b>
<b>Net book value - at 1 Jan 2025</b>	<b>121,526</b>	<b>44,628</b>	<b>125,243</b>	<b>226,043</b>	<b>517,440</b>
Additions	173,560	19,351	18,907	-	211,818
Acquisition of subsidiary	110	91	2,326	1,148	3,675
Amortisation for the year	(18,279)	(7,896)	(1,159)	-	(27,334)
Impairment	(1,942)	(759)	(6,437)	(42,857)	(51,995)
Reversal of impairment	-	-	45	-	45
Disposals	(111,770)	(451)	-	-	(112,221)
Disposal of subsidiaries	-	-	-	-	-
Exchange differences	(7,313)	(536)	(13,792)	(27,346)	(48,987)
Transfers and other movements	14,006	(10,928)	(9,144)	-	(6,066)
<b>Closing net book value</b>	<b>169,898</b>	<b>43,500</b>	<b>115,989</b>	<b>156,988</b>	<b>486,375</b>
<b>At 31 Dec 2025</b>					
Gross book value	359,588	132,241	203,086	312,646	1,007,561
Accumulated amortisation and impairment	(189,690)	(88,741)	(87,097)	(155,658)	(521,186)
<b>Net book value</b>	<b>169,898</b>	<b>43,500</b>	<b>115,989</b>	<b>156,988</b>	<b>486,375</b>
<i>From this net value of assets held for sale</i>	(150)	(50)	-	-	(200)
					<b>486,175</b>

## Goodwill

### Accounting policies

Goodwill shall 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:

- 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.
- 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:

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
<b>Goodwill (net book value)</b>		
<b>Upstream</b>	<b>71,559</b>	<b>137,152</b>
ACG field	71,559	137,152
<b>Midstream</b>	<b>1,148</b>	<b>-</b>
Gas-trade	1,148	-
<b>Consumer services</b>	<b>71,390</b>	<b>75,206</b>
Slovenian network	21,961	23,368
Polish retail network	-	-
Croatian retail network	19,026	20,245
Czech retail network	9,390	9,615
Hungarian retail network	7,972	7,972
Slovak retail network	8,076	8,594
Romanian retail network	4,965	5,412
<b>Downstream</b>	<b>11,921</b>	<b>12,653</b>
Austrian wholesale and logistic	9,808	10,435
German plastic compounder	1,636	1,741
MOL Petrochemicals	477	477
<b>Corporate</b>	<b>970</b>	<b>1,032</b>
Croatian oil field services	970	1,032
Other production facilities	-	-
<b>Total goodwill</b>	<b>156,988</b>	<b>226,043</b>

## 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 2025 is HUF 1,815 million (2024: HUF 5,150 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 1,733 million in 2025 (2024: HUF 1,058 million).

## Write-offs of dry-holes

	2025	2024
Dry-holes	HUF million	HUF million
Hungary	873	-
Croatia	2,354	275
Pakistan	-	903
Egypt	414	511
<b>Total</b>	<b>3,641</b>	<b>1,689</b>

Nkö-É-1 well in Hungary, Ras Qattara in Egypt, Gola 4 and further 3 wells in Drava 03 exploration concession in Croatia were classified as dry in 2025.

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.

## d) 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 obsolescence 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.

## e) 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.

2025 key assumptions for impairment testing (nominal terms)	2026-2028 (average)	2029-2031 (average)	2032	2040	2050
Brent oil price (USD/bbl)	65	83	90	106	121
TTF Gas price (EUR/MWh)	35	37	37	37	40
CO2 price EUA (EUR/t)	80	112	124	151	194
MOL Group refinery margin (USD/bbl)	3.2	4.22	4.65	2.91	1.75
MOL Group petrochemical margin (EUR/t)	225	364	417	411	508

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

### 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. CO2 quota prices beyond the planning horizon are modelled by the projected ETS EUA demand-supply balance capped by the projected breakeven prices of decarbonization projects deemed necessary to comply with EU green deal targets.

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 -25% 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. ESG scores are provided by several rating agencies. These ESG scores of each company in the peer group, were collected and compared to MOL's one. As MOL has similar 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 2025, 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) - 2025*	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	2,947	5,186	951	980	825	116	11,005
Poland	-	23	34,188	-	272	-	34,483
Azerbaijan	42,918	-	-	-	-	-	42,918
Croatia	4,574	7	16	-	14	-	4,611
Slovakia	-	(61)	100	-	160	-	199
Other	(59)	5	402	-	-	-	348
<b>Total</b>	<b>50,380</b>	<b>5,160</b>	<b>35,657</b>	<b>980</b>	<b>1,271</b>	<b>116</b>	<b>93,564</b>

\*Including the intersegment impact

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	0	-	-	-	0	-	0
Croatia	5,286	264	67	-	(752)	-	4,865
Pakistan	0	-	-	-	-	-	0
Slovakia	-	1,023	(224)	-	(62)	-	737
Other	(28)	70	130	0	7	-	179
<b>Total</b>	<b>19,889</b>	<b>7,342</b>	<b>261</b>	<b>50</b>	<b>1,970</b>	<b>130</b>	<b>29,642</b>

\*Including the intersegment impact

In 2025 and 2024 impairment was accounted in:

- ▶ Upstream segment for production fields and for assets under construction.
  - In Azerbaijan impairment was recorded on the non-amortisable goodwill related to Azeri-Chirag-Gunashli oil field in 2025 as a result of the depletion of the field.
  - In Croatia impairment was recognised on Benicanci gas field, Irina, Vuckovec and Mosti fields and on East Damanhur gas field located in Egypt.
  - In Hungary in 2025 impairment was recorded on Gomba-Demjén region mainly due to decrease in forecast volumes partially offset by impairment reversal in Zala region.
  - 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.
- ▶ Downstream segment mainly for unutilised refinery assets.
  - In Hungary impairment of HUF 1.307 million was recognised mainly on Danube Refinery's AV3 crude distillation unit in 2025.
  - In Hungary impairment was recorded on
    - assets under construction, and
    - PE and PP recycling assets in 2024.
- ▶ Consumer services mainly for machineries and equipment in filling stations.
  - In Poland impairment was recognised on service stations in 2025 as a result of change in long-term fuel sale expectations.
  - 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.
- ▶ 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.

## 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 USD nominated post-tax discount rates used for the impairment tests in 2025 were in the range from 7.1% to 17.6%.
- ▶ The pre-tax discount rates used in 2025 ranged from 8.7% to 21.5% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- ▶ 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 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 2026-2028 and extrapolates cash flows for the following years based on an USD/EUR/HUF inflation rate varying between 2% and 4.5%.

## 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	(129,071)
+10% case	129,409
Natural gas price sensitivity	
-10% case	(63,970)
+10% case	64,594
Discount rate sensitivity	
-1%point	75,466
+1%point	(68,669)



## 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 USD nominated post-tax discount rates used for the impairment tests in 2025 were in the range from 6.4% to 9.4%.
- ▶ The pre-tax discount rates in 2025 ranged from 7.3% to 9.7% depending on the risk premium and the applicable tax rate in the geographic location of the CGU.
- ▶ 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 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 2026-2028 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 4.5%.

## 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	(2,811)
+1USD/bbl / +100EUR/t case	2,811
Brent oil price sensitivity	
-10% case	563
+10% case	(563)
Natural gas price sensitivity	
-10% case	341
+10% case	(341)
CO2 quota price sensitivity	
+40 EUR/t case	(1,194)
Discount rate sensitivity	
-1%point	1,234
+1%point	(1,034)

## f) 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 post-tax discount rates and

the growth rates during the period. 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.

Impairment was recorded on goodwill related to Azeri-Chirag-Gunashli ("ACG") oil field in 2025.

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 7.1%.

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 8.7%.

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 488,842 million.
- ▶ The book value of assets including goodwill is HUF 488,842 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 33,065 million, 1 percentage point decrease results in an increase of HUF 37,147 million in the NPV.
  - 5 USD growth in oil price indicates an increase of HUF 31,693 million, 5 USD drop in oil price indicates a decrease of HUF 31,660 million in NPV.
  - +1 percentage point alteration in production indicates HUF 5,303 million difference and -1 percentage point change would result in HUF 5,326 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 6.4% and 7.4% in current year.

Pre-tax discount rates range from 7.3% to 7.8% 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 2026-2028 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 4.5%.

### 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 7.0% and 9.0% in current year.

Pre-tax discount rates range from 8.5% to 10.3% 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 2026-2028 and extrapolates cash flows for the following years based on an estimated USD/EUR/HUF inflation rates varying between 2% and 4.5%.

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 184,227 million.
- ▶ The book value of assets including goodwill is HUF 124,227 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 13,389 million, 1 percentage point decrease results in an increase of HUF 15,156 million in the NPV.
- +/- 1 percentage point alteration in gross margin indicates HUF 3,619 million difference in NPV.
- +/- 1 percentage point alteration in fuel volume sold indicates HUF 1,441 million difference in NPV.
- +/- 1 percentage point alteration in OPEX indicates HUF 2,242 million difference in NPV.

#### Gas Midstream and Corporate and other

No impairment was recognised on goodwill in 2025 and in 2024.

### 10. Business combinations and 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

A business combination involving entities or businesses under common control is a business combination in which all of the combining entities or businesses are ultimately controlled by the same party or parties both before and after the business combination, and that control is not transitory.

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 Central Eastern European Gas Exchange Zrt.

FGSZ Földgázszállító Zrt. has purchased a 51% stake in Central Eastern European Gas Exchange Zrt. (CEEGEX). The transaction was completed on 17 December 2024. On 15 October 2025 FGSZ Földgázszállító Zrt. has further increased its stake to 74,8% in CEEGEX. The transaction is not material for the Group.

#### Acquisition of waste management business in Budapest region

MOL Nyrt. and BKM Zrt., 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 Zrt. and became 50% owner of MOHU Budapest. MOL Nyrt. 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.

1 April 2024

MOHU Budapest Zrt.

HUF million

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

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:

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

**Acquisition of Mercarius Flottakezelő Kft.**

On 15 November 2024, MOL Group signed an agreement with one of Hungary's largest and fastest growing fleet management companies, Mercarius Flottakezelő Kft. Under this agreement, MOL Fleet Solution and Mercarius created a joint holding company, which will continue to operate under the name MOL Mercarius. The transaction was closed on 17 December 2024.

Based on MOL management's decision regarding the upcoming restructuring of the control of fleet business, the assets and liabilities are recognised as assets held for sale in 2025 in accordance with IFRS 5.

17 December 2024

**Mercarius Flottakezelő Kft.**

HUF million

<b>Non-current assets</b>	<b>85,719</b>
Intangible assets	133
Property, plant and equipment	84,570
Other financial assets (non-current)	1,006
Other non-current asset	10
<b>Current assets</b>	<b>14,973</b>
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
<b>Assets classified as held for sale</b>	<b>421</b>
<b>Non-current liabilities</b>	<b>(50,910)</b>
Non-current provisions	(120)
Long-term debt	(45,591)
Other non-current liabilities	(635)
Deferred tax liability	(4,564)
<b>Current liabilities</b>	<b>(20,578)</b>
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)
<b>Net assets</b>	<b>29,625</b>
<b>Of which minority's part</b>	<b>19,751</b>
<b>Acquired net assets</b>	<b>9,874</b>
<b>Goodwill on acquisition</b>	
Fair value of consideration transferred	9,482
Less: fair value of identifiable net assets acquired	(9,874)
<b>Goodwill on acquisition</b>	<b>(392)</b>
<b>Net cash outflow on acquisition of subsidiaries</b>	
Cash and cash equivalent balances acquired	(7,457)
<b>Net cash outflow</b>	<b>(7,457)</b>

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 Kft.**

On 6 February 2024, MOL Group entered into an agreement with Újpest Labdarúgó Kft. as direct owner to acquire Új Lila Labdarúgó Kft., 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.

**Acquisition of Endrőd gas plant**

MOL entered into a sale and purchase agreement on 17 December 2024 with O&GD Central Kft. 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 closed on 31 March 2025.

**Acquisition of business lines from Metal Shredder Hungary Zrt.**

On 20 November 2024, MOL signed an agreement to acquire a business that can extract precious metals from e-waste (Waste from Electrical and Electronic Equipment) with high efficiency using its patented hydrometallurgy technology in Hungary. The transaction comprises two business lines, the first of which was closed on 1 April 2025 and the second was closed on 1 August 2025.

Based on MOL management's decision, the assets are recognised as assets held for sale in accordance with IFRS 5. For further information please refer to Note 19.

### c) Ongoing acquisitions

#### Acquisition of Polsolar Kft.

On 4 December 2025 MOL Group entered into a sale and purchase agreement to acquire Polsolar Kft., holding 5 fully operational solar farms near Mezőcsát in Eastern Hungary. The 5 solar farms have a combined capacity of 304 MWp and altogether generate sufficient electricity to supply approximately 170 thousand Hungarian households. The assets are operated under the “KÁT” feed-in tariff system in Hungary, with KÁT licenses in place until 2048.

The transaction is expected to close in Q1 2026 subject to regulatory approval.

#### Acquisition of TAPPE Kft.

On 2 December 2025 MOL Group signed an agreement regarding the acquisition of TAPPE Kft., the regional waste management coordinator of the Tiszántúl region in Hungary. TAPPE's services cover the full range of public service waste management value chain (including collecting, transporting, sorting, composting, transfer stations, mechanical-biological processing and DRS bottle/container returns), handling around 12% of total municipal solid waste of Hungary. Additionally, TAPPE handles winter road maintenance and public sanitation.

The integration of a regional coordinator enhances efficiency in reducing the amount of waste sent to landfill, optimizing logistics and resource allocation and ensures compliance with concession standards.

The transaction is expected to close in Q1 2026 subject to approval by the Hungarian Competition Authority and customary purchase price adjustments.

## 11. 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 2025		31 Dec 2024	
	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	422,724	416,369	532,249	526,219
Purchased crude oil	161,223	160,890	182,488	182,164
Other goods for resale	114,275	110,661	88,618	87,802
Other raw materials	113,514	91,031	104,239	82,587
Purchased natural gas	1,631	1,631	1,755	1,755
Inventories classified as held for sale	(369)	(369)	-	-
<b>Total</b>	<b>812,998</b>	<b>780,213</b>	<b>909,349</b>	<b>880,527</b>

During the year 2025, the Group recognised inventories in the amount of HUF 6,471,932 million as an expense. This amount includes inventory impairment of HUF 22,414 million (2024: HUF 17,917 million), primarily relating to raw materials.

