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2030

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MOL GROUP 2021 GRI REPORTING TABLE

14 APRIL 2022



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GRI REPORTING TABLE: INTRODUCTION

- ▶ MOL Group has over the years been applying the GRI standards as the main reporting framework for its non-financial (sustainability) reporting.
- ▶ The use of the GRI Standards was based on the strategy of aiming for global best practices for reporting publicly on a wide range of economic, environmental and social impacts.
- ▶ The GRI standards provide MOL Group with the possibility of presenting non-financial disclosure to a wide stakeholder group.
- ▶ In 2017, MOL Group switched to the new GRI standards from the previous G4 standards.
- ▶ In 2018, MOL Group re-designed its sustainability reporting framework, including the GRI Standards.
- ▶ As a result, MOL Group created a new, highly transparent "GRI Reporting Table" where all 162 indicators, including the GRI sector supplement for 'Oil & Gas sector disclosures' guidelines, are presented separately.
- ▶ Each page contains a number of features providing full transparency and comparability, allowing investors, analysts and a wider stakeholder base to assess each indicator separately.
- ▶ Each GRI indicator is cross-referenced to other non-financial (sustainability) reporting framework where applicable, whilst supporting data/links are provided.
- ▶ The GRI Reporting Table together with the Sustainability Report and the Data Library form MOL Group's sustainability reporting: Annual Report and Data Library: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>
- ▶ The "GRI Reporting Table" is updated annually and published alongside the Annual Report and Data Library on the day of the Annual Shareholders Meeting.

GRI REPORTING TABLE: DESCRIPTION

The screenshot shows a GRI reporting table interface. At the top, there is a navigation bar with five tabs: GRI 102 (General Disclosures), GRI 103 (Management Approach), GRI 200 (Economic), GRI 300 (Environmental), and GRI 400 (Social). The GRI 102 tab is selected and highlighted in dark blue. Below the navigation bar, the main content area is titled 'GENERAL DISCLOSURES' and contains the following elements:

- 1**: A menu icon (three horizontal lines) in a circle, located at the top left of the GRI 102 tab.
- 2**: The GRI 102 tab header, which includes the GRI standard title 'GENERAL DISCLOSURES', the GRI standard number '102', and the GRI topic-specific standard 'ORGANIZATION PROFILE'.
- 3**: A sub-header '102-1 Name of organization'.
- 4**: A row of reporting status indicators: 'REPORTING' (grey), 'FULLY REPORTED' (green), 'EXTERNAL ASSURANCE' (grey), 'N/A' (white), 'ANNUAL REPORT PAGE' (grey), and 'N/A' (white). To the right of these indicators are logos for SASB, the UN Sustainable Development Goals, and TCFD.
- 5**: A circular icon with 'SASB' text, representing a cross-reference.
- 6**: The main text of the disclosure: 'The name of the organization is MOL Magyar Olaj- és Gázipari Nyrt (henceforth MOL Group)'. Below this text is a blue hyperlink: <https://molgroup.info/en/contact-us>.
- 7**: A table with two columns: 'SUPPORTING DATA' and 'NAME OF INDICATOR'. The 'SUPPORTING DATA' column contains 'N/A' and the 'NAME OF INDICATOR' column contains 'N/A'.
- 8**: A table with two columns: 'LINK' and 'EXCEL SHEET'. The 'LINK' column contains 'N/A' and the 'EXCEL SHEET' column contains 'N/A'.

LEGEND

- 1** BACK TO TABLE OF CONTENT
- 2** GRI STANDARD TITLE, GRI STANDARD NUMBER, AND GRI TOPIC-SPECIFIC STANDARD
- 3** DISCLOSURE NUMBER / SUB-TITLE
- 4** FULLY REPORTED, PARTLY REPORTED OR OMITTED. EXTERNAL ASSURANCE ANNUAL REPORT PAGE
- 5** CROSS-REFERENCES
- 6** SUPPORTING NARRATIVE INCL. WEBSITE LINKS AND REASONING FOR PARTLY REPORTED OR OMISSIONS
- 7** SUPPORTING DATA AND NAME OF INDICATOR
- 8** LINK TO NARRATIVE / DATA

GRI REPORTING TABLE: CROSS-REFERENCES

1

2

3

4

5

6

7

8

GRI 102 ⇒ **GRI 103** ⇒ **GRI 200** ⇒ **GRI 300** ⇒ **GRI 400**

GENERAL DISCLOSURES MANAGEMENT APPROACH ECONOMIC ENVIRONMENTAL SOCIAL

102 ORGANIZATION PROFILE

102-1 Name of organization

REPORTING FULLY REPORTED EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A

SASB TCFD

Through the *GRI Reporting Table*, MOL Group presents all 162 indicators separately, including the GRI sector supplement for 'Oil & Gas Sector Disclosures' guidelines. All 158 indicators are cross-referenced, where possible, to the Sustainability Accounting Standards Board (SASB), the UN Sustainable Development Goals (SDG), and the Task Force on Climate-related Financial Disclosure (TCFD).

Cross-references to SASB include the *Sustainability Accounting Metric Codes* from SASB's Materiality Map from primarily three different SASB industry categories given the integrated nature of MOL Group (1-3 below), whilst also incorporating to a lesser extent other industry categories where relevant (4-5 below):

1. Oil & Gas - Exploration & Production
2. Oil & Gas - Refining & Marketing
3. Chemicals
4. Multiline and Specialty Retailers & Distributors
5. Advertising and Marketing

For the 2019 GRI Reporting Table, MOL introduces new Metric Codes from SASB's Materiality Map from two new industry categories following the release of new information: *a) Metals & Mining* driven by investor request for information regarding the Group's exposure to tailings waste, as well as *b) Road Transportation* due the increasing disclosure around road safety given the considerable size of the Group's logistics division (truck and rail), as well as involuntary vs voluntary turnover rates (although the disclosure for the turnover rates applies to the whole Group. Disclosure broken down by division, including logistics, is under consideration).

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A

LEGEND

- 1 BACK TO TABLE OF CONTENT
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- 3 DISCLOSURE NUMBER / SUB-TITLE
- 4 FULLY REPORTED, PARTLY REPORTED OR OMITTED. EXTERNAL ASSURANCE ANNUAL REPORT PAGE
- 5 **CROSS-REFERENCES**
- 6 SUPPORTING NARRATIVE INCL. WEBSITE LINKS AND REASONING FOR PARTLY REPORTED OR OMISSIONS
- 7 SUPPORTING DATA AND NAME OF INDICATOR
- 8 LINK TO NARRATIVE / DATA

GRI REPORTING TABLE: CROSS-REFERENCES

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GRI 102
⇒
GRI 103
⇒
GRI 200
⇒
GRI 300
⇒
GRI 400

2
GENERAL DISCLOSURES
MANAGEMENT APPROACH
ECONOMIC
ENVIRONMENTAL
SOCIAL

3
102 ORGANIZATION PROFILE

3
102-1 Name of organization

4
REPORTING
FULLY REPORTED
EXTERNAL ASSURANCE
N/A
ANNUAL REPORT PAGE
N/A

6


EM-EP-110α
Oil & Gas
Exploration & Production

EM-RM-110α
Oil & Gas
Refining & Marketing

RT-CH-110α
Chemicals





G
GOVERNANCE

S
STRATEGY

R
RISK MANAGEMENT

M
METRICS & TARGETS

7
SUPPORTING DATA
N/A
NAME OF INDICATOR
N/A

8
LINK
N/A
EXCEL SHEET
N/A

LEGEND

- 1 BACK TO TABLE OF CONTENT
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GRI REPORTING TABLE: CONTENT INDEX

■ FULLY REPORTED /
 ■ PARTLY REPORTED /
 ■ OMITTED

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 ■ OMITTED

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GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ORGANIZATION PROFILE

102-1

Name of organization

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

The name of the organization is

MOL Magyar Olaj- és Gázipari Nyrt.

(henceforth MOL Group)

<https://molgroup.info/en/contact-us>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-2 Activities, brands, products, and services

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

12-29



MOL Group is an integrated, international oil and gas company. Description of MOL Group's activities and information on primary brands, products, and services can be obtained from the website as well as from capital markets communication materials:

PRODUCTS AND SERVICES:

For consumers: <https://molgroup.info/en/for-consumers>

For business partners: <https://molgroup.info/en/for-business-partners>

DOWNSTREAM:

<https://molgroup.info/en/our-business/downstream/mol-group-downstream>

UPSTREAM:

<https://molgroup.info/en/our-business/exploration-and-production/mol-group-upstream-1>

INNOVATIVE BUSINESS AND SERVICES:

<https://molgroup.info/en/our-business/innovative-businesses-and-services>

GAS MIDSTREAM:

<https://molgroup.info/en/our-business/natural-gas-transmission/natural-gas-transmission-1>

ANNUAL REPORT – page 26-32 MD&A Operational Overview:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

INVESTOR RELATIONS PRESENTATIONS – page 12-29:

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-3 Location of headquarters

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



MOL Group HQ location:

MOL Group
Október huszonharmadika utca 18.
1117 Budapest
Hungary

<https://molgroup.info/en/contact-us>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-4 Location of operations

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-120a.2.



TCFD

Visual description of MOL's location of operations can found in the links below:

MOL has production assets in 13 countries with production activity in 9 countries.

Name of the countries MOL has production activities: Hungary, Slovakia, Czech Republic, Croatia, Slovenia, Romania, Serbia, Montenegro, Bosnia and Herzegovina

GROUP-WIDE OVERVIEW

<https://molgroup.info/en/about-mol-group/mol-group-worldwide>

UPSTREAM:

<https://molgroup.info/en/our-business/exploration-and-production/mol-group-upstream-1>

DOWNSTREAM:

<https://molgroup.info/en/our-business/downstream/production-sites>

CONSUMER SERVICES

<https://molgroup.info/en/our-business/innovative-businesses-services/retail>

GAS MIDSTREAM:

<https://molgroup.info/en/our-business/natural-gas-transmission/natural-gas-transmission-1>

NUMBER OF REFINERIES IN OR NEAR AREAS OF DENSE POPULATION: MOL Group currently operates 3 refineries that are located in or near (within 49 kilometers) urbanized areas of dense population (urbanized area defined as population greater than 50,000). Below is the list of MOL Group's three refineries listed by distance to the nearest urbanized area, including (in brackets) longitude/latitude of the refinery and a link to the refinery location (Google Maps):

Slovnaft Refinery (48.130525, 17.173137) located within 10 km from Bratislava (pop. 400,000+) [LINK TO REFINERY LOCATION](#)

Rijeka Refinery (45.285853, 14.534124) located within 10 km from Rijeka (pop. 125,000+) [LINK TO REFINERY LOCATION](#)

Danube Refinery (47.297822, 18.889136) located within 30 km from Budapest (pop. 1.8 million+) [LINK TO REFINERY LOCATION](#)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-5 Ownership and legal form

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

46, 49-50



Detailed information about the nature of MOL's ownership and legal form can be obtained from the website and from the annual report, as well as from from capital markets communication materials (last link) which are updated on a regular basis:

<https://molgroup.info/en/investor-relations/mol-shares>

ANNUAL REPORT AND DATA LIBRARY – page 46, and 49-50:
<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

INVESTOR RELATIONS PRESENTATIONS – page 46 and 63:
<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-6 Markets served

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

2-3, 30



Overview of markets served can be obtained in the links below, as customers include both B2B and B2C:

FOR CONSUMERS: <https://molgroup.info/en/for-consumers>

FOR BUSINESS PARTNERS: <https://molgroup.info/en/for-business-partners>

ANNUAL REPORT on page 64.: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

DOWNSTREAM – with locations in Százhalombatta, Bratislava, Tiszaújváros, Urinj:
<https://molgroup.info/en/our-business/downstream/production-sites>

UPSTREAM - production assets in 13 countries with production activity in 9 countries, specifications on the interactive map:
<https://molgroup.info/en/our-business/exploration-and-production/mol-group-upstream-1>

CONSUMER SERVICES - leading role on the Croatian, Hungarian, Slovakian and Bosnian retail markets and represent the premium segment in Czech Republic, Romania and Slovenia. Additionally, we also have a retail presence in Serbia and Montenegro. Consumer types at the annual report on page 30
<https://molgroup.info/en/our-business/innovative-businesses-services/retail>
<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

GAS MIDSTREAM - Aside from domestic natural gas transmission, FGSZ conducts transmission activities towards Serbia, Bosnia-Herzegovina, Romania, Croatia, Ukraine and Slovakia.
<https://molgroup.info/en/our-business/natural-gas-transmission/natural-gas-transmission-1>

INVESTOR RELATIONS MATERIALS PROVIDING ADDITIONAL INFORMATION ON MARKETS SERVED, AND CUSTOMERS on page 2-3:
<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-7 Scale of the organization

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Overview of the scale of the organization and main operations can be obtained through the link below:

<https://molgroup.info/en/about-mol-group/company-overview>

Details on the quantity and services offered by MOL Group can be accessed on the following link:

<https://molgroup.info/en/for-consumers>

Total number of employees: 24,291 (from annual report page 126.)