The value of inventories was affected by the weakening USD rates and lower sales volumes.

#### Inventories pledged as security

The carrying amount of inventories pledged as security for liabilities is HUF 312 million as of 31 December 2025 (2024: HUF 1,583 million).

## 12. 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 Nyrt. 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 2025	31 Dec 2024
INA-Industrija nafte d.d.	51%	51%
	31 Dec 2025	31 Dec 2024
Accumulated balances of material non-controlling interest	353,793	365,158
Profit/(Loss) allocated to material non-controlling interest	13,230	56,080

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

	2025	2024
	HUF million	HUF million
<b>Summarised statement of profit or loss</b>		
Total operating income	1,544,472	1,551,439
Total operating expenses	(1,465,931)	(1,470,530)
Finance income/(expense), net	(3,090)	(4,882)
<b>Profit/(loss) before income tax</b>	<b>75,451</b>	<b>76,027</b>
Income tax (expense)/income	(13,005)	(13,923)
<b>Profit/(loss) for the year</b>	<b>62,446</b>	<b>62,104</b>
<b>Total comprehensive income</b>	<b>25,982</b>	<b>110,138</b>
Attributable to non-controlling interests	13,230	56,080
Dividends paid to non-controlling interests	(24,594)	(48,595)

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
<b>Summarised statement of financial position</b>		
Current assets	362,891	357,168
Non-current assets	1,057,634	1,100,378
<b>Total assets</b>	<b>1,420,525</b>	<b>1,457,546</b>
Current liabilities	(488,294)	(391,117)
Non-current liabilities	(237,402)	(349,280)
<b>Total liabilities</b>	<b>(725,696)</b>	<b>(740,397)</b>
<b>Total equity</b>	<b>694,829</b>	<b>717,149</b>
Attributable to owners of parent	341,036	351,991
Attributable to non-controlling interest	353,793	365,158

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
<b>Summarised cash flow information</b>		
Cash flows from operations	138,925	115,339
Cash flows used in investing activities	(90,696)	(114,691)
Cash flows used in financing activities	(28,330)	(20,891)
<b>Increase/(decrease) in cash and cash equivalents</b>	<b>19,899</b>	<b>(20,243)</b>



### 13. Disposals

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

### 14. Other non-current assets

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
Obligatory level of inventory required by state legislations	50,725	45,808
Advance payments for assets under construction	24,843	28,037
Prepaid fees of long-term rental fees	269	352
Advance payments for intangible assets	451	39
Other	288	707
<b>Total</b>	<b>76,576</b>	<b>74,943</b>

### 15. Other current assets

	31Dec 2025	31 Dec 2024
	HUF million	HUF million
Prepaid and recoverable taxes and duties (excluding income taxes)	111,621	93,668
Advance payments	24,132	27,848
Prepaid expenses	19,131	18,109
Dividend receivable	234	246
Other	1,124	993
<b>Total</b>	<b>156,242</b>	<b>140,864</b>

Other item contains mainly revenue accruals and receivables regarding employees.

### 16. 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<sub>2</sub> 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.

	Environmental	Field abandonment	Redundancy	Long-term employee benefits	Legal claims	Emission quotas and other	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>Balance as of 1 Jan 2024</b>	<b>75,344</b>	<b>417,869</b>	<b>1,907</b>	<b>40,286</b>	<b>4,156</b>	<b>132,401</b>	<b>671,963</b>
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	-	-	-	-	-	-	-
<b>Balance as of 31 Dec 2024</b>	<b>80,696</b>	<b>554,996</b>	<b>1,424</b>	<b>42,221</b>	<b>3,411</b>	<b>142,106</b>	<b>824,854</b>
Acquisition / (sale) of subsidiaries	(599)	(55)	-	-	-	-	(654)
Additions and revision of previous estimates	3,961	(11,272)	462	7,707	1,348	112,508	114,714
Unwinding of the discount	3,109	34,847	-	1,699	-	884	40,539
Currency differences	(3,799)	(27,346)	(66)	(1,130)	178	(7,893)	(40,056)
Provision used during the year	(8,191)	(292)	(511)	(5,314)	(960)	(89,552)	(104,820)
Other movements	-	-	-	(179)	-	-	(179)
<b>Balance as of 31 Dec 2025</b>	<b>75,177</b>	<b>550,878</b>	<b>1,309</b>	<b>45,004</b>	<b>3,977</b>	<b>158,053</b>	<b>834,398</b>
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
Current portion 31 Dec 2025	6,728	4,538	635	6,861	271	122,319	141,352
Non-current portion 31 Dec 2025	68,449	546,340	674	38,143	3,706	35,734	693,046

### Provision for Environmental expenditures

As of 31 December 2025, provision of HUF 75,177 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 2025 also includes a contingent liability of HUF 19,469 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	(6.7)	(443)	5.6	369
MPK	(10.5)	(766)	7.1	520
INA	(6.6)	(1,051)	7.9	1,248
IES	(34.6)	(1,165)	34.5	1,165
Slovnaft	(37.0)	(7,248)	31.8	6,225
<b>Total</b>		<b>(10,673)</b>		<b>9,527</b>

#### Provision for Field abandonment

As of 31 December 2025, provision of HUF 550,878 million has been made for estimated total costs of plugging and abandoning wells upon termination of production. Approximately 11% of these costs are expected to be incurred between 2026 and 2030 and the remaining 89% between 2031 and 2082. 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 abandonment 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 5.1% and 22.5% 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 16%, while a decommissioning rate lower by one percentage point increases the provision by 21%.

#### 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. 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 271 million remained as of 31 December 2025. At IES S.p.A. HUF 384 million general severance payment provision created as of 31 December 2025 due to local regulations. The closing balance of provision for redundancy is HUF 1,309 million as of 31 December 2025 (31 December 2024: HUF 1,424 million).

#### Provision for Long-term employee benefits

As of 31 December 2025, the Group has recognised a provision of HUF 45,004 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 Zrt. 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.

	2025 HUF million	2024 HUF million
<b>Present value of total long-term employee benefit obligation at the beginning of the year</b>	<b>42,221</b>	<b>40,286</b>
Acquisitions / (disposals)	0	137
Past service cost	201	351
Current service cost	4,564	3,293
Interest costs	1,699	2,133
Provision used during the year	(5,314)	(4,989)
Net actuarial (gain) / loss	2,942	(295)
<i>from which:</i>		
Retirement benefit (See Note 8)	2,208	(25)
Jubilee benefit	734	(270)
Exchange adjustment	(1,130)	1,305
Other movements	(179)	0
<b>Present value of total long-term employee benefit obligation at year end</b>	<b>45,004</b>	<b>42,221</b>

The other movements contain reclassification of liabilities related to assets held for sale.

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:

	2025 HUF million	2024 HUF million
Current service cost	4,564	3,293
Net actuarial (gain)/loss	734	(270)
Past service cost	201	351
<b>Balance as at year end</b>	<b>5,499</b>	<b>3,374</b>

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

	2025	2024
Discount rate in %	2.04 - 7.65	1.96 - 7.48
Average wage increase in %	0.6 - 5.0	0.6 - 7.0
Mortality index (male)	0.03 - 3.01	0.03 - 3.01
Mortality index (female)	0.02 - 1.37	0.02 - 1.33

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

	Retirement benefits		Jubilee benefits	
	2025	2024	2025	2024
	HUF million	HUF million	HUF million	HUF million
Actuarial (gains)/losses arising from changes in demographic assumptions	2,506	(261)	870	(181)
Actuarial (gains)/losses arising from changes in financial assumptions	(431)	396	(208)	(192)
Actuarial (gains)/losses arising from experience adjustments	133	(160)	72	103
<b>Total actuarial (gains)/losses</b>	<b>2,208</b>	<b>(25)</b>	<b>734</b>	<b>(270)</b>

A quantitative sensitivity analysis for significant assumptions as at 31 December 2025 is, as shown below:

	Retirement benefits		Jubilee benefits	
	2025	2024	2025	2024
	HUF million	HUF million	HUF million	HUF million
<b>Discount rate:</b>				
0.5% decrease	954	852	574	579
0.5% increase	(892)	(836)	(549)	(562)
<b>Termination rate:</b>				
50% decrease	4,102	4,609	2,776	3,225
50% increase	(3,123)	(3,327)	(2,205)	(2,470)

#### Provision for legal claims

As of 31 December 2025, provision of HUF 3,977 million (31 December 2024: HUF 3,411 million) has been made for estimated total future losses from litigations.

### Provision for emission quotas and other provisions

As of 31 December 2025, the Group has recognised a provision of HUF 84,671 million for the shortage of emission quotas (31 December 2024: 72,464 million). The amount reported as at 31 December 2025 also includes provision for estimated costs of UER quotas in the amount of HUF 1,797 million (31 December 2024: HUF 5,570 million). For further information regarding the calculation method of estimated cost please refer to the accounting policy section.

As of 31 December 2025, the Group had available 3,503,966 (31 December 2024: 3,431,288) free emission quotas granted by the Hungarian, Croatian and Slovakian authorities. The total emissions during 2025 amounted to equivalent of 5,787,033 tons of emission quotas (2024: 5,487,636 tons).

Other provisions contains a provision for penalty in amount of HUF 6,418 million (EUR 16.7 million) relating to alleged unfulfilled work commitments.

As of 31 December 2025, the Group has recognised a provision of HUF 0 million in relation to IFRS 9 requirements (31 December 2024: HUF 0 million).

## 17. Other non-current liabilities

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
Government grants received (see Note 9)	26,396	26,810
Received and deferred other subsidies	7,173	8,214
Deferred compensation for property, plant and equipment	5,419	3,574
Deferred income for apartments sold	1,357	1,444
Liabilities to government for sold apartments	75	124
Other	5,461	6,405
<b>Total</b>	<b>45,881</b>	<b>46,571</b>

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

## 18. Other current liabilities

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
Taxes, contributions payable (excluding corporate tax any mining royalty)	239,035	243,940
Amounts due to employees	48,846	42,753
Advances from customers	16,411	15,226
Custom fees payable	5,669	8,538
Other accrued incomes	5,993	4,186
Fee payable for strategic inventory storage	2,803	3,077
Government subsidies received and accrued (see Note 9)	2,092	2,177
Dividend payable	994	1,502
Other	2,791	8,173
<b>Total</b>	<b>324,634</b>	<b>329,572</b>

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

## 19. 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 their 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 2025 HUF million	31 Dec 2024 HUF million
Assets		
Property, plant and equipment	135,379	1,306
Intangible assets	199	-
Investment in associated companies and joint ventures	-	-
Other non-current financial assets	2,643	100
Deferred tax assets	-	118
Other non-current assets	31	-
Inventories	369	-
Trade and other receivables	7,080	-
Other current financial assets	5,860	-
Income tax receivable	(6)	-
Cash and cash equivalents	8,809	-
Other current assets	1,475	-
<b>Assets classified as held for sale</b>	<b>161,839</b>	<b>1,524</b>
Liabilities		
Long-term debt	72,945	-
Other non-current financial liabilities	-	-
Non-current provisions	162	-
Deferred tax liabilities	4,782	-
Other non-current liabilities	573	-
Short-term debt	30,681	-
Trade and other payables	1,980	-
Other current financial liabilities	39	-
Current provisions	17	-
Income tax payable	296	-
Other current liabilities	5,041	-
<b>Liabilities related to assets classified as held for sale</b>	<b>116,516</b>	<b>-</b>

As of 31 December 2025 assets held for sale increased to HUF 161,839 million due to management decision on the potential sale of the Group's metal waste processing subsidiaries and fleet management subsidiaries. The management is committed to the sale or divestment of the assets and the transaction is expected to be completed within one year.

As of 31 December 2024, assets held for sale contained mainly service stations located in Hungary and Slovenia.

## 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

In the current reporting period, the Group has not classified any operations as discontinued operation. Comparative figures refer to the sale of the Group's Upstream portfolio in the United Kingdom, where the loss before tax was HUF 40,893 million due to the bankruptcy proceedings of the buyer.

#### 1. Financial performance

	2025	2024
	HUF million	HUF million
Net sales	-	-
Other operating income	-	887
<b>Total operating income</b>	-	<b>887</b>
Raw materials and consumables used	-	-
Employee benefits expense	-	-
Depreciation, depletion, amortisation and impairment	-	-
Other operating expenses	-	41,567
<b>Total operating expenses</b>	-	<b>41,567</b>
<b>Profit from discontinued operation</b>	-	<b>(40,680)</b>
Finance income	-	(213)
Finance expense	-	-
<b>Total finance expense, net</b>	-	<b>(213)</b>
<b>Profit/(Loss) before tax from discontinued operation</b>	-	<b>(40,893)</b>
Income tax expense	-	-
<b>Profit / (Loss) for the period from discontinued operations</b>	-	<b>(40,893)</b>

#### 2. Cash flow information

	2025	2024
	HUF million	HUF million
<b>Profit/(Loss) before tax from discontinued operation</b>	-	<b>(40,893)</b>
<b>Cash flows from operations</b>	-	-
<b>Cash flows used in investing activities</b>	-	<b>1,331</b>
<b>Cash flows used in financing activities</b>	-	-



## 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 through 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 or 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 indicators 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 (like liquidation procedure, or termination without succession etc.) 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.

**20. 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 stabilised well below 1 during 2025, 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 debt ratio exceeds permanently the 30% level, the MOL Group might consider making changes in its capital structure. The ratio is well below the 30% significantly (10.0% in 2025) 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 2025 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 are set by Group Financial Risk Management, 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.

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
<b>The amount of undrawn major committed credit facilities</b>		
Long-term loan facilities available	1,277,466	1,089,836
Short-term facilities available	56,629	57,316
<b>Total loan facilities available</b>	<b>1,334,095</b>	<b>1,147,152</b>
Cash and cash equivalents	360,767	433,610
<b>Total available liquidity</b>	<b>1,694,862</b>	<b>1,580,782</b>

MOL Group Finance Zrt. as borrower and MOL as guarantor signed a EUR 740 million ESG KPI Linked multicurrency revolving credit facility agreement on 11 September 2025. The tenor of the facility is 5 years with two 1-year extension options. Simultaneously, the total available commitment has been cancelled under the EUR 570 million revolving credit facility agreement concluded by MOL Group Finance Zrt. on 26 September 2019, which amount was later increased to EUR 780 million. The agreement was arranged as a club deal with 12 banking groups, with Erste Group Bank AG and OTP Bank Nyrt. as the coordinators. Erste Group Bank AG acts as Facility Agent, and BNP Paribas as Sustainability Coordinator for the agreement. The sustainability targets in the Agreement are aligned with the Shape Tomorrow Strategy of MOL Group and as such the transaction reconfirms the Group's commitment to its long-term strategy.