Net sales: 5,959,307 million HUF (from annual report page 63.)

Market capitalization: USD 6 BN

The company operates 96 companies in 4 key business areas: Upstream, Downstream, Innovative Businesses and Services, Natural Gas Transmission – operation details can be obtained from our website and the annual report

<https://molgroup.info/en/our-business>

Capital structure:

The Group monitors capital structure using net gearing ratio, which is net debt divided by total capital plus net debt.

The Group is currently in low net gearing status, the credit metrics decreased in 2021. As of 31 December 2021, the net debt/EBITDA is at 0.6 level (2020: 1.6) while the net gearing is 18% (2020: 27%).

Information on Debt, Equity and Financial risk can be obtained through the Annual Report from page 95-107.

Latest data can be downloaded through capital markets presentations, information sheets, as well as Annual Report and Data Library can be obtained through the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-8 Information on employees and other workers

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Information on MOL Group's employees and other workers can be obtained through the Data Library's Human Capital section and Annual Reports, and on the group website via the links below:

The following indicators can be found in the Data Library – Human Capital sheet

- 102-8-a: Total number of employees by employment contract (permanent and temporary) by gender
- 102-8-b: Total number of employees by employment contract (permanent and temporary), by region
- 102-8-c: Total number of employees by employment type (full-time and part-time), by gender

Comments on remaining indicators:

- 102-8-d: Depending on the country business model, retail service station employees and service station management is either employed by MOL Group (in Croatia) or via contractual partners (in Hungary).
- 102-8-e: No significant variations observed
- 102-8-f: Data was compiled based on the annual data collection, that was done in January 2022 on a company and segment level. It is based on 2021/12/31 closing status, and all companies add up the number of their employees, based on their contract type (indefinite or fixed-term). Data was provided by the relevant HR analytics contacts in each company.

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Workforce

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-9 Supply chain

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

139



MOL Group Procurement and Supply Chain Management ensure the identification, sourcing, access and management of the external resources that MOL Group needs to fulfill its strategic objectives. The function is exploring supply market opportunities to implement category and sourcing strategies that deliver the best possible supply outcome to the organization, its stakeholders and customers. In our activities we manage the potential risks involved while also identifying and harnessing the potential opportunities that arise. MOL Group enters into relationships and conduct business with thousands of suppliers (manufacturers, service providers) from more than 40 countries (regionally and worldwide) given the size and international presence of the Group. MOL Group is committed to build and maintain a responsible and sustainable supply chain. Hence why interactions with suppliers are based on compliance with all relevant laws and regulations and the highest ethical standards. MOL Group supports suppliers to comply with them, and also set requirement to behave in a responsible and sustainable manner. MOL Group places particularly emphasis on avoiding and prohibiting corrupt practices in all circumstances, whether in dealings with representatives of either the public or private sector. Furthermore, MOL Group emphasizes the respect of human rights and condemns human rights abuses in any form. We expect suppliers to comply with relevant health, safety and environmental laws, legal and MOL Group regulations, and norms of fair competition.

We structured our function into three main areas in line with MOL Group business divisional structure: Category Management (Plan-to-Strategy), Sourcing (Source-to-Contract) and Supply Chain Management (Demand-to-Delivery).

Category Management is a key driver for maximizing value creation by procurement activities – as it is responsible for establishing cross-functional category management groups across MOL Group, besides pro-actively planning and defining category strategies for all managed procurement categories, as well as, it is providing focused expertise and supplier market intelligence, while it is leveraging MOL Group global spend and assisting sourcing in defining sourcing and contracting plans and strategies.

Sourcing is the process of fulfilling certain internal procurement demand with concluding a new agreement as a result of a supplier selection procedure. It is managed along framework and direction defined in the relevant approved Category Strategy.

The duties of SCM consist of Operative Procurement, Inventory Management and Inventory Logistics to provide end-to-end Supply Chain Management services.

More information on the Supply chain is available in the annual report on page 139: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

FOR ADDITIONAL SUPPLY CHAIN AND/OR PROCUREMENT RELATED INFORMATION GO TO GRI 204-1 / 308-1 / 308-2 / 414-1 / 414-2

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ORGANIZATION PROFILE

102-10

Significant changes to the organization and its supply chain

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

100-102,
135



MOL Group regularly updates capital markets and its stakeholders with information concerning significant changes to the organization and its supply chain. This information can be obtained through a range of sources from the following links:

Specific information on Supply Chain is available in the Annual Report on page 139.: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>
More information on Responsible Procurement is available on the website under <https://molgroup.info/en/about-mol-group/supplier-center>

Specific information on changes in the share capital is available in the Annual Report on page 100-102: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Information on facilities and changes in their operations is available in the Annual Report on page 137: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

More information regarding organizational changes is available through official company communication:

INVESTOR PRESENTATIONS

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

PRESS RELEASES

<https://molgroup.info/en/press-releases>

REGULATED INFORMATION

<https://molgroup.info/en/investor-relations/regulated-information>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ORGANIZATION PROFILE

102-11

Precautionary Principle or approach

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Information on how MOL Group applies to Precautionary Principle or approach can be obtained through the following link under Group HSE Strategy:

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ORGANIZATION PROFILE

102-12

External Initiatives

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-530a.1/ EM-RM-530a.1



16



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-13 AND GRI 415-1

The list of externally-developed economic, environmental and social charters, principles, and other initiatives to which MOL subscribes, or endorses can be found on the link below:

https://molgroup.info/storage/documents/sustainability/commitments_to_external_initiatives.pdf

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 ORGANIZATION PROFILE

102-13 Membership of associations

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-530a.1/EM-RM-530a.1/RT-CH-530a.1



16



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-12 AND GRI 415-1

The list of MOL Group's main memberships of industry or other associations, and national or international advocacy organizations can be found on the link below.

https://molgroup.info/storage/documents/sustainability/commitments_to_external_initiatives.pdf

<https://molgroup.info/en/sustainability/our-commitments>

During 2021, MOL Group's total spending on membership fees for EU, international and national associations amounted to EUR 1.045 thousand. The breakdown of the total FY 2021 Group's membership fees consisted of the following amounts:

- EU Policy:** Combined yearly fee of EUR 537 thousand covering main EU Policy associations, incl. EPRA (FuelsEurope and Concawe), Cefic and IOGP, with topics covering a range of issues, including the European Green Deal, sustainable finance, renewable energy, energy efficiency, emission trading, circular economy, regulation of industrial emissions, occupational and process safety etc.
- EU and International Associations:** Combined yearly fee of EUR 173 thousand covering professional associations within the oil & gas, petrochemical industries, with topics including but not limited to industry decarbonization, low-carbon fuels, pipelines, chemical products, polyol products etc.
- National Associations for Hungary, Slovakia and Croatia:** Combined yearly fee of EUR 335 thousand covering a number of topics including employers rights, product categories (chemicals, fuels etc.), transport, infrastructure, energy efficiency etc.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 STRATEGY

102-14 Statement from senior decision maker

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

4



A statement from the Chairman-CEO and Group CEO is published each year in the MOL Group Integrated Annual Report, available in the latest report on page 4.:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A

**GRI 102****GRI 103****GRI 200****GRI 300****GRI 400****GENERAL DISCLOSURES****MANAGEMENT APPROACH****ECONOMIC****ENVIRONMENTAL****SOCIAL****102****STRATEGY****102-15****Key Impacts, risks and opportunities**

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

10-11, 17-19, 139

Given the size of MOL Group, its socio-economic impact in the CEE region, the nature of the oil & gas industry, and the gradual transition to a low-carbon economy, MOL Group faces a wide range of multidisciplinary impacts, risks and opportunities. MOL Group provides a wealth of information, mostly through capital markets communication materials and the integrated annual report. These include: a) description of governance mechanisms in place specifically to manage main risks (links 1 and 2); b) description of the most important risks and opportunities arising from sustainability trends (links 3 and 4); c) description of significant economic, environmental and social impacts, and associated challenges and opportunities (link 3); d) key economic, environmental, and social topics as risks and opportunities according to their relevance for long-term organizational strategy, competitive position, qualitative, and quantitative financial value drivers (link 3); f) the impact of sustainability trends, risks, and opportunities on the long-term prospects and financial performance of the organization (links 3 and 4); e) targets, performance against targets (links 4 and 5).

- 1) <https://molgroup.info/en/investor-relations/corporate-governance> (under section „Main risk management tools“)
- 2) <https://molgroup.info/en/sustainability/our-commitments> (under section „Policy and management system“)
- 3) <https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (available on pages 10-11, 17-19, and 139)
- 4) <https://molgroup.info/en/investor-relations/publications#nav-investor-presentations> (available from the presentation slide 15)

MOL introduced its refreshed long-term 2030+ strategy in February 2021.

<https://molgroup.info/en/strategy-2030>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ETHICS AND INTEGRITY

102-16

Values, principles, standards, and norms of behavior

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16



MOL Group values, principles, standards and norms of behavior are widely published in the following links:

<https://molgroup.info/en/sustainability/ethics-and-governance>

Code of Ethics and Business Conduct document available here: https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

<https://molgroup.info/en/speak-up>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

ETHICS AND INTEGRITY

102-17

Mechanisms for advice and concerns about ethics

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16



MOL Group Compliance & Ethics department operates a corporate grievance mechanism called "SPEAK-UP!" (first link below) under the coordination of the Group Ethics Officer and according to the Ethics Council Rules of Procedure (second-third link below) as questions are answered, complaints are investigated, and the Ethics Council assesses the raised issues. The full list can be obtained from 2016-2020 Data Library. In 2021, the Rules of Procedure policy had been divided into two separate policies: 1. Ethics management system in MOL Group, 2. Regulation of ethics reports management in MOL Group.

Anyone may raise a question to individuals or organizations involved in the ethics management if they feel it is necessary for the interpretation of the Codes or for the ethical assessment of a situation. Details of seeking advice about ethical and lawful behavior can be obtained from the 'Ethics management system in MOL Group' policy (p7, link below).

ETHICS AND GOVERNANCE

<https://molgroup.info/en/sustainability/ethics-and-governance>

SPEAK-UP!

<https://molgroup.info/en/speak-up>

MOL GROUP ETHICS COUNCIL RULES OF PROCEDURE

1. Ethics management system in MOL Group

https://molgroup.info/storage/documents/sustainability/etikai_management_rendszer_en.pdf

2. Regulation of ethics reports management in MOL Group

https://molgroup.info/storage/documents/sustainability/etikai_bejelentések_kezelese_en.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 GOVERNANCE

102-18 Governance structure

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

35-39



More information on the governance structure of the organization, including committees of the highest governance body, as well as the committees responsible for decision-making on economic, environmental, and social topics can be found on the group website. The names and CV of the members of the Executive Board, Board of Directors and Supervisory Board can be found on the group website as well as past and current corporate governance reports inside the MOL Group Integrated Annual Reports.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (from page 35 to 39)

<https://molgroup.info/en/investor-relations/corporate-governance>

<https://molgroup.info/en/about-mol-group/company-overview>

Furthermore, the main corporate governance documents, including articles of association, charters, corporate governance codes and corporate governance declarations can be found in the link below:

<https://molgroup.info/en/about-mol-group/main-governance-documents>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 GOVERNANCE

102-19 Delegating authority

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

More information on MOL Group's process for delegating authority for economic, environmental, and social topics from the highest governance body to senior executives and other employees can be found on our website under the section „SUSTAINABLE DEVELOPMENT GOVERNANCE STRUCTURE“:

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

GOVERNANCE

102-20

Executive-level responsibility for economic, environmental, and social topics

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16



More information on MOL Group appointed executive-level position or positions with responsibility for economic, environmental, and social topics and whether post holders report directly to the highest governance body can be found on the group website:

<https://molgroup.info/en/sustainability/our-commitments>

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/about-mol-group/main-governance-documents>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 GOVERNANCE

102-21 Consulting stakeholders on economic, environmental, and social topics

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

137-138.



11

16



Given the size and socio-economic impact of MOL Group in the CEE region, every year MOL Group organizes roundtable discussions on different economic, environmental, and social topics with relevant stakeholders such as public authorities, NGOs, employees, unions, shareholders and investors etc. More information on the processes for consultation between stakeholders and the highest governance body on economic, environmental, and social topics can be obtained on our website, including how the stakeholder information reaches the executive level:

<https://molgroup.info/en/sustainability/our-commitments> (under section „Professional associations“)

Stakeholder engagement: <https://molgroup.info/en/sustainability/our-commitments> (under section „Stakeholder engagement“)

Community engagement: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (From page 137-138.)