Maturity profile of financial liabilities based on contractual undiscounted payments	Due				Total
	Due within 1 month	between 1 and 12 months	between 1 and 5 years	Due after 5 years	
<b>31 Dec 2025</b>	HUF million	HUF million	HUF million	HUF million	HUF million
Borrowings	171,499	253,740	593,887	146,231	1,165,357
Transferred "A" shares with put&call options	-	183,259	-	-	183,259
Transferred "A" shares with Total Return Swap	-	20,056	-	-	20,056
Trade and other payables	462,710	342,789	-	-	805,499
Other financial liabilities	735	27,885	17,437	20,172	66,229
<b>Non-derivative financial instruments</b>	<b>634,944</b>	<b>827,729</b>	<b>611,324</b>	<b>166,403</b>	<b>2,240,400</b>
Derivatives	6	30,384	2,155	-	32,545
<b>Total financial liabilities</b>	<b>634,950</b>	<b>858,113</b>	<b>613,479</b>	<b>166,403</b>	<b>2,272,945</b>
Guarantees	287,270	-	-	-	287,270
Undrawn loan commitments**	1,334,095	-	-	-	1,334,095
<b>Total Off-balance sheet commitments*</b>	<b>1,621,365</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,621,365</b>

\* 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 drawdowns made by MOL Group under available revolving credit facilities

Maturity profile of financial liabilities based on contractual undiscounted payments	Due within 1 month	Due between 1 and 12 months	Due between 1 and 5 years	Due after 5 years	Total
31 Dec 2024	HUF million	HUF million	HUF million	HUF million	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
<b>Non-derivative financial instruments</b>	<b>649,785</b>	<b>783,877</b>	<b>867,723</b>	<b>130,463</b>	<b>2,431,848</b>
Derivatives	-	14,750	4,203	-	18,953
<b>Total financial liabilities</b>	<b>649,785</b>	<b>798,627</b>	<b>871,926</b>	<b>130,463</b>	<b>2,450,800</b>
Guarantees	349,357	-	-	-	349,357
Undrawn loan commitments**	1,147,152	-	-	-	1,147,152
<b>Total Off-balance sheet commitments*</b>	<b>1,496,509</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,496,509</b>

\* 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 drawdowns 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:

	2025 HUF billion	2024 HUF billion
<b>Effect on Clean CCS-based* (Current Cost of Supply) profit/(loss) from operation</b>		
<b>Brent crude oil price (change by +/- 10 USD/bbl; with fixed crack spreads and petrochemical margin)</b>		
Upstream	+49,161/-49,161	+43,017/-43,017
Downstream	-12,982/+12,982	-12,793/+12,793
<b>TTF gas price (change by +/- 15 EUR/MWh; with fixed crack spreads and petrochemical margin)</b>		
Upstream	+85,437/-85,437	+69,212/-69,212
Downstream	-60,300/+60,300	-59,700/+59,700
Gas Midstream	-2,479/+2,479	-1,685/+1,685
<b>Exchange rates (change by +/- 15 HUF/USD; with fixed crack spreads)</b>		
Upstream	+14,361/-14,361	+16,609/-16,609
Downstream	+36,900/-36,900	+27,500/-27,500
<b>Exchange rates (change by +/- 15 HUF/EUR; with fixed crack spreads/petrochemical margin)</b>		
Upstream	+7,737/-7,737	+5,922/-5,922
Downstream	+16,600/-16,600	+18,200/-18,200
<b>Refinery margin (change by +/- 1 USD/bbl)</b>		
Downstream	+41,400/-41,400	+38,800/-38,800
<b>Integrated petrochemical margin (change by +/- 100 EUR/t)</b>		
Downstream	+45,900/-45,900	+42,800/-42,800
<b>CO2 price EUA (Change by +/- 10 EUR/t)</b>		
Upstream	-636/+636	-633/+633
Downstream	-9,100/+9,100	-8,000/+8,000

\*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.

### 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 2025 HUF million	31 Dec 2024 HUF million
<b>Long-term debt</b>		
Eurobond €650 million due 2027	249,489	264,952
HUF bond HUF 28,400 million due 2029	28,500	28,528
HUF bond HUF 36,600 million due 2030	35,545	35,347
HUF bond HUF 35,500 million due 2031	35,438	35,430
HUF bond HUF 20,000 million due 2031	20,305	20,306
HRK bond HRK 2,000 million due 2026	0	108,490
Schuldschein €130 million due between 2020-2027	7,700	8,186
Bank loans	76,655	209,519
Finance lease liabilities	199,830	251,105
Other	732	894
<b>Total long-term debt</b>	<b>654,194</b>	<b>962,757</b>
<b>Short-term debt</b>		
Eurobond €650 million due 2027	974	1,038
HUF bond HUF 28,400 million due 2029	150	146
HUF bond HUF 36,600 million due 2030	164	163
HUF bond HUF 35,500 million due 2031	494	494
HRK bond HRK 2,000 million due 2026	102,203	78
Schuldschein €130 million due between 2020-2027	75	98
Bank loans	232,418	233,458
Finance lease liabilities	40,341	51,924
Other	4,578	2,848
<b>Total short-term debt</b>	<b>381,397</b>	<b>290,247</b>
<b>Gross debt (long-term and short-term)</b>	<b>1,035,591</b>	<b>1,253,004</b>
Cash and cash equivalents	360,767	433,610
Current debt securities	168,758	6,711
<b>Net Debt*</b>	<b>506,066</b>	<b>812,683</b>
Total equity	4,562,393	4,659,108
<b>Capital and net debt</b>	<b>5,068,459</b>	<b>5,471,791</b>
<b>Gearing ratio (%)**</b>	<b>10.0%</b>	<b>14.9%</b>
Profit from operation	436,488	584,872
Depreciation, depletion, amortisation and impairment	641,294	506,442
Reported EBITDA from continuing operations	1,077,782	1,091,314
<b>Net Debt/Reported EBITDA</b>	<b>0.47</b>	<b>0.74</b>

\*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:

	31 Dec 2025 HUF million	31 Dec 2024 HUF million
<b>Gross debt by currency</b>		
EUR	729,934	781,472
HUF	197,910	233,837
PLN	65,187	71,283
RON	18,621	21,169
CZK	16,997	16,579
USD	6,920	128,595
Other	22	69
<b>Gross debt</b>	<b>1,035,591</b>	<b>1,253,004</b>

The following issued bonds were outstanding as of 31 December 2025:

	Ccy	Amount Issued (orig ccy, million)	Amount Issued (million HUF)	Coupon	Type	Cpn Freq	Issue date	Maturity	Issuer
Eurobond	EUR	650	250,510	1.5%	Fixed	Annual	08.10.2020	08.10.2027	MOL Plc.
HRK bond	HRK	2,000	102,303	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 265 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 2025		31 Dec 2024	
	Minimum lease payments	Lease liability	Minimum lease payments	Lease liability
	HUF million	HUF million	HUF million	HUF million
<b>Leases as a lessee</b>				
Due within one year	49,894	40,341	61,419	51,924
Due later than one year but not later than five years	148,643	111,866	164,629	157,024
Due later than five years	125,086	87,964	130,293	94,081
<b>Total</b>	<b>323,623</b>	<b>240,171</b>	<b>356,341</b>	<b>303,029</b>
Future finance charges	83,452	n/a	53,312	n/a
<b>Lease liability</b>	<b>240,171</b>	<b>240,171</b>	<b>303,029</b>	<b>303,029</b>

The reconciliation between the Group's total of future minimum lease payments as a lessor and their present value is the following:

	31 Dec 2025		31 Dec 2024	
	Minimum lease payments receivable	Lease receivable	Minimum lease payments receivable	Lease receivable
	HUF million	HUF million	HUF million	HUF million
<b>Finance leases as a lessor</b>				
Due within one year	2,609	2,376	3,672	2,558
Due later than one year but not later than five years	2,874	2,059	5,770	3,332
Due later than five years	3,321	2,458	2,290	1,788
Residual value	-	89	-	1,630
<b>Total</b>	<b>8,804</b>	<b>6,982</b>	<b>11,732</b>	<b>9,308</b>
Future finance income/(expense)	1,822	-	2,424	-
<b>Lease receivable</b>	<b>6,982</b>	<b>6,982</b>	<b>9,308</b>	<b>9,308</b>

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 Nyrt.'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 2025. As of 31 December 2025, 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 2025 and 31 December 2024 is 79,650 HUF million and HUF 79,443 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 Zrt. 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 planned 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. Until 31 December 2024, HUF 78,920 million was used up for several projects. In 2024, an additional 18,000 million transferred from retained earnings to tied-up reserves, the balance of the tied-up reserves was HUF 39,080 million on 31 December 2024. In 2025 the remaining amount was used up.

Changes in the number of ordinary, treasury and authorised 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
<b>Series "A" and "B" shares</b>						
<b>1 Jan 2024</b>	<b>819,424,825</b>	<b>41,158,427</b>	<b>101,753,443</b>	<b>42,977,996</b>	<b>633,534,959</b>	<b>1,059,424,825</b>
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	-	-	-
<b>31 Dec 2024</b>	<b>819,424,825</b>	<b>32,149,630</b>	<b>108,760,021</b>	<b>42,977,996</b>	<b>635,537,178</b>	<b>1,059,424,825</b>
Share distribution for the members of the Board of Directors and participants of MRP	-	(1,661,725)	-	-	1,661,725	-
<b>31 Dec 2025</b>	<b>819,424,825</b>	<b>30,487,905</b>	<b>108,760,021</b>	<b>42,977,996</b>	<b>637,198,903</b>	<b>1,059,424,825</b>
<b>Series "C" shares</b>						
<b>1 Jan 2024</b>	<b>578</b>	<b>578</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>578</b>
<b>31 Dec 2024</b>	<b>578</b>	<b>578</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>578</b>
<b>31 Dec 2025</b>	<b>578</b>	<b>578</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>578</b>

The par value of the treasury shares owned by the Group companies is HUF 22,779 million (31 December 2024: HUF 22,986 million).

#### Dividend

In April 2025 the Board of Directors on behalf of the 2025 Annual General Meeting of MOL Nyrt. approved to pay HUF 220,423 million dividend in respect of 2024, which equals to HUF 275 dividend per share. The total amount of reserves legally available for distribution based on MOL Nyrt.'s reconciliation of equity is HUF 2,537,226 million as of 31 December 2025.

The approved dividend (HUF 220,423 million) and the dividend shown in the statement of changes in equity (HUF 175,229 million) are different because the following movements are not presented as dividend payments: dividend of shares under retransfer agreement (HUF 11,819 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 18,887 million) presented as a decrease in financial liability; dividends of shares in OTP-MOL swap agreement (HUF 11,023 million) presented as change in fair value of derivative instruments, dividend towards MOL Nyrt.'s Employee Share Ownership Programme Organisation (HUF 3,465 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 Nyrt. 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 2025. Under the option agreements, MOL Nyrt. 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	EUR 7.8157	2026.07.03
UniCredit Bank AG	31,000,000	EUR 7.52313	2026.07.03
Commerzbank AG	6,676,013	N/A	2026.07.08

Under the share option agreement executed between ING Bank N.V. ("ING") and MOL on 05 July 2024, 31,000,000 pieces of MOL Series "A" ordinary shares ("Shares") got cash settled on 08 July 2025. MOL and ING entered into a new share option agreement on 27 June 2025 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 7.8157, the expiry is 03 July 2026.

Under the share option agreement executed between UniCredit Bank GmbH and MOL on 05 July 2024, 31,000,000 pieces of MOL Series "A" ordinary shares ("Shares") got cash settled on 08 July 2025. MOL and UniCredit entered into a new share option agreement on 27 June 2025 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 7.52313, the expiry is 03 July 2026.

Under the total return swap agreement executed between MOL and Commerzbank AG (Commerzbank) on 05 July 2024, 6,676,013 pieces of Shares got cash settled on 08 July 2025. MOL and Commerzbank entered into a new total return swap agreement on 27 June 2025 which concerns 6,676,013 pieces of Shares. The agreement's expiry is 08 July 2026.

#### **Share swap agreement with OTP**

MOL Nyrt. 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 had an original expiry on 11 July 2012 and was further extended in 2022 until 11 July 2027, which did not trigger any movement in MOL Nyrt.'s treasury shares. Until the expiration date each party can initiate a cash or physical (i.e. in shares) settlement of the deal.

## 21. Financial instruments

31 Dec 2025		Fair value through profit or loss	Derivatives used for hedging	Amortised cost	Fair value through other comprehensive income	Total carrying amount
Carrying amount of financial instruments		HUF million	hedge acc.* HUF million	HUF million	HUF million	HUF million
<b>Financial assets</b>						
Other non-current financial assets	Equity instruments	18,782	-	-	178,963	197,745
	Loans given	-	-	6,438	-	6,438
	Deposit	-	-	2,365	-	2,365
	Finance lease receivables	-	-	4,606	-	4,606
	Debt securities	-	-	-	66,848	66,848
	Commodity derivatives	2,366	-	-	-	2,366
	Other derivatives	-	-	-	-	-
	Other	1,249	-	29,958	-	31,207
<b>Total non-current financial assets</b>		<b>22,397</b>	<b>-</b>	<b>43,367</b>	<b>245,811</b>	<b>311,575</b>
Trade and other receivables		-	-	894,131	-	894,131
Cash and cash equivalents		-	-	360,767	-	360,767
Debt securities		-	-	-	168,758	168,758
Other current financial assets	Commodity derivatives	21,328	-	-	-	21,328
	Loans given	-	-	910	-	910
	Deposit	-	-	10	-	10
	Finance lease receivables	-	-	216	-	216
	Other derivatives	-	-	-	-	-
	Other	-	-	14,800	-	14,800
<b>Total current financial assets</b>		<b>21,328</b>	<b>-</b>	<b>1,270,834</b>	<b>168,758</b>	<b>1,460,920</b>
<b>Total financial assets</b>		<b>43,725</b>	<b>-</b>	<b>1,314,201</b>	<b>414,569</b>	<b>1,772,495</b>
<b>Financial liabilities</b>						
Borrowings (long-term debt)		-	-	454,364	-	454,364
Finance lease liabilities		-	-	199,830	-	199,830
Other non-current financial liabilities	Commodity derivatives	2,155	-	-	-	2,155
	Other derivatives	-	-	-	-	-
	Other	-	-	23,923	-	23,923
	Interest rate derivatives	-	-	-	-	-
<b>Total non-current financial liabilities</b>		<b>2,155</b>	<b>-</b>	<b>678,117</b>	<b>-</b>	<b>680,272</b>
Trade and other payables		263	-	805,236	-	805,499
Borrowings (short-term debt)		-	-	341,056	-	341,056
Finance lease liabilities		-	-	40,341	-	40,341
Other current financial liabilities	Transferred "A" shares with put&call options**	-	-	180,398	-	180,398
	Transferred "A" shares with Total Return Swap**	-	-	19,733	-	19,733
	Commodity derivatives	22,440	-	-	-	22,440
	Foreign exchange derivatives	6	-	-	-	6
	Other derivatives	7,944	-	-	-	7,944
	Other	-	-	28,620	-	28,620
<b>Total current financial liabilities</b>		<b>30,653</b>	<b>-</b>	<b>1,415,384</b>	<b>-</b>	<b>1,446,037</b>
<b>Total financial liabilities</b>		<b>32,808</b>	<b>-</b>	<b>2,093,501</b>	<b>-</b>	<b>2,126,309</b>

\*hedge acc: under hedge accounting

\*\*more information about the transferred "A" shares with put&call options and Total Return Swap is included in Note 20/c

31 Dec 2024		Fair value through profit or loss	Derivatives used for hedging	Amortised cost	Fair value through other comprehensive income	Total carrying amount
Carrying amount of financial instruments		HUF million	hedge acc.*	HUF million	HUF million	HUF million
<b>Financial assets</b>						
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
<b>Total non-current financial assets</b>		<b>24,987</b>	<b>-</b>	<b>52,641</b>	<b>212,025</b>	<b>289,653</b>
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
<b>Total current financial assets</b>		<b>18,579</b>	<b>-</b>	<b>1,440,204</b>	<b>6,711</b>	<b>1,465,494</b>
<b>Total financial assets</b>		<b>43,566</b>	<b>-</b>	<b>1,492,845</b>	<b>218,736</b>	<b>1,755,147</b>
<b>Financial liabilities</b>						
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
<b>Total non-current financial liabilities</b>		<b>3,744</b>	<b>459</b>	<b>965,730</b>	<b>-</b>	<b>969,933</b>
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
<b>Total current financial liabilities</b>		<b>14,750</b>	<b>-</b>	<b>1,416,447</b>	<b>-</b>	<b>1,431,197</b>
<b>Total financial liabilities</b>		<b>18,494</b>	<b>459</b>	<b>2,382,177</b>	<b>-</b>	<b>2,401,130</b>

\*hedge acc: under hedge accounting

\*\*more information about the transferred "A" shares with put&call options and Total Return Swap 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.

The most significant equity instruments are JANAF interest held by INA d.d., the company that owns and operates the Adria pipeline system, and 15.00% ownership interest held in Waberer's International Nyrt. The market value of JANAF shares as of 31 December 2025 amounted to HUF 35,661 million (31 December 2024: HUF 40,212 million), while the market value of Waberer's International Nyrt. shares amounted to HUF 13,960 million as of 31 December 2025 (31 December 2024: HUF 10,590 million). The Group also acquired a 0.4% minority interest in MBH Bank Nyrt. in secondary public offering in December 2025. The shares are not held for trading, so the Group elected upon initial recognition to measure the investment at fair value through other comprehensive income. The market value of the shares amounted to HUF 4,096 million as of 31 December 2025. Fair value of these shares are 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 and MNB 1 week discount bills held as part of the Group's liquidity management strategy. 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 Group determines fair value of contingent considerations based on the present value of estimated future cash flows using observable market prices.

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 442,733 million, while their carrying amount is HUF 473,262 million as of 31 December 2025 (31 December 2024: fair value was HUF 449,175 million, carrying amount was HUF 494,972 million). HUF 245,498 million of the fair value of the issued bonds is categorised as Level 1 and HUF 197,235 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			2025 HUF million	2024 HUF million
Net investment hedge	Liabilities	Borrowings	288,632	451,451
Cash flow hedge	Liabilities	Interest rate derivatives	-	459

#### 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 731 million, no USD denominated loans were included at year-end (31 December 2024: EUR 1,110 million). The weighted average hedged rates, where the weight is the balance of the hedging instrument, for the year are 401.23 HUF/EUR (31 December 2024: 395.4 HUF/EUR)

The movements of the currency translation reserve due to net investment hedging are the following:

Net investment in foreign operation		Notes	2025 HUF million	2024 HUF million
Opening Balance of the foreign currency translation reserve due to hedging, net of tax			186,119	166,562
Change in value of hedged item used to determine hedge effectiveness			(18,350)	25,412
Change in carrying amount of borrowings as a result of foreign currency movements recognised in other comprehensive income		8	18,350	(25,412)
Change in foreign currency translation reserve due to hedging, net of tax		8	(13,324)	19,557
Closing Balance of the foreign currency translation reserve due to hedging, net of tax			172,795	186,119

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.

## 22. Fair value measurement of financial instruments

Fair value hierarchy	31 Dec 2025				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	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
<b>Financial assets</b>								
Equity instruments	53,786	143,959	-	197,745	50,801	109,450	-	160,251
Debt securities	-	235,606	-	235,606	-	77,973	-	77,974
Commodity derivatives	-	23,694	-	23,694	-	16,618	-	16,617
Other derivatives	-	-	-	-	-	5,181	-	5,181
Other	-	-	1,249	1,249	-	-	2,278	2,278
<b>Total financial assets</b>	<b>53,786</b>	<b>403,259</b>	<b>1,249</b>	<b>458,294</b>	<b>50,801</b>	<b>209,222</b>	<b>2,279</b>	<b>262,302</b>
<b>Financial liabilities</b>								
Commodity derivatives	-	24,595	-	24,595	-	15,669	-	15,669
Foreign exchange derivatives	-	6	-	6	-	-	-	-
Other derivatives	-	7,944	-	7,944	-	2,825	-	2,825
Interest rate derivatives	-	-	-	-	-	459	-	459
Other	-	263	-	263	-	-	-	-
<b>Total financial liabilities</b>	<b>-</b>	<b>32,808</b>	<b>-</b>	<b>32,808</b>	<b>-</b>	<b>18,953</b>	<b>-</b>	<b>18,953</b>

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 notice from WPL, the counterparty to MOL in the 2022 sale of MOL's entire UK E&P portfolio, that it entered administration 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. As of 31 December 2025, the Group has no longer any right related to the Angolan Block 3/05 earn-out consideration. The fair value of the Angolan Block 3/05A earn-out consideration is dependent on the start date of the production.

The following table shows the changes in the value of level 3 financial assets for the period ended at 31 December 2025:

	2025 HUF million	2024 HUF million
<b>Opening Balance</b>	<b>2,279</b>	<b>24,716</b>
Increase	-	-
Decrease	-	-
Gains/losses arising during the year	(1,029)	2,580
Write-off	-	(25,017)
<b>Closing Balance</b>	<b>1,249</b>	<b>2,279</b>



## 23. 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.

	31 Dec 2025 HUF million	31 Dec 2024 HUF million
<b>Trade and other receivables</b>		
Trade receivables	729,168	788,908
Other receivables	164,963	165,002
<b>Total</b>	<b>894,131</b>	<b>953,910</b>

	31 Dec 2025 HUF million	31 Dec 2024 HUF million
<b>Trade receivables</b>		
Trade receivables (gross)	749,532	803,986
Loss allowance for receivables	(20,364)	(15,078)
<b>Total</b>	<b>729,168</b>	<b>788,908</b>

The gross amount of trade receivables decreased mainly due to lower product prices in Downstream segment. The reason for the increase in impairment is that the MOHU Zrt. has recognised a loss allowance for overdue receivables.

	2025 HUF million	2024 HUF million
<b>Movements in the loss allowance for receivables</b>		
<b>At 1 January</b>	<b>15,078</b>	<b>9,792</b>
Additions	9,910	8,477
Reversal	(2,323)	(3,004)
Amounts written off	(1,707)	(724)
Foreign exchange differences	(594)	537
<b>At 31 December</b>	<b>20,364</b>	<b>15,078</b>

	31 Dec 2025		31 Dec 2024	
	Gross book value HUF million	Net book value HUF million	Gross book value HUF million	Net book value HUF million
<b>Ageing analysis of trade receivables</b>				
<b>Not past due</b>	<b>663,628</b>	<b>661,022</b>	<b>717,291</b>	<b>714,860</b>
<b>Past due</b>	<b>85,904</b>	<b>68,146</b>	<b>86,695</b>	<b>74,048</b>
Within 180 days	56,342	55,008	63,781	62,626
Over 180 days	29,562	13,138	22,914	11,422
<b>Total</b>	<b>749,532</b>	<b>729,168</b>	<b>803,986</b>	<b>788,908</b>

### Current assets pledged as security

The carrying amount of current assets pledged as security for liabilities is HUF 10,414 million as of 31 December 2025 (2024: HUF 6,186 million).

## 24. 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 2025 HUF million	31 Dec 2024 HUF million
Short-term bank deposits	197,188	192,514
Demand deposit	143,131	221,712
Cash on hand	20,448	19,384
<b>Total</b>	<b>360,767</b>	<b>433,610</b>

### Cash and cash equivalents pledged as security

The carrying amount of cash and cash equivalents pledged as security for liabilities is HUF 12,799 million as of 31 December 2025 (2024: HUF 12,785 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.

### 25. 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 amount of bank guarantees, letters of credit and other guarantees undertaken for parties outside the MOL Group and for equity accounted investments totals HUF 287,270 million (31 December 2024: HUF 349,357 million).

#### b) Capital and Contractual Commitments

The total amount of capital and contractual commitments of the fully consolidated companies as of 31 December 2025 is HUF 255,794 million (31 December 2024: HUF 270,061 million). Of this amount, HUF 102,638 million relates to operations in Hungary, HUF 64,552 million to operations in Croatia and HUF 28,312 million to operations in Slovakia.

In the Upstream segment, the MOL Group's most significant commitments relate to the drilling and completion of new wells, de-risking wells through a 4D seismic programme, and the execution of the annual work programme (HUF 60,292 million).

In Hungary, MOL has undertaken material commitments in the area of waste management (HUF 28,815 million). The hazardous waste incineration project aims to provide the Danube Refinery with a reliable and efficient incineration facility that meets all applicable regulatory requirements for the coming decades. MOL also has further investment commitments in Hungary related to the revamp of the olefin unit (HUF 11,726 million), the implementation of the metathesis project at the Tiszaújváros petrochemical complex (HUF 11,318 million), and the capacity expansion of the maleic anhydride plant at the Danube Refinery (HUF 10,509 million).

In Croatia, MOL is committed to the transformation of the refining business and to enhancing the competitiveness of the Rijeka Refinery (HUF 19,291 million). The investment will make the refinery one of the most modern facilities in Europe and will increase the share of profitable "white products" (motor fuels), thereby better serving market needs. Other significant commitments in Croatia include the Hydrogen Project, which aims to develop production capacity and the necessary infrastructure with potential future expansion as hydrogen demand in the mobility sector grows (HUF 9,814 million), as well as the Irena gas field development project in the Adriatic Sea (HUF 8,097 million).

In Slovakia, the Group has a commitment of HUF 7,636 million related to a decarbonization by electrification investment project aimed at improving energy efficiency and supporting the transition to low-carbon operations at the Slovnaft Bratislava refinery.

#### c) Unrecognised lease commitments

	31 Dec 2025	31 Dec 2024
	HUF million	HUF million
Unrecognised lease commitments*		
Due within one year	2,577	2,340
Due later than one year but not later than five years	5,984	927
<b>Total</b>	<b>8,561</b>	<b>3,267</b>

\*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 19,178 million for which HUF 3,977 million provision has been made.

##### ICSID arbitration (MOL Nyrt. v. Croatia)

The International Centre for Settlement of Investment Disputes (ICSID) delivered its verdict in the arbitration case between the Republic of Croatia and MOL Nyrt. 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 (Belvedere d.d. v. INA d.d, 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.

The court has adopted a decision on continuing the subject proceeding. The plaintiff filed an appeal against the aforementioned decision.

#### **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 (No 018-11/23), the first instance court rejected the claim. The plaintiff filed an appeal against the subject decision. The case regarding the Real Estate Sales Contract (No 018-14/23) is ongoing before the first instance court.

#### **RSG (RSG Europe Service Centre Limited v. INA d.d.)**

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.

On 21.03.2025 the first instance court adopted a decision by which it rejected the claim of the plaintiff. The plaintiff appealed on 04.04.2025 and INA responded to the appeal on 25.04.2025.

#### **ICC Arbitration (OMV v. MOL Slovenia Downstream Investments B.V.)**

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.

#### **Employment-related lawsuits (Muamer V. et al. v. ENERGOPETROL, No. 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 ENERGOPETROL. In September 2025, the second-instance court rendered a judgment dismissing the plaintiffs' claim, thereby upholding the decision in favour of ENERGOPETROL. However, it is anticipated that the plaintiffs will file a request for revision before the Supreme 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 EUR 9.4 million as principal, EUR 7.4 million in taxes and contributions, and statutory default interest accrued as of 2025 at EUR 4.9 million (10% per annum on the principal).

**Termination of the association agreement (Bucharest Municipality v. MOL Romania)**

Bucharest Municipality requested for judicial termination of the association agreement between MOL Romania and BM, plus damages, penalties and surrender of investments. The total negative impact, in case MOL Romania would lose the litigation is formed of the total lost EBITDA for the 8 service stations in Bucharest that are the object of the association contract with Bucharest Municipality would be estimated to USD 39 million. On 15 May 2023 term – PMB requested and MOL Romania agreed with a term for parties to reach an agreement, a settlement. Since then, the trial was postponed several times. MOL Romania is trying to reach an amicable settlement. MOL Romania had several meetings and exchange of proposals in order to reach an agreement. Latest letter submitted to BM was on 14 July 2025. The last hearing was postponed due to the magistrates/judges strike. Next hearing yet unknown.

**e) Environmental liabilities**

The Group is exposed to obligations arising from environmental damage or pollution and the related remediation activities. The Group is also responsible for addressing historical environmental contamination associated with its past operations. Accordingly, as at 31 December 2025, the Group recognised a provision of HUF 69,855 million for the estimated costs of restoring historical environmental damage and for actions required to comply with current environmental regulations. In addition, a provision of HUF 5,322 million has been recorded for an anticipated estimates of the obligations, future regulatory developments or changes, as well as differences between known and actual environmental conditions, may require revisions to these estimates (see Note 16).