<https://molgroup.info/en/sustainability/reports-and-data>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 GOVERNANCE

102-22 Composition of the highest governance body and its committees

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

36-39



5

16



The name and CV of the members of the highest governance bodies can be found on our website and annual reports. Information on the composition of the highest governance bodies and committees by executive or non-executive; independence; tenure on the governance body; number of each individual's other significant positions and commitments, and the nature of the commitments; gender; membership of under-represented social groups; competencies relating to economic, environmental, and social topics; stakeholder representation can be found on our website:

SUPERVISORY BOARD, BOARD OF DIRECTORS, CHIEF EXECUTIVE COMMITTEE AND MANAGEMENT COMMITTEE

<https://molgroup.info/en/about-mol-group/supervisory-board>

<https://molgroup.info/en/about-mol-group/board-of-directors>

<https://molgroup.info/en/about-mol-group/chief-executives-committee>

<https://molgroup.info/en/about-mol-group/management-committee>

COMPOSITION OF THE HIGHEST GOVERNANCE BODY: available in Data Library under section Corporate Governance

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

ANNUAL REPORT AND MAIN CORPORATE GOVERNANCE DOCUMENTS

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 36-39)

<https://molgroup.info/en/about-mol-group/main-governance-documents>

STAKEHOLDER REPRESENTATION: under section „Stakeholder engagement“, „Shareholders“ and „Employees“: <https://molgroup.info/en/sustainability/our-commitments>

PARTICIPATION RATES AND DISCUSSED AGENDA ITEMS

<https://molgroup.info/en/about-mol-group/board-of-directors>

https://molgroup.info/en/show/altalanos_dokumentumok/board_of_directors_documents/bod_discussed_agenda_items.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

Corporate Governance



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 GOVERNANCE

102-23 Chair of the highest governance body

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



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More information on the chair of the highest governance body and about his/her function within MOL's management and the reasons for this arrangement can be found on our website.

CHARTER OF THE BOARD OF DIRECTORS:

https://molgroup.info/storage/documents/altalanos_dokumentumok/board_of_directors_documents/2022_02_10_bod_proposal_amendment_of_charter_approved_eng.pdf

FUNCTIONS of the BoD: <https://molgroup.info/en/about-mol-group/corporate-governance>

MOL POLICY, INCLUDING ANNUAL GENERAL MEETING INFORMATION

<https://molgroup.info/en/about-mol-group/corporate-governance>

More information on the Chairman-Chief executive officer: <https://molgroup.info/en/about-mol-group/board-of-directors>

<https://molgroup.info/en/about-mol-group/main-governance-documents>

SUPERVISORY BOARD, BOARD OF DIRECTORS

<https://molgroup.info/en/about-mol-group/supervisory-board>

<https://molgroup.info/en/about-mol-group/board-of-directors>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

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SOCIAL

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GOVERNANCE

102-24

Nominating and selecting the highest governance body

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



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More information on the nomination and selection of the highest governance body and about the criteria used for nominating and selecting highest governance body members can be found on our website:

https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/mol_group_policy_on_director_nominations_en.pdf

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/about-mol-group/main-governance-documents>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

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102-25 Conflicts of interest

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



For more information on the topic of processes for the highest governance body to ensure conflicts of interest are avoided and managed and whether conflicts of interest are disclosed to stakeholders please visit the link below:

<https://molgroup.info/en/about-mol-group/main-governance-documents> (In Charter of the Board of Directors, under „Conflict of interest, legal compliance”)

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf (in page 2 under „Avoiding conflicts of interest”)

<https://molgroup.info/en/about-mol-group/board-of-directors> (Information available to public: Board memberships and cross-board memberships)

<https://molgroup.info/en/investor-relations/publications/annual-reports> (Information on the existence of controlling shareholder available on page 48.)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

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SOCIAL

102 GOVERNANCE

102-26 Role of highest governance body in setting purpose, values, and strategy

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

35



For more information on MOL Group highest governance body and senior executive roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental, and social topics please click the links below:

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 purpose, value and mission statements are reviewed by the highest governance body as well.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 35)

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/about-mol-group/main-governance-documents>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



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GRI 200



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GRI 400

GENERAL DISCLOSURES

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102 GOVERNANCE

102-27 Collective knowledge of highest governance body

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



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The Board of Directors (BoD), and the Sustainable Development Committee of the BoD receive a wide range of sustainability related topics, either as reports or proposals during each meeting (typically 6 and 4 meeting per year respectively). MOL Group publishes each year the agenda of each Board of Director Meeting:

The main measures for developing and enhancing the highest governance body's (BoD) collective knowledge of economic, environmental, and social topics are the discussed agenda points at BoD meetings, where each of these main topics are regularly covered.

<https://molgroup.info/en/about-mol-group/board-of-directors>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GRI 300



GRI 400

GENERAL DISCLOSURES

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ECONOMIC

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102 GOVERNANCE

102-28 Evaluating the highest governance body's performance

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Under the Corporate Governance Declaration, the Board of Directors prepares a formal evaluation of its own and its committees' performance on a yearly basis and it continuously conducts self-assessment. .

<https://molgroup.info/en/about-mol-group/corporate-governance> Relevant information under MOL Policy and Relationship with Shareholders section.

https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/molnyrt_articlesinforce_2021_05_20.pdf Relevant information on page 13. under 12.12.

<https://molgroup.info/en/investor-relations/annual-general-meeting>

<https://molgroup.info/en/about-mol-group/main-governance-documents>

No actions taken in response to evaluation of the highest governance body's performance in 2021

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-29 Identifying and managing economic, environmental, and social impacts

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Information on MOL's highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities – including its role in the implementation of due diligence processes, and whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental, and social topics and their impacts, risks, and opportunities can be found on our website, including the SD framework:

<https://molgroup.info/en/sustainability/our-commitments> (Available under section „SUSTAINABLE DEVELOPMENT GOVERNANCE STRUCTURE“)

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/about-mol-group/main-governance-documents> (Available under „Charter of the Board of Directors“)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-30 Effectiveness of risk management processes

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

10



As operators in a high risk industry MOL Group is committed to professionally manage and maintain our risks within acceptable limits as per best industry practice.

The aim of MOL Group Risk Management is to keep the risks of our business within acceptable levels and support the resilience of our operations as well as the sustainability of the company. For this purpose, as an integral part of our corporate governance structure, we have 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.

Regular risk reporting to top management provides oversight on top risks and assurance that updated responses, controls, and appropriate mitigation actions are set and followed. Effectiveness of the risk management system is monitored by the Management Committee, the Chief Executives Committee, the Board of Directors, Supervisory Board and its respective Committees.

MOL Group applies the TCFD framework for its climate change risk management. Climate change related risks are covered both in the long-term and mid-term risk review process. Risk reviews and Climate Change materials to the BoD (or its respective Committee) are based on the TCFD. Climate risk related disclosures are produced in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and consistent with the Greenhouse Gas Protocol.

Additional information can be obtained through the website, as well as through the yearly risk update inside the Integrated Annual Report.

<https://molgroup.info/en/about-mol-group/corporate-governance>

Relevant information on risk management is available here: <https://molgroup.info/en/about-mol-group/corporate-governance> (under Integrated Corporate Risk Management Function section, first four paragraphs)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 10)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-31 Review of economic, environmental, and social topics

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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10, 37



More information about the frequency of the highest governance body's review of economic, environmental, and social topics and their impacts, risks, and opportunities can be found inside the Group's annual reports as well as regularly updated capital markets presentations:

ANNUAL REPORTS

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 10)

INVESTOR PRESENTATIONS:

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SD COMMITTEE RESPONSIBILITIES AND INTERACTION WITH BoD

<https://molgroup.info/en/sustainability/our-commitments>

The meeting frequency of the Board of Directors is available in the Annual Report on page 37: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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SOCIAL

102 GOVERNANCE

102-32 Highest governance body's role in sustainability reporting

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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Information about the highest committee or position that formally reviews and approves MOL Group's sustainability report and ensures that all material topics are covered, as well as MOL Group's approach to reporting, can be obtained in the following links:

The roles and responsibilities of the Sustainable Development Committee are available in the Annual Report on page 37: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUSTAINABLE DEVELOPMENT GOVERNANCE STRUCTURE:
<https://molgroup.info/en/sustainability/our-commitments>

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/sustainability/reports-and-data>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-33 Communicating critical concerns

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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More information on MOL's process for communicating critical concerns to the highest governance body can be found on the website through the following link:

Relevant information available under section Integrated Corporate Risk Management Funcion.

<https://molgroup.info/en/about-mol-group/corporate-governance>

Information regarding the risk review process is available in the Annual Report on page 12.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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102-34 Nature and total number of critical concerns

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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N/A



More information on the nature and total number of critical concerns that were communicated to the highest governance body (agenda items below) and about MOL's mechanisms used to address and resolve critical concerns (second link) can be obtained from the website. The nature of critical concerns raised and discussed at Board level include, but are not limited to corporate governance, financials, treasury, risk management, IT, incentive schemes, strategy, operations and production matters, macro economy, sustainability etc.

DISCUSSED AGENDA ITEMS: <https://molgroup.info/en/about-mol-group/board-of-directors>

<https://molgroup.info/en/about-mol-group/corporate-governance> (Integrated Risk Management section under INTEGRATED CORPORATE RISK MANAGEMENT FUNCTION)

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose discussed agenda items in 2018, 2019, 2020 and 2021. Disclosure is under consideration

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-35 Remuneration policies

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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MOL Group provides a range of information regarding remuneration policies for the highest governance bodies: the Supervisory Board (SB), the Board of Directors (BoD) and executive employees.

- **Supervisory Board Members:** MOL Group discloses all compensation and benefit data, including their monthly fee amounts and other benefits.
- **Board of Directors:** MOL Group discloses all compensation and benefits data, including their fixed yearly remuneration, share allowances, cash allowances and other benefits.
- **Executive employees:** MOL Group discloses a range of policies/data for its executive employees, including percentage mix between base salary, short and long-term incentives, performance-based and equity-based pay, as well as performance criteria objectives, including economic, environmental and social topics.

MOL Group provides yearly updates on changes to remuneration.

Remuneration elements and policy of SB, BoD and CEC members, GCFO and GSOD EVP (executive employees):

The Hungarian Parliament passed the Act LXVII of 2019 on Encouraging Long-Term Shareholder Engagement and amendments of further regulations for harmonization purposes on 2 July, 2019. The regulation implemented 3a-3c of 'Chapter Ia' of Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement. MOL Plc. in order to comply with the regulation, submits to General Meeting for consultative vote the Company's Remuneration Policy of its Board of Directors, Supervisory Board and Executive Employees.

Remuneration policy is available on the following link:

https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/mol_plc_remuneration_policy_en_2021.pdf

Remuneration report (with exact payouts) for BoD and SB members:

Remuneration report about 2021 to be published for the Annual General Meeting.

<https://molgroup.info/en/investor-relations/investor-news>

PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose the following elements as prescribed by the GRI Standards: fixed pay amounts for senior executives, bonus amounts, sign-on bonuses, recruitment incentive payments, termination payments, clawbacks, retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and employees.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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102 GOVERNANCE

102-36 Process for determining remuneration

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



The mandate of the Corporate Governance and Remuneration Committee of the Board of Directors is to review corporate processes, procedures, organisational arrangements, compensation schemes (incl. approving the principles of remuneration), and to make proposals on implementing the best practice; including the list of decision-making and authorities, incentive scheme, well-balanced scheme of performance criteria/requirements, and to elaborate a scheme for development of the top management. More information can be obtained from the CG documents on the website. MOL Group's main remuneration principles are: fairness, transparency and competitiveness. Job systematization and external salary benchmarking provided by external consultant supports the Group in ensuring this. The external consultant providing external salary benchmarks is independent of management, and provides other HR related consulting services.

https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf

<https://molgroup.info/en/about-mol-group/corporate-governance>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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102 GOVERNANCE

102-37 Stakeholders' involvement in remuneration

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



According to internal corporate governance policies, strategic decisions on remuneration are discussed and approved by the relevant bodies within MOL Group: the Board of Directors and the Corporate Governance and Remuneration Committee of the Board.

In respect of the Board of Directors, Supervisory Board members and CEC, GCFO: MOL Plc. in order to comply with the Act LXVII of 2019 on Encouraging Long-Term Shareholder Engagement regulation, submits to General Meeting for consultative vote the Company's Remuneration Policy.

Extraordinary General Meeting supported the latest version of the Remuneration Policy on 23rd December 2021 with 100%. https://molgroup.info/storage/documents/investor_relations/mol_egm_resolutions_20201222_eng.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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102 GOVERNANCE

102-38 Annual total compensation ratio

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose the ratio of the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

However, MOL Group publishes its remuneration policies and reports in compliance with the EU Shareholders Rights Directive and its local adaptations. Accordingly, the recently published remuneration report contains the compensation of MOL Group's executives, available on the following link:

<https://molgroup.info/en/about-mol-group/main-governance-documents>

MOL Group employee wages and salaries data are published in our Annual report (p 68):

<https://molgroup.info/en/investor-relations/publications/annual-reports>

In case of INA, remuneration data are available for INA executives through the following links:

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

INA staff costs and employee benefits data are published in the Annual report (p 57):

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GRI 400

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102-39 Percentage increase in annual total compensation ratio

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose the percentage increase of the ratio of the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

MOL Group publishes its remuneration policies and reports in compliance with the EU Shareholders Rights Directive and its local adaptations. Accordingly, the recently published remuneration report contains the compensation of MOL Group's executives.

Besides, the remuneration report contains the percentage increase in average annual gross earnings per employee and the percentage increase in the average annual gross income per capita of executives employed by MOL Plc. The report is available on the following link:

<https://molgroup.info/en/about-mol-group/main-governance-documents>

In case of INA, historical remuneration data of INA executives are available for each year through the following links:

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

INA staff costs and employee benefits data are published in the Annual report (p 57):

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

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102 GOVERNANCE

102-40 List of stakeholder groups

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16



The list of stakeholder groups engaged by MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/our-commitments> under the section „Stakeholder Engagement”.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A

**GRI 102****GRI 103****GRI 200****GRI 300****GRI 400****GENERAL DISCLOSURES****MANAGEMENT APPROACH****ECONOMIC****ENVIRONMENTAL****SOCIAL****102****STAKEHOLDER ENGAGEMENT****102-41****Collective bargaining agreements**

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

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8

TCFD

Given MOL Group's Commitment to fair employment, the right to exercise freedom of association and collective bargaining is considered crucial by MOL Group. As Hungary has signed the UN Universal Declaration (UNDP) of Human Rights, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy and the OECD Guidelines for Multinational Enterprises, MOL Group considers these codes of conduct to be compulsory guidelines. MOL Group is committed to supporting the ten key principles of the UNDP Global Compact with respect to human rights, labor rights, protection of the environment and fighting corruption. These values have therefore been integrated into our strategy, culture and everyday operations; moreover, MOL Group tries to promote them within its sphere of influence. MOL Group Code of Ethics and Business Conduct is harmonized with the declarations of the above-mentioned agreements, and all MOL Group companies are required to comply with the Code. The Right to Form and Join a Trade Union and the Right to collective Bargaining is in enshrined in the MOL Group Code of Ethics and Business Conduct under section IV.2. Human Rights and section IV.2.5. and Fair Labour Practices:

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

MOL Group is committed to high level social dialogue and MOL Group management is a partner of trade unions and works councils active at members companies employing the majority of the Group's employees. At Group level all employees are represented by the European Works Council (EWC). The EWC ensures the representation of employees at the highest level, exercises its consultation and information rights stipulated by the EWC Directive 2009/38/EC, keeps them informed on an ongoing basis about decisions taken in different countries which are within its competence and about international practices and experiences. More information on the Percentage of total employees covered by collective bargaining agreements can be obtained from the Data Library, while supporting explanations can be obtained from the Annual Report. Overall 91% of the employees are covered by collective agreements, included in the Annual Report 2021 (pp. 134)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 136.)

SUPPORTING DATA

YES

NAME OF INDICATOR

Employees with potential coverage of collective bargaining agreements

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102



GRI 103



GRI 200



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GRI 400

GENERAL DISCLOSURES

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102

STAKEHOLDER ENGAGEMENT

102-42

Identifying and selecting stakeholders

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



MOL Group defines its stakeholders as being groups who affect and/or could be affected by the Group's operations. Being a large multinational company, the majority of engagement processes occur at a local-level. Stakeholders to engage with are selected according to specific local needs and circumstances. MOL Group usually interacts with its stakeholders both proactively or when the stakeholders need information from MOL Group. The group does not exclude any specific stakeholders or stakeholder groups from its engagement activities based on any predefined criteria. One special form of stakeholder engagement is the engagement with policy makers which usually happens in an institutionalized manner through industry associations. Information about identifying and selecting MOL Group stakeholders can be obtained through the Group website:

<https://molgroup.info/en/sustainability/our-commitments> under the section „Stakeholder Engagement“

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



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GENERAL DISCLOSURES

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STAKEHOLDER ENGAGEMENT

102-43

Approach to stakeholder engagement

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



MOL Group defines stakeholders as being groups who affect and/or could be affected by our operations. Given the size and footprint of MOL Group across the CEE, engagement processes occur both at local as well as national level. Stakeholders to engage with are selected according to specific needs and circumstances, and include, but are not limited to, local communities, employees, customers, suppliers, professional associations, public and local authorities, shareholders etc. More information about MOL Group's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process can be found on our website:

<https://molgroup.info/en/sustainability/our-commitments> under section „Stakeholder Engagement“

<https://molgroup.info/en/sustainability/ethics-and-governance> under section „Ethics Communication“ and „SpeakUp!“

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose: 102-43-a - Frequency of engagement by type and by stakeholder group, and the indication whether the engagement was undertaken specifically as part of the reporting process. Disclosure under discussion.

For information on employee engagement surveys, please see 401-1.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

STAKEHOLDER ENGAGEMENT

102-44

Key topics and concerns raised

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

137-138



Information about the topics and concerns that have been raised through stakeholder engagement, including how the organization has responded to those key topics and concerns, including through its reporting; and the stakeholder groups that raised each of the key topics and concerns is available on our website:

<https://molgroup.info/en/sustainability/our-commitments> under section „Stakeholder Engagement“

<https://molgroup.info/en/sustainability/ethics-and-governance> under section „Ethics Communication“ and „SpeakUp!“

Community engagement related information can be found in the Annual Report (page 137-138)

More information about the key topics and concerns that have been raised through stakeholder engagement are available under the following link:

- Details of Ethics cases: <https://molgroup.info/en/sustainability/ethics-and-governance>

The different groups of stakeholders that are involved are Customers, Suppliers, Lawmakers, Rating agencies, Investors, NGOs, Unions, Employees and the Public.

SUPPORTING DATA

N/A

NAME OF INDICATOR

ETHICS

LINK

N/A

EXCEL SHEET

DATA LIBRARY – ETHICS, SECURITY SECTION



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-45

Entities included in the consolidated financial statements

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

69



The list of all entities included in the consolidated financial statements or equivalent documents can be found in the annual report:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> Page 69-71 and 116-117, 141-142.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-46

Defining report content and topic Boundaries

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3, 5-6



TCFD

The explanation of the process for defining the report content and the topic Boundaries and the explanation of how MOL has implemented the Reporting Principles for defining report content is available in previous and current annual reports and on the website through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> Information available on page number 3 and 5-6.

<https://molgroup.info/en/sustainability/reports-and-data>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-47

List of material topics

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

5



TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-49

When developing a corporate sustainability program and reporting framework it is critical to properly choose the topics to focus on. MOL Group conducts a Materiality Assessment to identify the most important sustainability impacts of its operations. MOL Group conducts a materiality assessment to rank and classify relevant topics of the oil and gas industry according to how important they are to external and internal stakeholders of the Company, considering both financial and non-financial relevance. The procedure for the materiality assessment does not aim to exclude any of the relevant topics from the sustainability reporting of MOL Group. The assessment is designed to ensure that the most material topics are described with more details, providing the readers with a deeper insight into the sustainability performance. The result of the assessment are summarized in a materiality matrix which is included in the Management Discussion & Analysis chapter of the Annual Report. The list of the material topics identified in the process for defining report content can be obtained from the annual report :

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 5)

During 2020, MOL Group undertook an in-depth materiality assessment to identify relevant sustainability related issues that are most material for the Group and its external stakeholders. The outcome of the assessment remains valid for the 2021 Integrated Annual Report. The outcome of the assessment is the Materiality Matrix which presents the most material issues facing the Group based on a combination of impact to the Group and importance to external stakeholders. Group level issues considered material are related to climate change and environment (emissions, waste, spills and energy), health and safety (occupational and process), integrity and transparency (ethical behavior, good governance and supply chain), as well as people (employee engagement). These issues are predominantly addressed inside the sustainability report (SR). However, other parts of the Integrated Annual Report also cover material issues, including Management Discussion & Analysis (MDA), Corporate Governance Report (CGR), Financial Statements & Accounts (FSA). And Data Library (DL).

NEW DISCLOSURE IN 2020: Disclosure of material information was expanded towards divisional level for the 2020 Integrated Annual Report, and still valid for 2021 Integrated Annual Report.

Detailed information about the materiality assessment process, can be obtained in the Materiality Assessment inside the 2021 Integrated Annual Report, and in the 2021 MOL Group Materiality Assessment Report available on MOL Group's website.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-48

Restatements of information

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

58



Information about the effect of any restatements of information given in previous reports, and the reasons for such restatements can be found in Annual Reports and the Group Data Library via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 58)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A

**GRI 102****GRI 103****GRI 200****GRI 300****GRI 400****GENERAL DISCLOSURES****MANAGEMENT APPROACH****ECONOMIC****ENVIRONMENTAL****SOCIAL****102****REPORTING PRACTICE****102-49****Changes in reporting**

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3**TCFD****TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-47**

Information on significant changes from previous reporting periods in the list of material topics and topic boundaries can be found on our website and inside the latest annual report. There were significant changes in the list of material topics for the 2020 Integrated Annual Report compared to the 2019 Integrated Annual Report, and those changes are still valid for 2021. See 102-47 for more information.

<https://molgroup.info/en/sustainability/reports-and-data>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3)

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 14th 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 2021.

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 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 Integrated Reporting <IR> Framework 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 report on progress against the ten principles of the United Nations Global Compact (UNGC).

MOL Group has applied the Sustainability Accounting Standards Board (SASB) standards since 2019 as a means to communicate financially material sustainability information. For the 2022 Annual Report, SASB metric codes are no longer limited to Group-level indicators inside the Sustainability Report but have been rolled-out across the entire Integrated Annual Report. The expansion in the use of SASB has predominantly focused on divisional level data and narrative inside the Management Discussion & Analysis following the completion of a materiality assessment in 2020. Given the integrated, and increasingly diversified, nature of MOL Group, SASB metric codes from the following industries (sub-sectors) have been applied: Oil & Gas: Exploration & Production, Oil & Gas: Midstream, and Oil & Gas: Refining & Marketing (Oil & Gas); Chemicals (Resource Transformation); Road Transportation, and Car Rental & Leasing (Transportation), Multiline and Specialty Retailers & Distributors (Consumer Goods Retail); and Electric Utilities & Power Generators (Utilities).

The Group's sustainability report (page x) has been prepared in accordance with the 'comprehensive' option of the Global Reporting Initiative (GRI), including the GRI Sector Disclosures for Oil & Gas. For support in defining the content and selecting which sustainability indicators to cover, MOL Group has applied 4th (and latest) edition of the "Sustainability Reporting Guidance For The Oil And Gas Industry" developed by the International Petroleum Industry Environmental Conservation Association (IPECA), the American Petroleum Institute (API) and the International Association of Oil and Gas Producers (IOGP).

For the calculation and reporting of Greenhouse Gas (GHG) Emissions Scope 1, 2 and 3, MOL Group applied methodologies consistent with the following standards: a) "GHG Protocol Corporate Accounting and Reporting Standard" and "Corporate Value Chain (scope 3) Accounting and Reporting Standard" published by the Greenhouse Gas Protocol, b) "Estimating Petroleum Industry Value Chain (Scope 3) Greenhouse Gas Emissions" by IPECA and API, and c) "Guidance for Accounting and Reporting Corporate GHG Emissions in the Chemical Sector Value Chain" by the World Business Council For Sustainable Development. Data on Scope 1,2,3 GHG emissions meets the disclosure requirements of GRI standard 305-2 and are aligned with the recommendation of the Task Force on Climate-related Financial Disclosures (TCFD). Ernst & Young (EY) has provided limited assurance over Scope 1, 2 and 3 emissions data and reasonable assurance over Scope 1 GHG emissions under ETS.

MOL Group is mandated to disclose material information in its Annual Report. As presented in the materiality matrix (page x), risks and opportunities associated with climate change are a material issue to MOL Group, constituting investment risk to capital markets. As a result, climate related disclosures produced in accordance with the core elements of the TCFD framework are included throughout the Integrated Annual Report. TCFD disclosure overview can be obtained from page x. This ensures that information on climate change is subject to both internal governance and controls, as well as external assurance. Placing climate related disclosures throughout the Integrated Annual Report should allow for the contextualization of this information and connectivity to other material matters.