At certain Group sites, the cost of remediation cannot currently be measured reliably, or legal requirements do not clearly define the actions to be taken. The most significant case relates to the Tiszaújváros site, where the Group has identified potentially material soil and groundwater contamination. In line with the resolution issued by the regional environmental authority, the Group conducted contamination assessments at MOL Petrolkémia Zrt. and the MOL Tisza Refinery, submitting the results and the related technical implementation plans to the authority in July 2021. Based on these submissions, the authority issued a resolution on 7 September 2021, requiring MOL Petrochemicals Zrt. and the Group to jointly implement the environmental risk management plan. Provisions have been recognised by both entities for their respective obligations under this plan. The amount of obligations related to unforeseen remediation activities cannot currently be quantified, but is not expected to exceed HUF 4,000 million.

Furthermore, the technology applied in oil and gas exploration and production prior to 1995 by the Group's Hungarian predecessor may give rise to future remediation obligations related to drilling mud generated during these operations (the drilling technology was updated in 1995). Under applicable regulations, the removal and disposal of such pollutants is required. The potential costs associated with this obligation depend on the scale, volume and composition of drilling mud present at the various production sites. Based on current estimates, the related environmental liability amounts to HUF 1,114 million.

Additional contingent liabilities may arise from future detailed site investigations or from potential changes in national legislation or regulatory practices, particularly in relation to the industrial park surrounding the Mantova refinery, which was acquired in previous business combinations. As at 31 December 2025, a provision of HUF 19,469 million has been recognised for potential obligations related to these environmental risks (31 December 2024: HUF 20,717 million).

## 26. 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.

	2025	2024
	HUF million	HUF million
<b>Analysis of net cash outflow on acquisition of subsidiaries, joint operations as business combinations</b>		
Cash consideration	(11,561)	(36,596)
Cash at bank or on hand acquired	670	35,772
<b>Net cash outflow on acquisition of subsidiaries, joint operations</b>	<b>(10,891)</b>	<b>(824)</b>

	2025	2024
	HUF million	HUF million
<b>Analysis of net cash flow related to sale of subsidiaries, joint operations as business combinations</b>		
Cash consideration	17,492	398
Cash at bank or on hand disposed	(520)	(130)
<b>Net cash inflow/(outflow) related to sale of subsidiaries, joint operations</b>	<b>16,972</b>	<b>268</b>

	2025	2024
	HUF million	HUF million
<b>Analysis of increase/decrease in other financial assets</b>		
Prepayments for business combination	(351)	-
Change of escrow account of decommissioning	-	2,435
Bought/sold bonds	(161,754)	(9,260)
Net change of given loans	22,083	11,766
Other changes	(2,267)	(9,402)
<b>Total change in other financial assets</b>	<b>(142,289)</b>	<b>(4,461)</b>

	2025	2024
	HUF million	HUF million
<b>Analysis of cash flow related to joint ventures and associates</b>		
Cash consideration of acquisition and capital increase	(2,594)	(1,360)
Dividend from joint ventures and associates	13,783	19,272
Net movements of loans	37,887	(365)
<b>Total</b>	<b>49,076</b>	<b>17,547</b>

	2025	2024
	HUF million	HUF million
<b>Analysis of other items</b>		
Fair value change - commodity	(6,124)	12,335
Gain/Loss on receivables sold	4,122	1,475
Write-off of inventories, net	22,414	17,917
Write-off of receivables, net	9,304	58,253
Other non-highlighted items	742	(1,240)
<b>Total</b>	<b>30,458</b>	<b>88,740</b>

	01 Jan 2025 balance	Non-cash changes							31 Dec 2025 balance
		Cash flows used in financing activities	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	962,758	(317,975)	(12)	(97,669)	-	32,931	74,161	-	654,194
Other non-current financial liabilities	7,175	(2,951)	-	(333)	-	-	-	22,187	26,078
Short-term debt	290,246	187,102	-	(107,862)	-	12,330	-	(419)	381,397
Other current financial liabilities	239,574	14,208	-	(9,289)	(5,420)	-	-	20,068	259,141
Total Cash flows used in financing activities from financial liabilities	-	(119,616)	-	-	-	-	-	-	-
Other items impacting Cash flows used in financing activities	-	(215,093)	-	-	-	-	-	-	-
Total Cash flows used in financing activities	-	(334,709)	-	-	-	-	-	-	-

The Other items impacting Cash flows used in financing activities, HUF 239,691 million is the paid dividend to shareholders from retained earnings.

## 27. 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	Weighted average number of shares	Earnings/(Loss) per share
	HUF million		HUF
Basic Earnings Per Share cont.op. 2024	368,158	741,964,078	496.19
Diluted Earnings Per Share cont.op. 2024	368,158	741,964,078	496.19
Basic earnings per share attributable to owners of the parent (HUF) discount.op. 2024	(40,893)	741,964,078	(55)
Diluted earnings per share attributable to owners of the parent (HUF) discount.op. 2024	(40,893)	741,964,078	(55)
Basic Earnings Per Share 2024	327,265	741,964,078	441.08
Diluted Earnings Per Share 2024	327,265	741,964,078	441.08
Basic Earnings Per Share cont.op. 2025	298,053	748,672,179	398
Diluted Earnings Per Share cont.op. 2025	298,053	748,672,179	398
Basic earnings per share attributable to owners of the parent (HUF) discount.op. 2025	-	748,672,179	0.00
Diluted earnings per share attributable to owners of the parent (HUF) discount.op. 2025	-	748,672,179	0.00
Basic Earnings Per Share 2025	298,053	748,672,179	398.08
Diluted Earnings Per Share 2025	298,053	748,672,179	398.08

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 2024 and 2025.



## 28. Related party transactions

### a) Transactions with associated companies and joint ventures

	2025	2024
	HUF million	HUF million
Trade and other receivables due from related parties	3,825	6,320
Long-term loans given to related parties	6,136	7,316
Long-term receivables from related parties due to finance lease	-	5,201
Short-term loans given to related parties	-	38,058
Short-term receivables from related parties due to finance lease	-	696
Trade and other payables due to related parties	21,504	25,568
Long-term liabilities to related parties due to finance lease	1,812	2,463
Short-term liabilities to related parties due to finance lease	503	661
Net sales to related parties	29,802	38,494
Other expenses from impairment of receivables due from related parties	-	-
Finance expenses from impairment of receivables due from related parties	-	3,241

The Group purchased and sold goods and services with associated companies and joint ventures during the ordinary course of business in 2025 and 2024. 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 162 million in 2025 (2024: HUF 153 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

	2025	2024
	number of shares	number of shares
Board of Directors	6,402,601	6,050,637
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)	169,531	166,142
<b>Total</b>	<b>6,822,132</b>	<b>6,466,779</b>

### d) Transactions with Management, officers and other related parties

In 2025 entities controlled by the members of key management personnel purchased fuel and other retail services from MOL Group in the total value of HUF 4,298 million (2024: HUF 5,009 million). MOL Group provided subsidies through sponsorship for sport organisations controlled by key management personnel in the total value of HUF 422 million (2024: HUF 459 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 4,182 million (2024: HUF 3,711 million). All of the transactions were conducted under market prices and conditions.

Entities controlled by key management personnel hold 4,197,378 shares (2024: 4,112,378 shares).

### e) Key management compensation

The amounts disclosed contain the compensation of managers who qualify as a key management member of MOL Group.

	2025 HUF million	2024 HUF million
Salaries and wages	1,298	1,197
Other short-term benefits	1,275	518
Share-based payments	613	977
<b>Total</b>	<b>3,186</b>	<b>2,692</b>

### f) Loans to the members of the Board of Directors and Supervisory Board

No loans have been granted to key management personnel.

## 29. Events after the reporting period

### a) MOL signed Heads of Agreement to acquire majority ownership of Serbian NIS

On 19 January 2026 MOL Group has signed a binding Heads of Agreement with Gazprom Neft to acquire its 56.15% stake in the Serbian Naftna Industrija Srbije (NIS) corporation. Once the transaction is completed, MOL will assume significant shareholder responsibilities and control rights in the company operating Serbia's only refinery, this way further strengthening its presence in the Central and Southeastern European energy market. Besides the oil refinery in Pancevo NIS also has a retail network and holds an exploration and production portfolio. The parties aim to sign the sales and purchase agreement by 31 March 2026 subject to regulatory approvals.

### b) MOL Group and Libya's Strategic partnership

On 30 January 2026 MOL Group has entered into a new strategic partnership with Libya's National Oil Corporation (NOC). The memorandum of understanding sets the foundation for cooperation in hydrocarbons exploration, technological innovation and crude trading. The strategic partnership agreement sets out the framework for NOC and MOL to exchange information and jointly explore potential areas of cooperation. These include hydrocarbon exploration and production, technological and field development innovations, oilfield services opportunities in Libya, crude supply and trading activities. As part of MOL Group's international portfolio, the company has oil and gas exploration and production assets in nine countries, with production in eight countries: in Croatia, Azerbaijan, Iraq, Kazakhstan, Russia, Pakistan, Egypt, and Hungary. To maintain the updated SHAPE TOMORROW strategy target of at least 90 thousand barrels of oil equivalent/day production level over the next 5 years, MOL aims to further strengthen its international portfolio and seeks additional strategic partnerships.

### c) MOL Group to enter Libya in joint venture with Repsol and Türkiye Petrolleri A.O.

MOL Group further expands its international portfolio by entering Libya through a successful joint bidding with Repsol and Türkiye Petrolleri A. O. (TPAO) for an offshore exploration area in the Mediterranean Sea. In the joint venture, Repsol will be the operator of the project with 40% share, TPAO also holds 40% and MOL Group enters the project with a 20% share.

In March 2025, Libya's National Oil Corporation (NOC) reopened its first licensing round in 17 years, offering 22 exploration areas. Together with Repsol (40%, operator) and TPAO (40%), MOL Group (20%) has submitted a joint bid for the O7 offshore block and won the right to conduct hydrocarbon exploration. The O7 block covers more than 10,300 km<sup>2</sup> in water depths exceeding 1,500 meters, located approximately 140 kilometers northwest of Benghazi. Its deepwater setting aligns with the consortium's extensive offshore experience.

### d) MOL initiates the release of strategic crude oil reserves to maintain security of supply in the region

No crude oil has been delivered to Hungary and Slovakia via the Druzhba pipeline since 27 January 2026. To make up for the shortfall, MOL has started supplying its refineries with seaborne crude oil, and initiated the release of strategic oil reserves in both countries until the shipments arrived. The current situation does not threaten fuel supplies: the market is being served without disruption, and MOL continues to operate within the framework of normal business and the company is continuously monitoring developments.

**e) Windfall tax on energy suppliers**

Under the Government Decree of 3 February 2026, in addition to the tax liability as provided for by the District Heating Act (Act LXVII of 2008), an entity qualifies as a taxpayer of the Income Tax of Energy Suppliers as of 1 January 2026 incurs a tax obligation for the 2026 tax year. The tax base is 0.5% of the revenue reported in the 2024 annual financial statements from activities subject to Income Tax under the Income Tax of Energy Suppliers, but not exceeding 50% of the 2024 income tax base.

**f) Geopolitical events in the Middle East**

At the end of February 2026, an escalation of geopolitical tensions occurred in the Middle East, which may affect the volatility of the global energy market. Management is monitoring developments and assessing the potential effects on the operations of MOL Plc. and MOL Group.

**g) Regulatory measures related to fuel prices in Central and Eastern Europe (CEE)**

In March 2026, Hungarian and Croatian governments adopted regulatory measures concerning the determination of the maximum retail prices of petroleum products. In Serbia export limitations were introduced on petroleum products and crude oil. These measures were introduced in response to the increase in global oil prices and with the aim of mitigating the impact on citizens. The regulations establish maximum retail prices or margins that may be applied to petroleum products by energy companies engaged in the wholesale and/or retail trade of petroleum products within the respective jurisdictions.

These events represent events after the reporting date that do not require adjustment of amounts recognised in the financial statements. Based on the information currently available, Management believes that there is no need to revise the estimates and assumptions used in the preparation of the financial statements and that the above measures do not affect the Company's and the Group's ability to continue as a going concern.

## 30. 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:
  - Amendments to IFRS 9 and IFRS 7 *Classification and Measurement of Financial Instruments* (issued on 30 May 2024, effective from 1 January 2026);
  - Annual Improvements to IFRS Accounting Standards - *Volume 11* (issued on 18 July 2024, effective from 1 January 2026);
  - Amendments to IFRS 9 and IFRS 7 *Contracts Referencing Nature-dependent Electricity* (issued on 18 December 2024, effective from 1 January 2026).
  - IFRS 18 *Presentation and Disclosure in Financial Statements* (issued on 9 April 2024, effective from 1 January 2027);
- ▶ Standards and Interpretations issued by IASB but not yet adopted by the EU:
  - IFRS 19 *Subsidiaries Without Public Accountability: Disclosures* (issued on 9 of May 2024, effective from 1 of January 2027);
  - Amendments to IFRS 19 *Subsidiaries without Public Accountability: Disclosures* (issued on 21 August 2025, effective from 1 January 2027);
  - Amendments to IAS 21 *The Effects of Changes in Foreign Exchange Rates: Translation to a Hyperinflationary Presentation Currency* (issued on 13 November 2025, effective from 1 January 2027).

The above-mentioned standards and amendments are not expected to have a significant impact on the Group's consolidated results, financial position, or financial statements, except for IFRS18 "Presentation and Disclosure in Financial Statements". Under IFRS18, the MOL Group's income statement will be disaggregated into operating, investing, and financing activities, and the standard also contains more detailed requirements regarding key performance measures, including the EBITDA and Clean CCS EBITDA metrics used by MOL. Based on IFRS18, certain items are expected to be reclassified between the individual income statement categories, which may result in changes compared to the current presentation practice and may also affect the currently presented MPM indicators, including the Clean CCS EBITDA metric. The MOL Group is currently assessing the potential impacts on the Group's consolidated income statement from 1 January 2027, as well as on the related comparative information.