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

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-50

Reporting period

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3



TCFD

The reporting period for the information provided by MOL Group can be obtained from the Group's website and in the latest annual report (links below), which covers the period from 1st of January 2021 to 31st of December 2021.

<https://molgroup.info/en/sustainability/reports-and-data>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-51

Date of most recent report

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



The most recent annual report is available on our website (link below). The most recent annual report is MOL Group Integrated Annual Report 2021, published on the 28th of April 2022.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-52

Reporting cycle

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3



TCFD

The most recent annual report is available on our website:

<https://molgroup.info/en/sustainability/reports-and-data>

Furthermore, MOL Group Annual report, and annual reports from MOL Group companies INA and Slovnaft can be obtained through the following links:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3)

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

<https://slovnaft.sk/en/about-us/for-investors/financial-reports/annual-reports/>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-53

Contact point for questions regarding the report

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

49



TCFD

MOL's contact point for questions regarding the report or its contents:

Sustainable Development: sd@mol.hu

Investor Relations: investorrelations@mol.hu

Additional contact points can be found in the "Contact Information" Section of the Annual Report and on the link below:

<https://molgroup.info/en/contact-us>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 49.)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102

REPORTING PRACTICE

102-54

Claims of reporting in accordance with the GRI Standards

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3



The Sustainability Report (GRI cross-referenced), the Data Library (GRI cross-referenced), the GRI Compliance Table and the website, which together form MOL Group's sustainability reporting, have been prepared in accordance with the GRI Standards: Comprehensive option. External assurance can be obtained from the MOL Group Integrated Annual Report 2021:

<https://molgroup.info/en/>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 REPORTING PRACTICE

102-55 GRI Content Index

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3, 5-6, 125



MOL Group created this new, highly transparent "GRI Reporting Table", reporting on all 162 indicators separately (including the GRI sector supplement for 'Oil & Gas Sector Disclosures' guidelines). This document represents MOL Group's GRI Content Index. However, in the beginning of this document, a complete GRI Content Index has been created covering for all 162 indicators, providing an overview of whether an indicator is being fully reported, partially reported or omitted. Each indicator in the GRI Content Index has been linked to that specific indicator across the "GRI Reporting Table". The GRI Reporting Table includes: the number of the disclosure, a complete overview where the information can be found, either within this reporting table or in other published materials (annual report, investor presentations etc.) and the reason(s) for omission(s).

GRI CONTENT INDEX: SLIDES 7-10 IN THE GRI REPORTING TABLE

The Annual Report (link below) contains references to the GRI Standards Disclosure number where applicable, and an in-depth explanation on the reasons for creating this reporting table:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3., 5-6., and 125.)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

102 REPORTING PRACTICE

102-56 External assurance

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3,
143



16

TCFD

Information about the description of MOL's policy and current practice with regard to seeking external assurance for the report and detailed information about the external assurance can be found on our website and in last year's annual report:

<https://molgroup.info/en/sustainability/reports-and-data>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3. and 143.)

The BoD approves the assurance service for the sustainability report.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

103

MANAGEMENT APPROACH

103-1

Explanation of the material topic and its boundary

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

3, 5-6, 125, 143



TCFD

When developing a corporate sustainability program and reporting framework it is critical to properly choose the topics to focus on. MOL Group conducts a Materiality Assessment to identify the most important sustainability impacts of its operations. MOL Group conducts a materiality assessments to rank and classify relevant topics of the oil and gas industry according to how important they are to the external and internal stakeholders of the Company, considering both their financial and non-financial relevance. The procedure for the materiality assessment does not aim to exclude any of the relevant topics from the sustainability reporting of MOL Group. The assessment is designed to ensure that the most material topics are described with more details, providing the readers with a deeper insight into the sustainability performance. The result of the assessment is included and explained in the Annual Report and each topic is described in the Sustainability Report inside the Annual Report.

ANNUAL REPORT – MOL GROUP

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (Page 3, 5-6, 126. and 143.)

ANNUAL REPORT - INA

<https://www.ina.hr/en/home/press-center/publications/reporting/>

WEBSITE

<https://molgroup.info/en/sustainability/reports-and-data>

<https://molgroup.info/en/sustainability>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

103

MANAGEMENT APPROACH

103-2

The management approach and its components

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16

TCFD

For each material topic the explanation of how MOL manages the topic, the statement of the purpose of the management approach and the description of the following, if relevant: policies, commitments, goals and targets, responsibilities, resources, grievance mechanisms and specific actions, such as processes, projects, programs and initiatives is available on our website:

<https://molgroup.info/en/about-mol-group/corporate-governance>

<https://molgroup.info/en/sustainability/ethics-and-governance>

<https://molgroup.info/en/about-mol-group/supplier-center>

<https://molgroupcareers.info/en/working-at-mol-group/our-employees/rewarding-employees>

<https://molgroup.info/en/sustainability/climate-change>

<https://molgroup.info/en/sustainability/environment>

<https://molgroup.info/en/sustainability/health-and-safety>

<https://molgroup.info/en/sustainability/human-capital>

<https://molgroup.info/en/sustainability/communities>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

103

MANAGEMENT APPROACH

103-3

Evaluation of the management approach

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



16



MOL Group evaluates the management approach for all material topics through a number of means, including mechanisms for evaluating its effectiveness internal monitoring through Board of Directors, SD Committee and HSE committees, management incentive schemes, external auditing, management systems verifications, external performance ratings, stakeholder feedback and grievance mechanisms. The results of the evaluation of the management approach are typically presented to and discussed by the HSE and SD Committee, any related adjustments to the management approach are made based on changes. In 2021 no adjustments were made in the management approach.

MOL GROUP POLICIES, COMMITTEES, MANAGEMENT, SYSTEMS, OPERATIONS, CONTROL AND ASSURANCE

<https://molgroup.info/en/about-mol-group/corporate-governance> (under section MOL Policy)

<https://molgroup.info/en/sustainability/our-commitments> (under section Sustainable Development Governance Structure, Policy and management System, External Sustainability Indices and Ratings)

<https://molgroup.info/en/sustainability/reports-and-data>

EXTERNAL PERFORMANCE RATINGS (MOL Group Online Capital Markets Day – February, 2021– slide 11)

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

201

ECONOMIC PERFORMANCE

201-1

Direct economic value generated and distributed.

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

14



TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 207-1 / 207-2 / 207-3 / 207-4

MOL Group generates a significant value providing a return for shareholders. MOL is one of the biggest tax-payers in Hungary, Slovakia and Croatia, and distributes economic value to suppliers, employees, public administration and other stakeholders. Overall, MOL Group continually generates value for stakeholders through a range of means. This includes but is not limited to employee wages and benefits, including wages and salaries, social security and other personnel expenses, pension costs and post-employment benefits, and the expense of share-based payments. Payments to capital investors including dividends to shareholders and interest payments made to providers of loans. Payments to local/national governments consisting corporate taxes (e.g. corporate, income, property), VAT and excise duties, mining royalties, other taxes and contributions. Direct economic value generated and distributed in previous years can be found in annual reports and continually updated investor presentations via the following links:

ANNUAL REPORT (MOL GROUP, INA AND SLOVNAFT) AND DATA LIBRARY

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://slovnaft.sk/en/about-us/for-investors/financial-reports/annual-reports/>

<https://www.ina.hr/en/home/investors/financial-reports/annual-financial-reports/>

INVESTOR PRESENTATIONS

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SUPPORTING DATA

YES

NAME OF INDICATOR

Economic

LINK

[DATA LIBRARY](#)

EXCEL SHEET

Data Library



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

201 ECONOMIC PERFORMANCE

201-2 Financial implications and other risks and opportunities due to climate change

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

Pages summarized below



EM-EP-420a.4



13



Given the size of MOL Group, its operating locations, the nature of the oil & gas industry, and the gradual transition to a low-carbon economy, MOL Group faces a wide range of financial implications (both risks and opportunities). MOL Group provides a wealth of information around the financial implications and other risks and opportunities (financial, regulatory, physical etc) for the organization's activities due to climate change and the transition to a low-carbon, circular economy. MOL Group disclosure on the topic includes descriptions and impacts of the risks and/or opportunities associated to climate change (including 2 degree scenario analysis, and the future product portfolio of MOL Group), the financial implications, the methods used to manage these risks or opportunities and the costs of actions taken to manage them. MOL Group does not collect all this information in one single document or presentation, but is fully integrated into most capital markets communication materials (investor presentations) and the integrated annual report.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

<https://molgroup.info/en/investor-relations/publications#nav-quarterly-reports>

<https://molgroup.info/en/sustainability/our-commitments>

MOL Group does monitor and does provide regular updates on how climate related events affect the physical infrastructure of the Group's assets and the consequences of such events. Examples of such disclosure can be obtained under the "Water" and "Spills" sections of the 2020 sustainability report (link above). Since 2021, MOL Group makes climate change related disclosures based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). These disclosures, including risks and opportunities related to climate change can be obtained from the TCFD report inside the Annual Integrated Report. Financial implications of climate change (capex, EBITDA etc) can be obtained from MOL Group capital market releases and investor presentations.

Financial opportunities arising from and the costs (investments, capex) associated the fuel to chemicals transformation of the Group can be obtained from the 2030+ Shape Tomorrow strategy presentation (link below). CAPEX figures on page 49, and EBITDA figures on page 22. The fuel to chemicals transformation is the key aspect of MOL Group's transition to a low-carbon circular economy.

https://molgroup.info/storage/documents/publications/investor_presentations/2021/mol_cmd_presentations_20210224.pdf

To summarize the related annual report pages:

- i. a description of the risk or opportunity and its classification as either physical, regulatory, or other. Page 10-12.
- ii. a description of the impact associated with the risk or opportunity. Page 12-13.
- iii. the financial implications of the risk or opportunity before action is taken. Page 17-18.
- iv. the methods used to manage the risk or opportunity. Page 12 and 40.
- v. the costs of actions taken to manage the risk or opportunity. Page 17-18.

Partial reporting explanation: The costs of actions taken to manage the risk or opportunity (related to climate change) not available at publication, discussion ongoing

SUPPORTING DATA N/A

NAME OF INDICATOR N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

201

ECONOMIC PERFORMANCE

201-3

Defined benefit plan obligations and other retirement plans

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

90



EM-EP-420a.4



8

TCFD

MOL Group being present in dozens of countries, thus has benefit principles set which are implemented according to local legislation. Group Life and accident insurance is centrally covering the total 24,000 employee population, and on bigger markets (Hungary, Slovakia, and Croatia) health benefits and/or insurance is provided according to market practices. No corporate pension fund is in place, though in some countries employer can contribute to the employees' pension savings. Information on MOL Group defined pension obligations and other retirement plans can be obtained from the Group's integrated annual report., under two sections: "Provision for Long-term employee benefits", and section "16. Provisions" (Annual Report page 88.)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose as data is not available at current stage for the following indicators:

201-3-d: Percentage of salary contributed by employee or employer.

201-3-e: Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional, or country-based schemes, or those with financial impact

Discussion ongoing on disclosure.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

201

ECONOMIC PERFORMANCE

201-4

Financial assistance received from government

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

MOL Group may receive from time to time financial assistance from governments in jurisdictions in which it operates. MOL Group operates with full transparency, and total financial assistance received from governments can be obtained from the Data Library in the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

The ownership structure is available here: <https://molgroup.info/en/investor-relations/mol-shares>

PARTIAL REPORTING EXPLANATION:

MOL Group disclosed total financial assistance received from governments, but does not disclose the breakdown of received financial assistance by country as prescribed by the GRI standards.

SUPPORTING DATA

YES

NAME OF INDICATOR

Financial assistance received from government

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ETHICS-SECURITY-ECONOMIC



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

202

MARKET PRESENCE

202-1

Ratios of standard entry level wage by gender compared to local minimum wage

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



5

8

10

TCFD

MOL Group reward schemes have been designed to reinforce a merit-based culture to ensure a continuous increase in performance and results. MOL Group aligns and harmonizes reward across the Group in companies with similar business profiles, by applying tailored remuneration strategies, taking into consideration local benchmarks and the company's market position. MOL Group's reward strategy is built on the international Total Remuneration approach, which includes major compensation elements including the Annual Base Salary, Short- and Long-Term Incentives and Benefits. MOL Group implements strict guidelines to ensure equal employee compensation regardless of gender, age and nationality. Group-level compensation policies are transparent and are published in group and local regulations. Company-level rules are also defined by Collective Agreements of companies.

MOL Group operates with full transparency concerning Ratio of corporate minimum wage to local minimum wage at significant (more than 100 employee) operating locations. The information can be obtained from the Data Library in the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Partial disclosure explanation:

- MOL does not disclose indicator 202-1/a ,When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage' by gender, but by geographic location
- Indicators 202-1/b and 202-1/c are not disclosed fully, only in the above mentioned structures

SUPPORTING DATA

YES

NAME OF INDICATOR

Ratio of corporate minimum wage to local minimum wage at significant operating locations

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

202

MARKET PRESENCE

202-2

Proportion of senior management hired from the local community

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

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8 10



Across MOL Group Upstream International operating companies, MOL Group follows local regulatory requirements and Production Sharing Agreement stipulations (where applicable) to ensure local content and maintain the expat quota – thus the majority of employees at E&P International Operating Companies are local nationals. MOL focuses on developing its local technical and office employees and ensures expat knowledge transfer (through mentoring, tutoring, internal training, etc.). The number of local senior executives and local managers at its International Upstream can be obtained from the Data Library. MOL CEE operations (INA, Slovnaft, and MOL) are typically staffed and managed by local workforce.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 139)

Management teams for the two major MOL Group subsidiaries can be obtained in the following links:

<https://www.ina.hr/en/home/about-ina/company-profile/corporate-governance/>

<https://slovnaft.sk/en/about-us/our-company/corporate-governance/board-of-directors/>

REASON FOR OMISSION: MOL Group does not disclose 202-2-b (definition used for 'senior management'), 202-2-c (organization's geographical definition on 'local') and 202-2-d (definition used for 'significant locations of operation')

SUPPORTING DATA

YES

NAME OF INDICATOR

LOCAL MANAGERS - OPERATED INTERNATIONAL UPSTREAM (EX-CEE) LOCATIONS

LINK

[DATA LIBRARY](#)

EXCEL SHEET

COMMUNITIES



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

203

INDIRECT ECONOMIC IMPACTS

203-1

Infrastructure investments and services supported

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

139



TCFD

In the main countries where MOL Group has Upstream and midstream operations, the most significant indirect impact of MOL Group on the economies of these countries is through the energy it supplies. Another area in which the company can have a significant positive impact on the societies of host countries as a result of the group's operations is by improving access to infrastructure and energy. The development of infrastructure and improvements in access to energy can be directly related to the group's operations, or can occur based on contractual or other commitments.

In Pakistan several communities still lack access to clean drinking water. As part of its social investment program in the last years MOL Pakistan has spent more than USD 800 thousand in executing effective water supply schemes in the most deprived districts of Khyber Pakhtunkhwa including Karak, Hangu, Bannu and Kohat. Previous examples of MOL Group's indirect economic impact include the non-voluntary financial support given by MOL Pakistan for the construction of the Khushal Garh bridge, which improves safety and connectivity between the main provinces of Khyber Pakhtunkhwa and Punjab in Pakistan.

Information about the extent of development of significant infrastructure investments and services supported; the current or expected impacts on communities and local economies, including positive and negative impacts where relevant and whether these investments and services are commercial, in-kind, or pro bono engagements can be found on our website, the Data Library, and in previous and current annual reports under the Communities section:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (Annual report page 139., Data Library – Communities, Donations)

<https://molgroup.info/en/sustainability/case-studies>

SUPPORTING DATA

YES

NAME OF INDICATOR

Social investments - donations, in-kind and leverage

LINK

[DATA LIBRARY](#)

EXCEL SHEET

COMMUNITIES



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

203

INDIRECT ECONOMIC IMPACTS

203-2

Significant indirect economic impacts

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

137,
138



8 10 11

TCFD

Examples of significant identified indirect economic impacts of MOL, including positive and negative impacts and information on the significance of the indirect economic impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas are available on our website:

<https://molgroup.info/en/sustainability/case-studies>

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 137-138.)

Partial information explanation:

Indicator 203-2/b not reported as the information is not available at publication

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

204

PROCUREMENT PRACTICES

204-1

Proportion of spending on local suppliers

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



11 12

TCFD

MOL Group procurement is a functional organization that helps MOL Group to achieve its business objectives. It is managing a comprehensive supplier base worldwide, including international and local suppliers, as well based on the subject and scope of the procurement procedure. During the creation of procurement category strategy and regulated sourcing procedure, suppliers to be involved are predefined together by procurement and business units. MOL Group contracts with local suppliers whenever it is beneficial, which can be a way of establishing a positive relationship with local communities. Local suppliers are promoted since logistics related cost are always taken into consideration during the procurement process in case of services related to MOL Group locations worldwide, local existence of given international supplies is also considered.

MOL Group processes are compliant with ISO 50001:2011 requirements (energy management system), these are also applied when dealing with procurement of production materials/assets. Total cost of ownership (TCO, cost during the life-cycle) is part of the evaluation framework, where energy effective solutions are promoted. The origin of the given asset/material is also taken in account during the supplier selection procedure. MOL Group is only concluding contracts with suppliers that have been pre-screened from financial, legal and sustainability, and pre-qualified from HSE aspect. MOL Group is committed to be business partner of suppliers with ethical attitude, thus potential suppliers are also subject of ethical pre-screening (i.e. Illicit employment practices, money laundering activities, terrorist financing, bribery, corruption etc. are reasons for disqualifying). Sourcing procedures are managed and controlled via a group-wide used system, which ensures transparency and fair competition of such supplier base. Official communication channels are always set up to enable traceability. Suppliers are also subject to regular post-evaluation, and the results serve a basis to the future cooperation between the parties. MOL Group has built up strong strategic relationship in defined procurement areas ensuring the stability and long-term cooperation.

During 2021, the total value of Non-HC spend between MOL Group and locally registered businesses is EUR 3312 mn (75%).

In 2021 the reporting methodology has been changed, because during the year Procurement has successfully finished building up a new group level quarterly reporting process which made spend reporting with continuous data quality improvement possible. As a result of that process, *Proportion of spending on local suppliers* data provision became possible based on Group level Procurement spend report.

MOL Group discloses the number/ratio of local suppliers in the Data Library and previous annual reports. The information can be obtained via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Definition:

204-1-b The organization's geographical definition on 'local'; The supplier is reported as local, if its headquarters is located in the same country as the ordering MOL Group Company.

204-1-c Definition used for 'significant locations of operation'; This definition is not applicable for Local supplier reporting with the current data content and reporting methodology.

SUPPORTING DATA

YES

NAME OF INDICATOR

Number of local suppliers / Ratio of local suppliers / Ratio of local suppliers by contracted value

LINK

[DATA LIBRARY](#)

EXCEL SHEET

COMMUNITIES



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

205

ANTI-CORRUPTION

205-1

Operations assessed for risks related to corruption

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-510a.2



16



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205-2 AND 205-3

MOL Group anti-corruption practices include the following:

- anti-corruption standards are described in our Group Code of Ethics and Business Conduct. (covers all Group operations/companies)
- procedures to be followed in case of assumed fraudulent co-operation, unfair market behaviour are defined in the Procurement Handbook
- the internal fraud risk assessments and fraud related investigations are conducted by Group Security and its local security organizations according to the annual fraud risk assessment plan approved by senior management.
- the anti-fraud and internal investigation framework are regulated by the Group Security Area Book (published in 2019), Process Description of Annual Fraud Risk Assessment Plan (published in 2021) and Process Description of Managing internal investigations and authority requests (published in 2021)
- ethics-related e-learning materials dealing, among other things, with anti-corruption issues are mandatory for all the employees having access to the intranet of MOL Group.
- annual managerial presentation is obligatory about the ethical norms for all employees
- all country 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.
- An ethical reporting system supports the handling of internal and external grievances. The MOL Group EC Rules of Procedure defines the rules applicable to ethical investigation procedures. MOL Group business partners shall commit themselves to conducting business free of any and all forms of corruption and fraud, including the rejection of propositions or attempts made in favour or on behalf of their employees or organizations and aiming at payment of unfair amounts. We are striving to make the Business Partner Code of Ethics part of every contract. 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.

<https://molgroup.info/en/sustainability/ethics-and-governance>

MOL Group anti-corruption is process driven, irrespective of operations/companies. Following an internal review, possible risk assessments are discussed, and then a number of proposed processes with fraud risk are selected. During 2021, thirteen different processes were selected to undergo fraud risk assessments.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose the percentage coverage in term of processes as the number would be irrelevant, nor 205-1-b (List of risks).

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

205

ANTI-CORRUPTION

205-2

Communication and training about anti-corruption policies and procedures

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-510a.2



16



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205-1 AND 205-3

For the purpose of this reporting "anti-competitive" is a general term referring to anti-competitive behaviour, including anti-trust and monopoly practices

The foundation of MOL Group's ethics management system continues to be the Code of Ethics and Business Conduct (CoEBC). The CoEBC (first link below) contains a section titled "Anti-corruption And Anti-fraud" (section IV.4). As of 2018, all Group employees received and signed reception of the CoEBC (i.e. MOL Group's anti-corruption policies and procedures have been communicated to all employees, regardless of employee category or region, including governance body members). In line with internal rules, every new employee hired by MOL Group had to be trained about CoEBC and required to pass compulsory training. MOL Group places special emphasis on disseminating the values and norms of the CoEBC through ethics-related trainings. Training of the CoEBC addressing the topics covered by the Code (including anti-corruption) was successfully completed by employees of MOL Group (all employees must pass training on the CoEBC, regardless of category or region). Supportive narrative can be obtained from the annual report.

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

The MOL Business Partner Code of Ethics (BPCE) is applicable to all MOL Group business partners (defined in the BPCE as suppliers, contractors, service providers, customers, transaction partners, advisors, sponsorship or corporate giving co-operation and other contracted partners of MOL Group companies). The BPCE contains an Anti-Corruption section, and has been communicated to all business partners (all new suppliers must sign and act according to both the Code of Ethics and Business Conduct as well as Business Partner Code Of Ethics), and is available to any other persons or organizations on the link below. Supportive narrative, including BPCE contract coverage can be obtained from the Annual Report.

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

In 2021, communication and training on ethics continued to be extended to governance body members, as the subject of ethics was integrated into the yearly training package for members of the Board of Directors and Supervisory Board.

For the purpose of this reporting "anti-competitive" is a general term referring to anti-competitive behaviour, including anti-trust and monopoly practices

REASONS FOR OMISSION: GRI standard required data not available at the moment, disclosure under discussion

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

205

ANTI-CORRUPTION

205-3

Confirmed incidents of corruption and actions taken

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-510a.2



16

TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205-1 AND 205-2

MOL discloses in the Data Library the number of corruption related ethics reports. During 2021, 7 bribery and corruption allegations were reported from which none was proven. In gifts or hospitality category there were no reports through the whistle-blower reporting system of MOL Group (including INA Group as well). During 2021, no employees were dismissed or disciplined for corruption, and there were no incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. During 2021, no public (external) legal cases regarding corruption were brought against the organization or its employees, although for the latter, one proceeding is still ongoing in Croatia.

MOL Group does not disclose actions taken in cases of incident of corruption given the confidentiality of the topic.

SUPPORTING DATA

YES

NAME OF INDICATOR

Topics of ethics complaints (whistle-blower reports) - Total

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ETHICS-SECURITY-ECONOMIC



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

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206

ANTI COMPETITIVE BEHAVIOUR

206-1

Legal actions for anti-competitive behavior, anti-trust, and monopoly practices

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-520a.1



16



MOL Group has a policy aimed at ensuring compliance with, and preventing infringement of, competition law. MOL Group provides training courses (e-learning) to all staff on competition law and behavior. In Q3 2020, MOL Group was notified by Slovenian competition authority that it had opened a formal investigation related to potential anti-competitive practices regarding LPG sales in Slovenia. The investigation carried into 2021 and is currently ongoing at the time of publication. During 2021, MOL Group was not subject to any fines or settlements related to 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 2021.

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, behavioral remedies etc.). Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing trainings to increase awareness.

More information can be found in the Sustainability Report: <https://molgroup.info/en/sustainability/reports-and-data>

*For the purpose of this reporting "anti-competitive" is a general term referring to anti-competitive behaviour, anti-trust and monopoly practices.

SUPPORTING DATA

YES

NAME OF INDICATOR

Ongoing (external) investigations related to anti-competitive practices, Fines or settlements related to anti-competitive business practices

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ETHICS-SECURITY-ECONOMIC



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

207 TAX

207-1 Approach to tax

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201-1

207-1-a. i.

MOL Group actively complies with all external tax regulations and disclosure requirements in all countries in which it operates, this is also stated in its tax strategy. MOL Group's tax policy is designed to ensure compliance with all relevant tax regulations (with regard to both the spirit and the letter of those regulations) in each country in which MOL Group operates. The tax strategy of MOL Group is not publicly available

207-1-a. ii.-iii.

The Group Head of Tax and Reporting formulates and owns the MOL Group approach to tax governance. This is governed by internal regulations at both a group and local level, which are reviewed on a regular basis. The Group Tax department together with local finance staff in the countries in which MOL Group operates ensure effective internal oversight of the tax process of MOL Group. Tax strategy is reviewed on an annual basis

207-1-a. iv.