**b) Appendix II.: Subsidiaries**

Company name	Country (Incorporation/Branch)	Range of activity	Ownership	
			2025	2024
Integrated subsidiaries				
INA-Industrija nafte d.d.	Croatia	Integrated oil and gas company	49%	49%
Upstream				
Adriagas S.r.l.	Italy	Pipeline project company	49%	49%
Csanád Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
EMSZ Első Magyar Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
Endrőd Gázipari Kft. <sup>2</sup>	Hungary	Exploration and production activity	100%	-
Kalegran B.V.	Netherlands	Exploration financing	100%	100%
Kalegran B.V Erbil Branch Office	Iraq	Exploration and production activity	100%	100%
KMSZ Koncessziós Kft.	Hungary	Exploration and production activity	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 Kft.	Hungary	Exploration and production activity	100%	100%
MOL Dráva Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	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 Kiskőrös Szénhidrogén Koncessziós Kft. <sup>2</sup>	Hungary	Exploration and production activity	100%	-
MOL Nyírség-Dél Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
MOL Nyírség-Észak Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
MOL Okány-Nyugat Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
MOL Őrség Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
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 activity	100%	100%
MOL RBS Holding Kft.	Hungary	Exploration financing	100%	100%
MOL RBS Operator Kft.	Hungary	Exploration financing	60%	60%
MOL RBS S.r.l.	Romania	Exploration and production activity	60%	60%
MOL-RUSS Ooo.	Russia	Management services	100%	100%
MOL Somogyvámos Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
MOL SZMDK Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
MOL Uranus Ltd. <sup>2</sup>	Cyprus	Investment management	100%	-
MOL Azerbaijan Ltd.	Bermuda	Exploration and production activity	100%	100%
MOL Crossroads B.V.	Netherlands	Exploration financing	100%	100%
MOL E&P Cyprus Ltd. <sup>2</sup>	Cyprus	Exploration financing	100%	-
MOL Vector Ltd. <sup>2</sup>	Cyprus	Exploration financing	100%	-
MOL Zala-Nyugat Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
Panfora Oil and Gas S.r.l.	Romania	Exploration and production activity	100%	100%
Tápló Szénhidrogén Koncessziós Kft.	Hungary	Exploration and production activity	100%	100%
Gas-Midstream				
FGSZ Földgázszállító Zrt.	Hungary	Natural gas transmission	100%	100%
CEEGEX Közép-Kelet-Európai Szervezett Földgázpiac Zrt. <sup>2</sup>	Hungary	Gas trading	75%	-
Circular Economy				
Greenpet Recycle Kft.	Hungary	Waste Management	100%	100%
MOHU Budapest Zrt.	Hungary	Waste Management	50%	50%
MOHU Holding Kft.	Hungary	Investment management	100%	100%
NHSZ Észak-KOM Nonprofit Kft. <sup>3</sup>	Hungary	Waste Management	-	94%
NHSZ Gyöngyösi Reg. Hulladékekezelő Kft.	Hungary	Waste Management	98%	98%
NHSZ Mátra Hulladékekezelő Nonprofit Kft. <sup>3</sup>	Hungary	Waste Management	-	99%
MOHU Miskolc Kft. (former:NHSZ Miskolc Kft.)	Hungary	Waste Management	100%	100%
NHSZ Tatabánya Zrt.	Hungary	Waste Management	67%	67%
NHSZ Vértess Vidéke HG Nonprofit Kft.	Hungary	Waste Management	65%	65%
NHSZ Tapolca Nonprofit Kft. <sup>4</sup>	Hungary	Waste Management	-	96%
NHSZ Csobánc Kft. <sup>4</sup>	Hungary	Waste Management	-	96%
NHSZ TISZA Nonprofit Kft.	Hungary	Waste Management	77%	77%
MOHU MOL Hulladékgazdálkodási Zrt.	Hungary	Waste Management	100%	100%
MOL Körforgásos Gazdálkodás Kft.	Hungary	Waste Management	100%	100%
RE-POL Innovációs Termelő és Ker. Kft.	Hungary	Rubber waste handling, recycling	56%	56%
Vivienvíz Kft.	Hungary	Mineral water production and distribution	100%	100%
Downstream				
Aufwind Schmack Első Biogáz Kft.	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 products	100%	100%
Panta Distribuzione S.r.l.	Italy	Trading of oil products	100%	100%
INA d.o.o. Beograd	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 trading	49%	49%
Leodium Investment Kft.	Hungary	Financial services	100%	100%
MOL Austria GmbH	Austria	Wholesale trade of lubricants and oil products	100%	100%
Roth Energie GmbH	Austria	Trading of oil products	100%	100%
MOL Commodity Trading Kft.	Hungary	Financial services	100%	100%
MOL Dionysus Ltd. <sup>2</sup>	Cyprus	Investment management	100%	-
MOL CZ Investment Cyprus Ltd. <sup>2</sup>	Cyprus	Investment management	100%	-
MOL Germany GmbH	Germany	Trading of oil products	100%	100%
Aurora Kunststoffe GmbH	Germany	Plastic compounding	100%	100%
MOL Kunststoff Kft.	Hungary	Investment management	100%	100%
MOL-LUB Kft.	Hungary	Production and trade of lubricants	100%	100%
MOL LPG Europe Kft. <sup>2</sup>	Hungary	Investment management	100%	-
MOL Petrolkémia Zrt.	Hungary	Petrochemical production and trading	100%	100%
Tisza-WTP Kft. <sup>1</sup>	Hungary	Feed water and raw water supply	0%	0%
TVK-Erőmű Kft.	Hungary	Electricity production and distribution	100%	100%
MOL REMA Holding Kft.	Hungary	Investment management	100%	100%
Recrea Asset Management Zrt.	Hungary	Business management	100%	100%
ReMat Hulladékhazsnosító Zrt.	Hungary	Recycling and wholesale of waste	100%	100%
Moltrans Kft.	Hungary	Transportation services	100%	100%
MOLTRADE-Mineralimpex Zrt.	Hungary	Importing and exporting of energetical products	100%	100%
MOL Ukraine LLC	Ukraine	Wholesale and retail trade	100%	100%
OLAJTERV Tervező Zrt.	Hungary	Engineering activity	100%	100%

Company name	Country (Incorporation/Branch)	Range of activity	Ownership	
			2025	2024
SLOVNAFT a.s.	Slovakia	Refinery and marketing of oil and petrochemical products	100%	100%
Dalby a.s.	Slovakia	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 Zrt.	Hungary	Oil product storage	74%	74%
Zváz pre skladovanie zásob a.s.	Slovakia	Wholesale and retail trade, warehousing	100%	100%
<b>Consumer Services</b>				
Energopetrol d.d.	Bosnia and Herzegovina	Retail trade	44%	44%
Fresh Corner Restaurants Holding Kft.	Hungary	Investment management	100%	100%
Fresh Corner Restaurants Kft.	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 and foreign market	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 CZ Downstream Investment B.V. <sup>3</sup>	Netherlands	Investment management	-	100%
MOL Fleet Holding Kft.	Hungary	Investment management	100%	100%
MOL Mercarius Holding Kft.	Hungary	Investment management	34%	34%
MOL Fleet Solution Flottakezelő Kft.	Hungary	Fleet management	34%	100%
Mercarius Flottakezelő Kft.	Hungary	Fleet management	34%	34%
Mercarius Kft.	Hungary	Fleet management	34%	34%
MOL & INA d.o.o.	Slovenia	Trading of oil products	100%	100%
MOL Limitless Mobility Holding Kft.	Hungary	Investment management	100%	100%
MOL Limitless Mobility Kft.	Hungary	Car sharing	100%	100%
MOL Polska sp. z o.o.	Poland	Retail sale of fuel for motor vehicles at service stations	100%	100%
Slovnaft Polska S.A. <sup>5</sup>	Poland	Wholesale and retail trade	-	100%
MOL Retail Holding Kft.	Hungary	Real estate management	100%	100%
MOL Kiskereskedelmi Ingatlan Kft.	Hungary	Real estate management	100%	100%
MOL Rhea Ltd. <sup>2</sup>	Cyprus	Investment management	100%	-
MOL Slovenia Investment Cyprus Ltd. <sup>2</sup>	Cyprus	Investment management	100%	-
MOL Romania PP s.r.l.	Romania	Retail and wholesale trade of fuels and lubricants	100%	100%
MOL Serbia d.o.o.	Serbia	Retail trade of fuels and lubricants	100%	100%
MOL Slovenia Downstream Investment B.V.	Netherlands	Investment management	100%	100%
MOL Slovenia d.o.o.	Slovenia	Retail trade of fuels and lubricants	100%	100%
Slovnaft Mobility Services, s.r.o.	Slovakia	Rental services	100%	100%
Tifon d.o.o.	Croatia	Retail trade of fuels and lubricants	100%	100%
<b>Corporate and other</b>				
BME Fenntartó Zrt. <sup>2</sup>	Hungary	Higher education activities	100%	-
FER Tűzoltó és Szolgáltató Kft.	Hungary	Fire services	100%	100%
Geoinform Kft.	Hungary	Hydrocarbon exploration	100%	100%
Hostin d.o.o.	Croatia	Tourism	49%	49%
INA Industrijski servisi d.o.o.	Croatia	Investment management	49%	49%
Croscio Naftni Servisi d.o.o.	Croatia	Oilfield services	49%	49%
Croscio S.A. DE C.V	Mexico	Maintaining services	49%	49%
Croscio Ukraine LLC	Ukraine	Oilfield services	49%	49%
Rotary Zrt.	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 services	49%	49%
INA Vatrogasni Servisi d.o.o.	Croatia	Firefighting services	49%	49%
MOL Aréna Kft.	Hungary	Investment management	100%	100%
MOL Biztonsági Szolgáltatások Kft.	Hungary	Security services	100%	100%
MOL CVC Investment Kft.	Hungary	Investment management	100%	100%
MOL E-mobilitás Vagyongkezelő Kft.	Hungary	Investment management	100%	100%
ITK Holding Zrt.	Hungary	Investment management	99%	94%
Inter Traction Electrics Kft.	Hungary	Motor vehicle manufacturing	99%	94%
Inter Tan-Ker Zrt.	Hungary	Passenger transportation	99%	94%
Inter Tan-Ker City Kft.	Hungary	Passenger transportation	99%	94%
Inter-Traffic Management Kft.	Hungary	Renting and operating of owned and leased vehicles	99%	94%
ITE Bus & Truck Kereskedelmi Kft.	Hungary	Vehicle sales and aftersales	99%	94%
Pendant TMSZ Kft.	Hungary	Security services	99%	94%
MOL GBS Magyarország Kft.	Hungary	Accounting services	100%	100%
MOL GBS Slovensko s.r.o.	Slovakia	Accounting services	100%	100%
MOL Group Finance Zrt.	Hungary	Investment management	100%	100%
MOL Group International Services B.V.	Netherlands	Financial and accounting services	100%	100%
MOL Ingatlan Holding Kft.	Hungary	Investment management	100%	100%
MOL Campus Kft.	Hungary	Real estate management	100%	100%
MOL C.F. Kft.	Hungary	Real estate management	100%	100%
MOL Investment Kft.	Hungary	Financial services	100%	100%
MOL IT & Digital GBS Magyarország Kft.	Hungary	IT services	100%	100%
MOL IT & Digital GBS Slovensko, s.r.o.	Slovakia	IT services	100%	100%
MOL IT Holding Kft.	Hungary	Investment management	100%	100%
MOL Magyarország Társasági Szolgáltató Kft.	Hungary	Company services	100%	100%
MOL Reinsurance Co. DAC	Ireland	Captive insurance	100%	100%
MOL RES Investments Zrt.	Hungary	Geothermal energy production	100%	100%
MOL Solar Energy Holding Kft.	Hungary	Business services	100%	100%
MOL Solar Operator Kft.	Hungary	Power production	100%	100%
Naperőmű Farm Kft.	Hungary	Power production	100%	100%
MOL Transportation Services Kft.	Hungary	Transportation services	100%	100%
MOL Vagyongkezelő Kft.	Hungary	Investment management	100%	100%
LEAD Ventures Alapkezelő Zrt.	Hungary	Venture capital fund management	100%	100%
Neptunus Investment Kft.	Hungary	Investment management	100%	100%
Fonte Viva Kft.	Hungary	Mineral water production and distribution	100%	100%
Petrolszolg Kft.	Hungary	Repairs and maintenance services	100%	100%
Slovnaft Montáže a opravy a.s.	Slovakia	Repairs and maintenance services	100%	100%
MOL Industrial Services Investment Kft.	Hungary	Investment management	100%	100%
ISO-SZER Kft.	Hungary	Construction services	100%	100%
KVV Zrt.	Hungary	Pipeline construction	100%	100%
Top Računovodstvo Servisi d.o.o.	Croatia	Accounting services	49%	49%
Új Lila Labdarúgó Kft.	Hungary	Investment management	100%	100%
Főti út 141 Ingatlankezelő Kft. <sup>2</sup>	Hungary	Other sport activities	100%	-
Újpest 1885 Futball Kft.	Hungary	Other sport activities	99%	100%
Újpest Labdarúgó Akadémia Kft.	Hungary	Other sport activities	100%	100%

1) Fully consolidated because MOL Petrolkémia Zrt. and TVK Erőmű Kft. are the only customers of Tisza-WTP Kft.; 2) Fully consolidated from 2025; 3) Liquidated in 2025; 4) Sold in 2025; 5) Merged to MOL Polska sp. z o.o. in 2025

**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, commodity derivative transactions, CO2 adjustments and impairment on raw materials, purchased finished products and own-produced inventory.

**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 inventories**

Inventories must be measured at the lower of cost or net realisable value. 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 CCS methodology, period average crude oil prices are used to reevaluate inventories, therefore impairment on inventories is excluded from EBIT to avoid double counting.

**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 reevaluates 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.