MOL Group is engaged in sustainable development, this is also part of its ESG strategy. MOL Group's engagement in sustainable development is present in every segments of its activity including tax.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

207 TAX

207-2 Tax governance, control and risk management

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201-1

207-2-a. i.-ii.

GOVERNANCE OF TAX: The Group Head of Tax and Reporting formulates and owns the MOL Group approach to tax governance. This is governed by internal regulations at both a group and local level, which are reviewed on a regular basis. The Group Tax department together with local finance staff in the countries in which MOL Group operates ensure effective internal oversight of the tax process of MOL Group. The tax strategy of MOL Group is not publicly available

207-2-a. iii.

TAX RISK MANAGEMENT: MOL Group acknowledges that non-compliance with tax laws could expose MOL Group to fines, penalties, reputational damage, damage to relationships with a broad spectrum of key stakeholders and restriction of customs and excise privileges.

Tax risk is ideally managed by the prevention of unnecessary disputes with the tax authority. Tax risks in MOL Group are identified, assessed, managed and monitored via an internal tax risk management process. This process provides an appropriate framework to manage the compliance and transactional tax risks to which MOL Group may be exposed. There is no defined level of tax risk that MOL Group is prepared to accept. Professional judgement and expertise will be employed in order to determine how any identified risk should be managed. In the event of uncertainty:

- ▶Written advice may be obtained from external tax advisers to support the internal decision making process; and/or
- ▶MOL Group is willing to communicate directly with the appropriate tax authority and/or governmental representatives to obtain appropriate ruling(s).

207-2-a. iv.

MOL Group applies the arm's length transfer pricing principle to all intra-group transactions.

207-2-b

MOL Group monitors and reviews its operations to adjust its tax procedures when necessary to be compliant with any changes to the applicable tax rules and regulations, including transfer pricing guidelines. MOL Group Compliance & Ethics department operates a corporate grievance mechanism called "SPEAK-UP! " (first link below) under the coordination of the Group Ethics Officer and according to the Ethics Council Rules of Procedure(second link below) as questions are answered, complaints are investigated and the Ethics Council assesses the raised issues. During 2019, the number of topics covered for advice and concerns about ethics was expanded. The reporting concerns about unethical or unlawful behavior and the organization's integrity in relation to tax can be also reported in the framework of this.

SPEAK-UP!

<https://molgroup.info/en/speak-up>

MOL GROUP ETHICS COUNCIL RULES OF PROCEDURE

https://molgroup.info/storage/documents/sustainability/ec_rules_of_procedure.pdf

REASON FOR PARTIAL REPORTING: MOL Group does not disclose 207-2-c, as assurance process for disclosures on tax is part of the general assurance process.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

207 TAX

207-3 Stakeholder engagement and management concerns related to tax

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201-1

207-3-a. i.

MOL Group is committed to a transparent, constructive and trustful relationship with the tax authorities and other stakeholders in the jurisdictions in which it operates. The tax strategy of MOL Group is not publicly available

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose 207-3-a-ii, 207-3-a-iii as these are not applicable at its case.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

207

TAX

207-4

Country-by-country reporting

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201-1

REASON FOR OMISSION: MOL Group disclosed the CBC report to the Hungarian Tax Authority which provides the concerned states with the report in the framework of automatic exchange of information. Discussion on tax strategy disclosure is ongoing

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

OG

RESERVES

OG-1

Volume and type of estimated proved reserves and production

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-210a.1/ EM-EP-210a.2/ EM-EP-510a.1



OG-1-2.1 MOL Group discloses the volume and type of estimated proved reserves, estimated proved and probable reserves, and production. Detailed information can be obtained in the Annual Report and Data Library. Furthermore, MOL Group provides each quarter Upstream production related figures through its capital markets communication materials. All three reports can be obtained through the links below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

https://molgroup.info/en/show/publications/annual_reports/2020/data_library_2016_2020.xlsx

OG-1-2.2 & 2.5 The basis of MOL Group reserves and resources process and calculation is the SPE-PRMS, last updated 2018. The basis of the SPE-PRMS is the Petroleum Resources Classification Framework. Publicly accessible through https://www.spe.org/industry/docs/PRMS_Guidelines_Nov2011.pdf and <https://www.spe.org/en/industry/reserves/>

OG-1-2.3 & 2.4 Exploration and production techniques such as drilling horizontal wells and reservoir enhancement have revolutionized the energy industry. MOL Group realizes the sensitivity of these issues and has defined a set of environmental standards for performing limited enhanced recovery methods to enhance the production of conventional fields. These requirements encompass stakeholder concerns, water/land-use and protection, well-integrity, the use of chemicals, and other risks which are anticipated from specific risk studies. MOL Group has currently no unconventional exploration or development project in progress. Regarding enhanced recovery, it is ongoing currently in Hungary, and at INA with CO₂ injection at two fields. During the entire lifecycle of the activities, all risks are managed. In 2021 and only in Croatia, over 0.2 billion cubic meters of CO₂ was injected into fields by the EOR projects ongoing, more than 1.3 billion cubic meters since its start, the majority of which is permanently stored.

A more detailed breakdown on production and reserves data is available on page 42 in MOL Group's Investor Presentation about 2021 results, publicly accessible through the following link:

https://molgroup.info/storage/documents/publications/investor_presentations/2022/mol_ir_presentation_february_2022_updated_v2.pdf

MOL Group does not have any LNG liquefaction capacity. MOL Group does not have any offshore Arctic positions or positions in water depths greater than 200 m.

UNCONVENTIONAL EXPLORATION AND PRODUCTION: MOL Group is currently not engaged in the exploration of unconventional resources and has never been involved in the past in the development or production of oil and/or gas from such position. MOL Group's 1P and 2P reserves do not contain unconventional derived oil and/or gas. No revenues were generated from the sale of oil or gas products (final and intermediate) that were extracted from unconventional developments. This includes all upstream oil & gas business, and of all fossil fuel operations (upstream and downstream).

OIL SANDS: MOL Group is not engaged in the exploration, development or production of oil sands. MOL Group's 1P and 2P reserves do not contain oil sands. No revenues were generated from the sale of oil products (final and intermediate) that are extracted from oil sands. This includes all upstream oil & gas business, and of all fossil fuel operations (upstream and downstream).

CARBON CAPTURE, UTILIZATION AND STORAGE (CCUS): MOL Group has ongoing projects in Croatia and Hungary where CO₂ is permanently stored in suitable geologic formations. MOL complies with all regulatory requirements and has adopted internationally recognized safety standards for CO₂ transport and storage.

SUPPORTING DATA

YES

NAME OF INDICATOR

Proved Reserves (1P) / Proved + Probable Reserves (2P)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

E&P - GROSS RESERVES (SPE RULES)



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

301

MATERIALS

301-1

Materials used by weight or volume

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



8

12

TCFD

NOT APPLICABLE

MOL Group's primary sold products consist of extracted oil, gas and condensate gas from upstream operations, as well as fuel from retail operations. As a result, MOL Group does not track materials used by neither weight nor volume.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

301

MATERIALS

301-2

Recycled input materials used

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

126



CG-MR-410a.3



8

12

TCFD

NOT APPLICABLE

MOL Group's primary sold products consist of extracted oil, gas and condensate gas from upstream operations, as well as fuel from retail operations. As a result, recycled input materials used to manufacture the organization's primary products and services is not applicable to MOL Group.

However, recycled input materials are used by MOL Group in some of the following non-primary product lines:

MOL Group produces and sells rubber modified bitumen, a binder material used for asphalt mixture production and road construction, which is produced from bitumen and crumb rubber. Rubber crumbs are drawn from waste scrap tires. Used lubricants (not a primary product) are typically recycled in bitumen production processes following collection (GRI 301-3). More information can be obtained via the following link:

<https://molgroup.info/en/media-centre/press-releases/mol-is-building-a-new-rubber-bitumen-plant-in-zalaegerszeg-hungary>

In 2012, MOL-LUB introduced recycled PET packaging for its autochemical products (coolants, screenwasher fluids). Cardboard boxes are made partly from recycled paper.

<https://molgroup.info/en/sustainability/environment>

For polymers products as part of the Group's petrochemical operations, no recycled input materials is currently used. However, MOL Group, as part of its 2030 transformational strategy updates yearly of its future product portfolio and any developments concerning the use of recycled materials for future product lines. More information can be obtained in the Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (p126)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

301

MATERIALS

301-3

Reclaimed products and their packaging materials

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



CG-MR-410a.3



8

12

TCFD

MOL Group continuously seeks to decrease its environmental footprint by reducing the amount of waste generated and developing treatment, recycling and recovery solutions. According to MOL Group's HSE Management System, a waste management programme is to be placed at each site, and among other requirements, it should contain methods for reuse, recycle and recovery of various materials. More information can be obtained from the link below:

<https://molgroup.info/en/sustainability/our-commitments>

MOL Group facilitates collection of used household cooking oil across its service stations.

<https://mol.hu/hu/molrol/mediaszoba/704-kisutottuk-ide-vele-hozza-a-hasznalt-sutoolajat-a-mol-benzinkutakra>

Lubricants and Autochemicals are produced and sold by MOL Group's lubricant subsidiaries. These companies pay special attention to product stewardship as they are capable of recollecting and recycling a significant percentage of lubricant-related waste which is produced by industrial (B2B) and residential customers (B2C). MOL-LUB recollects used lubricant oil as well as their packages from its customers in Hungary. Links below:

B2B Direct delivery <https://mol.hu/hu/kenoanyag-es-autoapolas/ipar/szolgaltatasaink/faradt-olaj-es-egyeb-veszelyes-hulladek-visszagujites-ipar/>

B2C Recollecting on 68 service stations <https://mol.hu/hu/kenoanyag-es-autoapolas/autosok/szolgaltatasaink/faradt-olaj-atvetel>

The amount of waste lubricants and packaging materials recollecting from customers can be obtained from the Data Library in the link below. The figures cover operations in Hungary (MOL-LUB), Croatia (Maziva) and Slovakia (Slovnaft) where the recollection of lubricants is performed or coordinated directly by MOL Group.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose the percentage of reclaimed products and their packaging material for each product category.

SUPPORTING DATA

YES

NAME OF INDICATOR

Recollected lubricant and lubricant packaging

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

302

ENERGY

302-1

Energy consumption within the organization

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

126



RT-CH-130a.1



7

9

12

13

TCFD

302-1 c, 302-1 e

As an integrated oil and gas company, MOL Group has a significant energy consumption. Transparency concerning energy consumption is a high priority. Information on MOL Group's own energy consumption can be obtained through the Data Library or the Annual Reports through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 126.)

MOL Group does not use coal/lignite as a source of fuel/energy for any of its Downstream sites (Downstream makes up 87% of the Group's Greenhouse Gas Emissions Scope 1). Downstream sites include three refineries, petrochemical facilities and power generation sites.

302-1 a, 302-1 b, 302-1 c/ii., iii., 302-1 d, 302-1 f, 302-1 g

PARTIAL REPORTING EXPLANATION:

MOL Group discloses a wide range of energy related data. However, MOL Group does monitor electricity, heating, cooling, and steam sold, but does not disclose it as prescribed per GRI Standards. Furthermore, MOL Group does not reference to points a (Total fuel consumption from non-renewable sources), b (Total fuel consumption from renewable sources), f. (Standards, methodologies, assumptions, and/or calculation tools used) and g. (Source of the conversion factors used). MOL Group continuously reviews the Group's sustainability reporting in comparison with existing and emerging reporting frameworks, whilst listening to capital markets and stakeholder feedback.. Currently the information is unavailable, disclosure of this data is under consideration.

SUPPORTING DATA

YES

NAME OF INDICATOR

Direct energy consumption / Indirect energy consumption / Energy consumption - by business

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

302

ENERGY

302-2

Energy consumption outside of the organization

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



RT-CH-130a.1



7

9

13

TCFD

EXPLANATION FOR OMISSION: MOL Group does not disclose energy consumption outside of the organization, since comprehensive information is unavailable. However, as an integrated oil and gas company, MOL Group has a significant energy consumption. Transparency concerning energy consumption is a high priority. Information on MOL Group's energy consumption can be obtained through the Data Library or the Annual Reports through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

302

ENERGY

302-3

Energy intensity

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



RT-CH-130a.1



7

9

12

13

TCFD

302-3 a, 302-3 b, 302-3 c, 302-3 d

As an integrated oil and gas company, MOL Group has a significant energy consumption. Transparency concerning energy consumption is a high priority.