	2025 HUF million	2024 HUF million
<b>Clean CCS profit/(loss) from operation reconciliation</b>		
<b>Profit from operation</b>	<b>436,488</b>	<b>584,872</b>
Inventory holding gain/(loss)	111,932	20,912
Impairment on raw materials and own-produced inventory	4,057	(2,767)
- thereof affects raw materials	(7)	(523)
- thereof affects own-produced inventory	1,512	(2,036)
- thereof affects purchased goods/products inventory	2,552	(209)
Cargo commodity derivatives	(7,456)	14,054
CO2 adjustment	(39)	719
<b>CCS profit from operation</b>	<b>544,982</b>	<b>617,790</b>
Impact of derivative transactions	-	(2,534)
Other Clean adjustment	5,289	-
Special items	80,848	18,952
<b>Clean CCS profit from operation</b>	<b>631,119</b>	<b>634,208</b>

	2025 HUF million	2024 HUF million
<b>Special items</b>		
<b>Profit from operation excluding special items</b>	<b>517,336</b>	<b>603,824</b>
<b>Upstream</b>		
Impairment on Upstream assets in the Group*	(46,660)	(18,952)
<b>Total special items in Upstream</b>	<b>(46,660)</b>	<b>(18,952)</b>
<b>Consumer services</b>		
Impairment of Retail assets*	(34,188)	-
<b>Total special items in Consumer services</b>	<b>(34,188)</b>	<b>-</b>
<b>Corporate and Other</b>		
Impairment of Corporate and Other assets	-	-
<b>Total special items in Corporate and Other</b>	<b>-</b>	<b>-</b>
<b>Total impact of special items on profit from operation</b>	<b>(80,848)</b>	<b>(18,952)</b>
<b>Profit from operation</b>	<b>436,488</b>	<b>584,872</b>

\*more information about impairment on assets is included in Note 9/e

#### **d) Appendix IV.: Additional presentations according to the Hungarian Accounting Law**

##### **Person responsible for supervising transactional accounting and preparation of IFRS financial statements**

Name: Péter Szabó

Registration number: 199723 (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: Ákos Székely Ph.D., Group Chief Financial Officer

Address: HU – 1112 Budapest, Birs utca 4. 1 em. 4 a.

##### **Contacts**

Company name: MOL Nyrt.

Registered address: HU – 1117 Budapest, Dombóvári út 28.

Official website: [www.molgroup.info](http://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 Nyrt.

##### **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 Kft.) for the statutory audit of the 2025 consolidated and separate financial statements of MOL Nyrt. was HUF 130,6 million. The auditor including its network charged HUF 478,5 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 Nyrt. and its subsidiaries for 2025 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

2025

Electricity

Natural gas

CEEGEX

Közép-

Kelet-

Európai

Szervezett

Földgázpiac

Zrt.

MOL

Commodity

Trading

Kft.

Trading

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

MOL Nyrt.

Trading

HUF million

TVK-Erőmű

Kft.

HUF million

MOL Solar

Operátor

Kft.

HUF million

MOHU

Budapest

Zrt.

HUF million

Manufacturing

HUF million

FONTE

VIVA Kft.

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

Aufwind

Schmack

Első Biogáz

Kft.

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

Total

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

FGSZ

Földgázszállító

Zrt.

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

CEEGEX

Közép-

Kelet-

Európai

Szervezett

Földgázpiac

Zrt.

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

CEEGEX

Közép-

Kelet-

Európai

Szervezett

Földgázpiac

Zrt.

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

HUF million

## STATEMENT OF FINANCIAL POSITION

**31 Dec 2025**

	Electricity						Natural gas				
								CEEEX			
								Közép-Kelet-Európai			
								Földgázszállító	Szervezett Földgázpiac	MOL Commodity Trading Kft.	
	MOL Nyrt. Trading	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	Total	Földgázszállító Zrt.	Földgázpiac Zrt.	Trading	Total
	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million	HUF million
<b>NON-CURRENT ASSETS</b>											
Property, plant and equipment	2,777	1,586	14,025	13,700	492	3,553	36,133	271,006	34	-	271,040
Investment property	-	-	-	-	-	-	-	-	-	-	-
Intangible assets	-	-	-	6	-	-	6	5,903	68	-	5,971
Investments	-	-	-	-	-	-	-	-	-	-	-
Other non-current financial assets	-	845	2,359	-	-	-	3,204	1,417	-	33,735	35,152
Deferred tax asset	-	-	-	-	-	-	-	-	-	-	-
Other non-current assets	5	-	651	-	-	-	656	-	-	-	-
<b>Total non-current assets</b>	<b>2,782</b>	<b>2,431</b>	<b>17,035</b>	<b>13,706</b>	<b>492</b>	<b>3,553</b>	<b>39,999</b>	<b>278,326</b>	<b>102</b>	<b>33,735</b>	<b>312,163</b>
<b>CURRENT ASSETS</b>											
Inventories	(109)	37	28	248	-	51	255	5,742	-	-	5,742
Trade and other receivables	11,834	1,328	597	786	-	185	14,730	2,333	164	12,978	15,475
Securities	-	-	-	-	-	-	-	-	-	-	-
Other current financial assets	-	-	-	-	-	-	-	3	-	12,031	12,034
Income tax receivable	-	48	-	-	-	-	48	426	-	-	426
Cash and cash equivalents	-	71	-	960	-	82	1,113	6,874	765	2,846	10,485
Other current assets	50	30	18	553	-	139	790	4,050	-	6,456	10,506
Assets classified as held for sale	-	-	-	-	-	-	-	-	-	-	-
<b>Total current assets</b>	<b>11,775</b>	<b>1,514</b>	<b>643</b>	<b>2,547</b>	<b>-</b>	<b>458</b>	<b>16,937</b>	<b>19,428</b>	<b>929</b>	<b>34,310</b>	<b>54,667</b>
<b>Total assets</b>	<b>14,557</b>	<b>3,945</b>	<b>17,678</b>	<b>16,253</b>	<b>492</b>	<b>4,011</b>	<b>56,936</b>	<b>297,754</b>	<b>1,031</b>	<b>68,046</b>	<b>366,831</b>

## STATEMENT OF FINANCIAL POSITION

**31 Dec 2025**

	Electricity							Natural gas			
								CEE GEX			
								Közép-Kelet-Európai			
	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FONTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	Total	FGSZ Földgázzszállító Zrt.	Szervezett Földgázpiac 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	HUF million
EQUITY	-	-	-	-	-	-	-	-	-	-	-
Share capital	205	621	106	4,175	-	8	5,115	18,719	5	38	18,762
Retained earnings and other reserves	1,114	-	12,468	2,196	303	1,371	17,452	125,590	9	4,107	129,706
Profit/(Loss) for the year	4,322	1,665	926	3,472	(31)	(57)	10,297	43,834	349	1,358	45,541
Technical income/(expense) for the period	(31,274)	920	-	-	-	-	(30,354)	(120)	-	-	(120)
Total equity	(25,633)	3,206	13,500	9,843	272	1,321	2,509	188,023	363	5,503	193,889
	-	-	-	-	-	-	-	-	-	-	-
NON-CURRENT LIABILITIES	-	-	-	-	-	-	-	-	-	-	-
Long-term debt	-	-	278	4,385	-	-	4,663	39,197	-	-	39,197
Other non-current financial liabilities	-	-	-	-	-	-	-	-	-	-	-
Non-current provisions	-	-	-	168	-	-	168	3,546	-	-	3,546
Deferred tax liabilities	-	-	267	-	-	-	267	20,948	-	-	20,948
Other non-current liabilities	856	-	-	-	203	-	1,059	12,793	-	-	12,793
Total non-current liabilities	856	-	545	4,553	203	-	6,157	76,485	-	-	76,485
CURRENT LIABILITIES	-	-	-	-	-	-	-	-	-	-	-
Short-term debt	-	-	13	-	-	1,768	1,781	764	-	-	764
Trade and other payables	6,529	739	3,573	1,857	-	43	12,741	7,723	135	11,446	19,304
Other current financial liabilities	-	-	27	-	-	-	27	13,355	-	48,592	61,947
Current provisions	-	-	-	-	-	-	-	1,968	-	-	1,968
Income tax payable	-	-	20	-	-	-	20	308	-	578	886
Liabilities classified as held for sale	-	-	-	-	-	-	-	-	-	-	-
Other current liabilities	32,805	-	-	-	17	880	33,702	9,129	467	1,927	11,523
Total current liabilities	39,334	739	3,633	1,857	17	2,690	48,270	33,247	602	62,543	96,392
Total liabilities	40,190	739	4,178	6,410	220	2,690	54,427	109,732	602	62,543	172,877
Total equity and liabilities	14,557	3,945	17,678	16,253	492	4,011	56,936	297,754	965	68,046	366,765

Method of activity separation in the statement of profit or loss

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
<b>Net sales</b>	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 (expect green certificate)	Can be allocated directly to activities	Can be allocated directly to activities	Based on item-by-item inspection
<b>Other operating income</b>	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 (expect green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Distributed in proportion to net sales revenue	Based on item-by-item inspection
<b>Raw materials and consumables used</b>	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, and indirect expenses are distributed upon naturalia	-	Distributed from net sales (expect green certificate)	Can be allocated directly to activities	Distributed in proportion to net sales revenue	Based on item-by-item inspection
<b>Employee benefits expense</b>	Directly attributable employee benefits expenses in proportion of the headcount	-	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 (expect green certificate)	Distributed based on cost-centre classification of people	Distributed based on cost-centre classification of people	50–50 % allocation between the reporting units
<b>Depreciation, depletion, amortisation and impairment</b>	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	Breakdown of PPE and intangible assets	Distributed based on cost-centre classification of assets or in proportion to the direct asset	Distributed in proportion to net sales revenue	-

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
<b>Other operating expenses</b>	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 (expect green certificate)	Can be allocated directly to activities	Distributed in proportion to net sales revenue	Based on item-by-item inspection, in case of general cost 50–50 % allocation between the reporting units
<b>Change in inventory of finished goods and work in progress</b>	-	-	Can be allocated directly to the activities	-	-	Distributed from net sales (expect green certificate)	Can be allocated directly to activities	-	-
<b>Work performed by the enterprise and capitalised</b>	Directly attributable work performed by the enterprise and capitalise in proportion of the headcount and the net sales revenue	-	Can be allocated directly to the activities	-	-	Distributed from net sales (expect green certificate)	Can be allocated directly to activities	-	-
<b>Finance income</b>	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 (expect green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Distributed in proportion to net sales revenue	Based on item-by-item inspection, 50–50 % allocation between the two reporting units when revaluating the virtual account
<b>Finance expense</b>	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 (expect green certificate)	Can be allocated directly to activities or in proportion to the direct asset	Distributed in proportion to net sales revenue	Based on item-by-item inspection, 50–50 % allocation between the two reporting units when revaluating the virtual account

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
Income tax income/(expense)	-	Distributed in proportion to net sales revenue, except of the directly attributable industrial tax	Can be allocated directly to the activities	Calculated from modified net sales	-	Distributed from total net sales (expect green certificate)	Distributed in proportion to profit before tax	Distributed in proportion to profit before tax	50–50 % allocation between the reporting units



Method of activity separation in the statement of financial position

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FONTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
<b>Property, plant and equipment</b>	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	Can be allocated directly to the activities	-
<b>Investment property</b>	-	-	-	-	-	-	Distributed based on cost-centre classification of assets	-	-
<b>Intangible assets</b>	-	-	-	Can be allocated directly to the activities	-	-	Distributed based on cost-centre classification of assets	Can be allocated directly to the activities	-
<b>Investments</b>	-	-	-	-	-	-	Based on item-by-item inspection	-	-
<b>Other non-current financial assets</b>	-	Distributed in proportion of fixed assets	Can be allocated directly to the activities		-	-	Based on item-by-item inspection	-	50–50 % allocation between the reporting units
<b>Deferred tax asset</b>	-	-	-	Distributed in proportion to intangible assets, fixed assets and trade and other receivables	-	-	Based on item-by-item inspection	-	-
<b>Other non-current assets</b>	-	-	Can be allocated directly to the activities	-	-	-	Based on item-by-item inspection	-	-
<b>Inventories</b>	Can be allocated directly to the activities	Distributed in proportion of fixed assets	Can be allocated directly to the activities	Distributed in proportion to intangible assets, fixed assets and trade and other receivables	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-	-
<b>Trade and other receivables</b>	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	Can be allocated directly to the activities	Based on item-by-item inspection
<b>Securities</b>	-	-	-	-	-	-	Based on item-by-item inspection	-	-

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
<b>Other current financial assets</b>	-	-	-	Distributed in proportion to intangible assets, fixed assets and trade and other receivables	-	-	It is divided in proportion to the direct asset	-	Based on item-by- item inspection
<b>Income tax receivable</b>	-	Distributed in proportion to fixed assets, except of the directly attributable industrial tax	-	-	-	-	Distributed in proportion to profit before tax	-	-
<b>Cash and cash equivalents</b>	-	Distributed in proportion of fixed assets	-	Distributed in proportion to intangible assets, fixed assets and trade and other receivables	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-	Based on item-by- item inspection
<b>Other current assets</b>	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 assets and trade and other receivables	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	-	Based on item-by- item inspection
<b>Assets classified as held for sale</b>	-	-	-	-	-	-	Distributed based on cost-centre classification of assets	-	-

Method of activity separation in the statement of financial position

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FORTE VIVA Kft.	Aufwind Schrack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac 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	Can be allocated directly to the activities	50–50 % allocation between the reporting units
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	Can be allocated directly to the activities	50–50 % allocation between the reporting units
(Loss) / Profit for the year attr to owners of parent	Can be allocated directly to the activities	Activity breakdown of profit and loss account	Can be allocated directly to the activities	Can be allocated directly to the activities	Analytics	Distributed from total net sales (except green certificate)	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	Provides accounting equation	-	Can be allocated directly to the activities	-	-	Provides accounting equation	-	-
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 fixed assets	-	Distributed in proportion of related assets	-	-	It is divided in proportion to the direct asset	-	-
Non-current provisions	-	Can be allocated directly to the activities	-	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	-	Can be allocated directly to the activities	-	Analytics	-	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	-	Distributed from net sales (except green certificate)	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	Can be allocated directly to the activities	Based on item-by-item inspection
Other current financial liabilities	-	Distributed in proportion to net sales revenue	Can be allocated directly to the activities	Distributed in proportion of related assets	Analytics	-	It is divided in proportion to the direct asset	-	-
Current provisions	-	-	-	-	-	-	It is divided in proportion to the direct asset	-	-

	MOL Nyrt.	TVK-Erőmű Kft.	MOL Solar Operátor Kft.	MOHU Budapest Zrt.	FONTE VIVA Kft.	Aufwind Schmack Első Biogáz Kft.	FGSZ Földgázszállító Zrt.	CEEGEX Közép- Kelet-Európai Szervezett Földgázpiac Zrt.	MOL Commodity Trading Kft.
<b>Income tax payable</b>	-	-	Can be allocated directly to the activities	-	-	-	Distributed in proportion to profit before tax	-	-
<b>Liabilities classified as held for sale</b>	-	-	-	-	-	-	It is divided in proportion to the direct asset	-	-
<b>Other current liabilities</b>	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	-	Distributed from net sales (except green certificate)	It is divided in proportion to the direct asset	Allocation is based on revenue and cost proportions	-

## f) Appendix VI.: Report on corporate income tax information

MOL Group is a leading integrated Central Eastern European oil and gas corporation headquartered in Budapest, Hungary. The Group operates under special attention from a considerable number of stakeholders, where transparency is the primary means by which to communicate the Group's activities. In general, MOL Group seeks to proactively meet and exceed disclosure expectations from its stakeholders by consistently reporting both financial and non-financial data beyond what is legally required.

This country-by-country corporate tax information report has been prepared and published in accordance with the provisions of Directive 2021/2101/EU, the amendments to Directive 2013/34/EU, and Chapter VI/B of the Act C of 2000 on Accounting ("Accounting Act") regarding the provision of country-by-country information.

The purpose of the report is to present in a transparent manner the activities, tax situation and economic presence of the MOL Group in relation to the countries in which it operated during the reporting period.

The corporate tax information report is compiled based on information from the unified accounting, consolidation and data reporting systems used by MOL Group. The data included in the report are for the 2025 business year, in accordance with the relevant EU and domestic legal requirements. The income tax contains the income taxes under IAS 12 in the report.

### Section 1. General information

Name of the ultimate parent of the group / of the standalone undertaking	MOL Group
Country where the ultimate parent has its registered office	Hungary
Financial year – start date	1 January 2025
Financial year – end date	31 December 2025
Reporting currency	HUF million
Is the information in the report based on reporting instructions used for tax purposes, pursuant to Section III, Parts B and C, of Annex III to Council Directive 2011/16/EU (yes/no)?	yes

## Section 2. Overview of information on a country-by-country basis

Tax jurisdiction	Country code	Revenues	Profit (loss) before income tax	Income tax paid – on cash basis	Income tax accrued – current year	Accumulated earnings	Number of employees
Austria	AT	205,638	924	619	511	14,012	125
Croatia	HR	1,718,296	84,136	19,484	18,563	206,788	8,203
Cyprus	CY	1,100	112	0	0	1,015,290	0
Czech Republic	CZ	512,034	17,533	5,250	3,913	(703)	178
Germany	DE	99,411	5,275	747	1,755	8,991	80
Hungary	HU	6,351,469	119,088	43,854	61,516	2,979,044	14,494
Ireland	IE	8,317	371	131	125	21,553	0
Italy	IT	765,338	9,194	131	558	10,717	117
Montenegro	ME	45,619	392	0	40	(878)	135
Netherlands	NL	125,166	123,036	215	1,239	(173,937)	2
Poland	PL	466,786	(3,676)	1,131	705	42,892	298
Romania	RO	503,306	21,672	2,911	4,130	44,477	291
Slovakia	SK	2,332,765	128,236	34,867	66,137	326,989	3,156
Slovenia	SI	567,602	10,938	1,662	2,335	31,535	162
All other jurisdictions		781,499	67,838	8,788	8,893	(34,494)	1,399

### Section 3. List of subsidiaries and activities

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Austria	AT	Roth Energie GmbH	Sales, Marketing or Distribution
		MOL Austria Handels GmbH	
		Petrolszolg Austrian Branch	
Croatia	HR	Tifon d.o.o.	Research and Development Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Administrative, Management or Support Services Provision of Services to Unrelated Parties Internal Group Finance Holding Shares or Other Equity instruments Other
		CROPLIN d.o.o.	
		Croscos naftni servisi d.o.o.	
		HOSTIN d.o.o.	
		INA INDUSTRIJSKI SERVISI d.o.o.	
		INA Maloprodajni servisi d.o.o.	
		INA MAZIVA d.o.o.	
		INA VATROGASNI SERVISI	
		INA, d.d.	
		Plavi tim d.o.o.	
		STSI - INTEGRIRANI TEHNIČKI SERVISI d.o.o.	
		TOP RAČUNOVODSTVO SERVISI d.o.o.	
		JADRAN Usluge D.O.O.	
		OT Industries Fővállalkozó Zrt. - horvát fióktelep	
Cyprus	CY	MOL Rhea Ltd	Research and Development Holding Shares or Other Equity instruments
		MOL CZ Inv. Cyprus Ltd	
		MOL Slovenia Inv. Cyprus	
		MOL Dionysus Ltd	
		MOL Uranus Ltd.	
		MOL Vector Ltd.	
		MOL E&P Cyprus Ltd.	
		Greentrade Ltd.	
		USI Ltd.	
Czech Republic	CZ	MOL Ceska Rep.s.r.o.	Purchasing or Procurement Sales, Marketing or Distribution
Germany	DE	MOL Germany GmbH	Manufacturing or Production Sales, Marketing or Distribution
		Aurora Kunststoffe G	
		KVV Kivitelező Zrt. - német fióktelep	
Hungary	HU	MOL Nyrt.	Research and Development Holding or Managing Intellectual Property Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Administrative, Management or Support Services Provision of Services to Unrelated Parties Internal Group Finance Holding Shares or Other Equity instruments Other
		Geoinform Kft	
		MOLTRADE-Mineralimpex Zrt	
		MOLTRANS Kft	
		Petrolszolg Kft.	
		Terméktároló Zrt	
		Tisza-WTP Kft.	
		MOL Solar Energy Holding	
		FER Tűzoltóság Kft.	
		MOL Commodity Trading Kft	
		MOL CVC Investment Kft.	
		MOL Aréna Kft.	
		Leodium Investment	
		MOL Mo. Társasági Szolg.	
		EMSZ Koncessziós Kft.	
		MOL GBS Magyarország Kft.	
		MOL IT & Digital GBS Mo	
		MOL Investment Kft.	
		KMSZ Koncessziós Kft.	
		MOL Retail Holding Kft.	
		MOL Kisker. Ingatlan Kft.	
		Csanád Szénhidrogén Konc.	
		Tápió Szénhidrogén Konc.	
		MOL Industrial Serv. Inv.	
		MOL Solar Operator	
		MOL Group Finance Zrt	
		OLAJTERV Tervező Zrt	
		KVV Zrt.	



Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Hungary	HU	MOL E-mobil Vagyon	Research and Development Holding or Managing Intellectual Property Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Administrative, Management or Support Services Provision of Services to Unrelated Parties Internal Group Finance Holding Shares or Other Equity instruments Other
		MOL IT Holding Kft.	
		MOL Bázakerettye Kft	
		MOL Okány-Nyugat Kft	
		MOL Zala-Nyugat Kft.	
		MOL Ingatlan Holding	
		MOL Campus Kft.	
		MOL Fleet Holding Kf	
		MOL Fleet Solution Flotta	
		MOL Limitless Mobil. Hold	
		MOL LIMO	
		ISO-SZER Építőipari Kft.	
		MOL Kunststoff Kft.	
		MOL Somogyvámos Szén	
		MOL Őrség Szénhidrog	
		MOL C.F. Kft.	
		Neptunus Investment	
		FORTE VIVA Kft.	
		MOL Dráva Szénhidrog	
		MOL SZMDK Koncessziós Kft	
		MOL Nyírség-Dél Konc	
		MOL Nyírség-Észak Ko	
		Fresh Corner Restaur	
		Fresh Corner Restaur	
		MOL Bizt. Szolg. Kft	
		MOL REMA Holding Kft	
		MOL Körforgásos Gazd. Kft	
		Recrea Asset Management	
		ReMat Zrt	
		MOL Transport. Serv.	
		MOHU Zrt.	
		MOHU Budapest Zrt.	
		MOHU Holding Kft.	
		Aufwind Schmack E. Biogáz	
		Lead Ventures Zrt.	
		MOL RBS Holding Kft	
		MOL RBS Operator Kft	
		Új Lila Labdarúgó Kft	
		Újpest 1885 Futball Kft	
		Újpest Labdarúgó Akadémia	
		Vivienvíz Kft.	
		Greenpet Recycle Kft	
		RE-POL Innovációs T. Kft.	
		MOL Mercarius Holding Kft	
		Mercarius Flottakezelő	
		Mercarius Mercar Kft.	
		CEEGEX Zrt.	
		Naperőmű Farm Kft.	
		Endrőd Gázipari Kft.	
		MOL LPG Europe Kft.	
		MOL Kiskőrös Szénh. Kft.	
		BME Fenntartó Zrt.	
		Fóti út 141 Ingatlan Kft.	
		MOL Vagyonkezelő Kft.	
		MOL RES Investments Zrt	
		ITK Holding Zrt.	
		MOL Petrolkémia Zrt.	
		FGSZ Zrt.	
		TVK Erőmű Term.Szolg. Kft	
		MOL-LUB Kft.	
		Crosco integrated drilling & well service Co. Ltd. - Hungarian branch office	

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Hungary	HU	Rotary Zrt.	Research and Development Holding or Managing Intellectual Property Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Administrative, Management or Support Services Provision of Services to Unrelated Parties Internal Group Finance Holding Shares or Other Equity instruments Other
		ALFAGAS Kft.	
		FGP Zrt.	
		FGSZ KP Kft. "v.a"	
		Geofizikai Szolgáltató Kft.	
		ITK City Operations Kft.	
		Metal Waste Solution Kft.	
		MOL Bucsá Kft.	
		MOL H60	
		MOL Racing Kft.	
		MOL Sustainable Future Holding Kft.	
		MOL Vendéglátó Kft.	
		OT INDUSTRIES Eszközhasznosító	
		OT INDUSTRIES Fővállalkozó Zrt.	
		OT INDUSTRIES-DKG Gépgyártó Zrt	
		LEAD Capital Zrt	
		LEAD Property Zrt.	
		NHSZ Észak-KOM Nonprofit Kft.	
		NHSZ Gyöngyösi Reg. Hulladékkezelő Kft.	
		NHSZ Mátra Hulladékkezelő Nonprofit Kft.	
		NHSZ Miskolc Kft.	
		NHSZ Tatabánya Zrt.	
		NHSZ Tapolca Nonprofit Kft.	
		NHSZ Csobánc Kft.	
		NHSZ TISZA Nonprofit Kft.	
		NHSZ Vértess Védke HG Nonprofit Kft.	
		Inter Traction Electrics Kft.	
		Inter Tan-Ker Zrt.	
		Inter Tan-Ker City Kft.	
		Inter-Traffic Management Kft.	
		Pendant TMSZ Kft.	
		ITE Bus & Truck Kereskedelmi Kft.	
		NHSZ Dabas Kft.	
		NHSZ OKÖT Nonprofit Kft.	
		NHSZ Szolnok Köszolg. Nonprofit Kft.	
		NHSZ Zounok Zrt.	
		Kaposvári HG Nonprofit Kft.	
		NHSZ Kétpó Kft	
		TVK Ingatlankezelő Kft.	
Ireland	IE	MOL Reinsurance DAC	Insurance
Italy	IT	Adriagas	Sales, Marketing or Distribution Other
		Crocco integrated drilling & well service Co. Ltd. - Italian branch office	
		IES Gestioni S.r.l.	
		IES Italiana Energia e Servizi S.p.A.	
		IES Logistic Services S.r.l.	
		MOL Italia S.r.l.	
Montenegro	ME	Panta Distribuzione S.r.l.	Sales, Marketing or Distribution
		INA CRNA GORA	
Netherlands	NL	MOL CZ DS Investment B.V.	Administrative, Management or Support Services Holding Shares or Other Equity instruments
		MOL Slovenia DS Investmen	
		MOL Pakistan Ltd.	
		MH Oil and Gas B.V.	
		MNS Oil and Gas B.V.	
		MOL (FED) Kazakhstan B. V	
		Kalegran B.V	
		MOL Group Int. Services B	
		MOL Crossroads B.V.	
Poland	PL	MOL Cameroon B.V. - HO	Sales, Marketing or Distribution
		Slovnaft Polska S.A.	
		MOL Polska sp. z o.o.	
		KVV Kivitelező Zrt. - lengyel fióktelep	

Member State or tax jurisdiction	Country code	Name of each subsidiary undertaking in the Member State or tax jurisdiction	Brief description of the nature of activities in the Member State or tax jurisdiction
Romania	RO	MOL Romania PP s.r.l.	Research and Development Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Other
		MOL RBS S.r.l.	
		Panfora Oil & Gas	
		SC Sistemgas S.r.l.	
Slovakia	SK	MOL GBS Slovakia s.r.o.	Purchasing or Procurement Manufacturing or Production Sales, Marketing or Distribution Administrative, Management or Support Services Provision of Services to Unrelated Parties Internal Group Finance Holding Shares or Other Equity instruments Dormant
		SN Montaze	
		Zvaz pre sklad.zásob,a.s.	
		MOL IT & Digital GBS Slo	
		Slovnaft Mobility Se	
		Slovnaft Trans a.s.	
		VÚRUP a.s.	
		Dalby a.s.	
		SLOVNAFT, a.s.	
		APOLLO Rafinéria, s.r.o.	
		ReMat Slovakia s.r.o.	
		OT Industries Fővállalkozó Zrt. - szlovák fióktelep	
		KVV Kivitelező Zrt. - szlovák fióktelep	
		MOL Mo. Társasági Szolg. Kft. - szlovák fióktelep	
Slovenia	SI	MOL Slovenija d.o.o.	Sales, Marketing or Distribution
		MOL & INA d.o.o.	
		INA SLOVENIJA d.o.o.	

## Section 4.: Explanations for material discrepancies between income tax paid and accrued

This section provides additional context to support the interpretation of the Group's income tax position. It outlines the key drivers behind any material differences between income tax accrued in the current year and the income tax paid during the reporting period. These differences may result from a range of different factors, varying according to the specific tax frameworks and administrative practices of the countries in which the Group operates.

### Czech Republic

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

### Germany

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

### Hungary

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

Period differences - Tax liabilities from previous year(s) are settled in later period, which are based on the prior years' accounting results.

Tax liabilities based on the prior years' accounting results were paid this year, resulting a difference between the tax accrued and paid.

### Italy

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

### Netherlands

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

Exchange rate impact – In some cases, taxes were paid in a different currency, so the exchange rate impact significantly affected the difference between the tax paid and the tax accrued.

### Romania

Period differences - Tax liabilities from previous year(s) are settled in later period, which are based on the prior years' accounting results.

Tax liabilities based on the prior years' accounting results were paid this year, resulting a difference between the tax accrued and paid.

### Slovakia

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.

### Slovenia

Payment of tax advance - The tax advance paid during the year is determined based on the tax declared and paid in prior years.

The tax advances determined based on the tax declared and paid in previous years differed significantly from the tax accrued accounted for in the current year.