Information on the energy intensity inside the organization can be obtained through the Data Library (types of energy included in the calculation include steam, electricity and fuel; the calculation uses energy consumption inside the organization) or the Annual Reports via the below link.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Energy Consumption – by business (production weighted)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

302

ENERGY

302-4

Reduction of energy consumption

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

128



RT-CH-130a.1



7

9

12

13

TCFD

302-a

Information about the amount and nature of reductions in energy consumption achieved, including financial savings, can be obtained through current annual reports. Furthermore, MOL Group updates on energy saving initiatives and results regularly via capital market related information and on the website. Both can be obtained via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

<https://molgroup.info/en/sustainability/climate-change>

302-4 b, 302-4 c, 302-4 d

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose: 302-4-b (Types of energy included in the reductions), 302-4-c (Basis for calculating reductions) and 302-4-d (Standards, methodologies, assumptions used). MOL Group discloses energy reduction in CO2 equivalents, and not in Gigajoules as prescribed by the GRI Standards. Disclosure of these is under consideration.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

302

ENERGY

302-5

Reductions in energy requirements of products and services

REPORTING

OMISSION

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

126



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12

13



Information concerning reductions in energy requirements of sold products and services, and the amount of reductions in energy consumption achieved can be obtained inside the Annual Report under the MD&A chapter (section Mobility) via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

EXPLANATION FOR OMISSION: MOL does not disclose 302-5-a (Reduction in energy requirements of sold products and services achieved), 302-5-b (Basis for calculating reductions) and 302-5-c (Standards, methodologies, assumptions used) due to the fact that information is unavailable currently.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

ENERGY

OG-2

Total Amount Invested in Renewable Energy

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

127



EM-EP-420a.3/RT-CH-130a.1



7

9

13

TCFD

MOL Group provides yearly supporting narrative and amounts invested and yearly updates on its renewable projects in the Annual Report (MD&A section). In 2021, there was not any investments in renewables. However, we are planning future investments and we will further develop our renewable portfolio in 2022.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

For additional information concerning renewable energy at MOL Group:

<https://molgroup.info/en/sustainability/climate-change>

GROUP LEVEL CAPEX (slide 5) https://molgroup.info/storage/documents/publications/quarterly_reports/2021/q4_2021_results_call.pdf

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose the capital expenditures in biofuel nor the total amount invested by type of technology

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



ok GRI 400

SOCIAL

303 WATER AND EFFLUENTS

303-1 Interactions with water as a shared resource

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

129-130



EM-EP-140a.1/ RT-CH-140a.3



6

12

13

14

15



303-1a The oil and gas industry, consumes large amounts of water and the most water intensives are the refining and petrochemical technologies and also produces large amounts of water due to the extraction of oil and gas. Therefore MOL Group is constantly focusing on finding ways to improve the handling methods of these large quantities of water. Issues related to water management are becoming increasingly critical in the lives of societies and companies, and require a permanent change in operations. Water management principles are similar to those followed in waste management; critical issues include: reducing fresh water intake, reuse and recycling of water and responsible water emissions (reductions and impact assessments). MOL Group is committed to reducing it's environmental footprint, protect natural values and support international efforts that addresses climate-change related risks.

<https://molgroup.info/en/sustainability/environment>

303-1b The majority of MOL Group operations are situated in the EU region, and therefore water management practices are driven by the EU environmental acquis. However, via the HSE Management System, (link below), MOL Group has additionally set up requirements for water savings and water protection.

<https://molgroup.info/en/sustainability/our-commitments>

303-1c MOL Group's EU operations are not situated in water stressed areas. However, MOL Group has taken actions to assess the situation in more depth within the Groups international (ex-EU) operations which, according to external studies (such as water availability maps from the World Resource Institute), are situated in potentially water-scarce areas in Pakistan. As a result, a detailed hydrological study of the Teri water basin (Pakistan) was carried out with the aim of assessing available water resources and the potential impact of our operations. The study concluded that, due to local circumstances, MOL Group operations are not disturbing the water balance, and that water resources are satisfying the needs of the surrounding six villages and of MOL Pakistan. However, as a precautionary measure MOL Group has taken steps to protect water sources. These measures include periodical analysis of the quality of ground water through monitoring wells, ongoing implementation of the Water Conservation Action Plan developed in 2014, and the use of treated effluent water for gardening purposes.

MOL Group provides a range of water related data and supporting narrative that can be obtained from the Annual Report and Data Library via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

303-1d Water management is a key part of the new internal Group HSE strategy (what is not publicly available), with the purpose to reduce the negative environmental impact on the surface and subsurface water bodies. Groundwater monitoring systems are operated in major sites in order to monitor the impact of the activity onto the soil and groundwater quality and to manage properly existing groundwater pollution. MOL Group updates the company's long-term strategy, that is now fully integrated with a new sustainability strategy — aligned with the European Green Deal ambitions — and complemented with a vision beyond 2030.

SUPPORTING DATA

YES

NAME OF INDICATOR

SEVERAL

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



ok

GRI 400

SOCIAL

303

WATER AND EFFLUENTS

303-2

Management of water discharge-related impacts

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

125



EM-EP-140a.2/ RT-CH-140a.1



6

12

13

14

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TCFD

303-2 a

The oil and gas industry, consumes large amounts of water and the most water intensives are the refining and petrochemical technologies and also produces large amounts of water due to the extraction of oil and gas. MOL Group is constantly focused on finding ways to improve the handling methods of these large quantities of water. Water management is a key part of the Group HSE strategy, with the goal to reduce the negative environmental impact on the surface and subsurface water bodies. Water saving initiatives are constantly implemented at all business lines and the produced water is reinjected at the production facilities. As the majority of our production operations are situated in EU region, our water management practices are driven by the EU environmental acquis. EU water related standards as well as local related regulations are followed based on the site specific water permits. At the same time, MOL Group has in place an HSE Management System through which water related issues are addressed. For MOL Group operations outside the EU region, and where water related legislation is either missing or not as established, MOL Group applies its HSE Management System and supporting internal regulations. These are developed based on international standards for the oil & gas industry, including IOGP, World Bank etc. For water discharge-related improvement projects, please refer to previous and current annual reports:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/sustainability/our-commitments>

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose publicly the supporting internal regulations. The point 302-2-iv. is omitted because the regulatory requirements are fulfilled but no additional information is unavailable.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



ok

GRI 400

SOCIAL

303

WATER AND EFFLUENTS

303-3

Water withdrawal

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

130



EM-EP-140a.1/ EM-RM-140a.1/ RT-CH-140a.1



6

12

13

14

15

TCFD

303-3 a

The oil and gas industry, consumes large amounts of water for the production facilities but it also produces large amounts of water due to the extraction of oil and gas. MOL Group is constantly focused on finding ways to improve the handling methods of these large quantities of water. MOL Group HSE Management System has provisions for monitoring and reporting all water withdrawals as improving water efficiency not only reduces environmental footprint but often leads to a reduction in operating costs. The water used for different operational activities at MOL Group comes from various sources: it may be surface or groundwater, the municipal water supply, sea water, harvested rainwater or wastewater from production or other organizations. MOL Group monitors and report total water withdrawals from all sources. Information can be obtained from the Annual Report and Data Library through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

As of 2019, MOL Group provides water withdrawal broken down by main divisions in the group-wide Data Library.

303-3 c

Water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters are reported according to the required breakdown by the standard.

IMPROVED REPORTING PRACTICE IN 2020: In 2020 definition of water indicators were revised and more detailed explained in order to understand better water intakes and transfers between different MOL Group reporting units and to avoid duplications in water withdrawal and discharge values.

SUPPORTING DATA

YES

NAME OF INDICATOR

Water Withdrawal - Total/Water Withdrawal - by business/Water Withdrawal - by country

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



303 WATER AND EFFLUENTS

303-4 Water discharge

REPORTING	PARTLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	130	/	EM-RM-140a.1/ EM-EP-140a.2		
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303-4 a and 303-4 b

The oil and gas industry, consumes large amounts of water for the production facilities but it also produces large amounts of water due to the extraction of oil and gas. MOL Group is constantly focused on finding ways to improve the handling methods of these large quantities of water. Total water discharge data, including a breakdown by treatment and type of the discharged water, can be obtained from the Data Library, while supporting narrative can be obtained from present Annual Report, via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

303-4 d

The majority of MOL Group operations are situated inside the EU, hence water management practices are driven by the EU environmental acquis. EU water related standards as well as local related regulations are strictly followed. For operations outside the EU region, local legislation apply as well as industry best practices. According to MOL Group HSE Management System, all key water pollutants are monitored, controlled, reported and measures are applied to reduce water pollution and minimize smells and odors from operations. MOL Group discloses the total amount of petroleum hydrocarbons (TPH), Chemical Oxygen Demand (COD) biochemical oxygen demand (BOD) and suspended solid (SS) content from discharged waters. These are considered as substances of concern for the industry. Data can be obtained from the Data Library, as supporting explanations can be obtained from the Annual Report, both via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

IMPROVED REPORTING PRACTICE IN 2020: In 2020 definition of water indicators were revised and more detailed explained in order to understand better water intakes and transfers between different MOL Group reporting units and to avoid duplications in water withdrawal and discharge values.

PARTIAL REPORTING EXPLANATION:

MOL Group discloses total water discharge as described above, but does not disclose water discharge to all areas, including a breakdown of this by types of destination or category as prescribed by the GRI Standards. MOL Group continuously reviews the Group's sustainability reporting in comparison with existing and emerging reporting frameworks, whilst listening to capital markets and stakeholder feedback. Disclosure of water discharge to all areas, including a breakdown of this by types of destination or category (point c of the standards), as well as point d. under 303-4 is under consideration.

Since 2017, MOL Group began to monitor and report via the CDP the quantities of water discharges by treatment level. Additional information concerning waste management at MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/environment>

SUPPORTING DATA	YES	NAME OF INDICATOR	Water Discharge – Total (Disclosure of Water Discharge by Treatment Introduced in 2019)
LINK	DATA LIBRARY	EXCEL SHEET	ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

303 WATER AND EFFLUENTS

303-5 Water consumption

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

130



EM-EP-140a.1/ EM-RM-140a.1



6

12

13

14

15

TCFD

303-5 a and 303-5 b

The oil and gas industry, consumes large amounts of water for the production facilities but it also produces large amounts of water due to the extraction of oil and gas. MOL Group is constantly focused on finding ways to improve the handling methods of these large quantities of water. As of 2017, MOL Group took the necessary steps to collect and disclose water consumption. Water management is a key part of the Group HSE strategy, with the goal to reduce the negative environmental impact on the surface and subsurface water bodies.

<https://molgroup.info/en/sustainability/our-commitments>

MOL Group does not operate in regions with High or Extremely High Baseline Water Stress: <https://www.wri.org/resources/charts-graphs/water-stress-country>

All the data (starting from 2018) can be obtained from the Data Library and past and present Annual reports via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

As of 2019, MOL Group provides water consumption broken down by main divisions in the group-wide Data Library.

PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose 303-5-c (Change in water storage) and 303-5-d - Information on data compilation. Disclosure is under consideration.

SUPPORTING DATA

YES

NAME OF INDICATOR

Water Consumption – Total (New Indicator – Disclosure Introduced in 2019)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

ENERGY

OG-3

Total Amount of Renewable Energy generated by source

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

129



EM-EP-420a.3



7

9

13

TCFD

A combined 40 728 MWh of renewable energy (solar) was generated during 2021. Information concerning expected energy generation can be obtained from the 2021 Annual Report following the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

304

BIODIVERSITY

304-1

Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



EM-EP-160a.3



13

14

15

TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-2 / 304-3 / 304-4 / OG-4

NOT APPLICABLE

The activities of the oil and gas industry have a direct and indirect impact on biodiversity. MOL Group recognizes these impacts and the fact that it must operate safely and responsibly in order to protect the natural environment and local communities.

At MOL Group level, the technologies that are located in biodiversity-sensitive area have been identified. Exploration and production business is the mostly effected from this perspective therefore BAPs (Biodiversity Action Plan) have been developed for all the HC mining sites operating within Natura 2000 area.

Furthermore, MOL Group applies stringent standards to help reduce any impacts the operations of the Group may have, particularly in critical habitats (areas rich in biodiversity or which are under protection). For any new major projects, as well as for significant expansions of existing operations, MOL Group conduct biodiversity-related studies as a part of environmental and social impact assessment. This is an internal requirement established via the HSE Management System regulation.

Other above mentioned considerations are discussed in more details in the Annual Report, this disclosure topic is non-material for MOL-group.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

304

BIODIVERSITY

304-2

Significant impacts of activities, products, and services on biodiversity

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



EM-EP-160a.3



13

14

15



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-1 / 304-3 / 304-4 / OG-4

NOT APPLICABLE

The activities of the oil and gas industry have a direct and indirect impact on biodiversity. MOL Group recognizes these impacts and the fact that it must operate safely and responsibly in order to protect the natural environment and local communities.

MOL Group applies stringent standards to help reduce any impacts the operations of the Group may have, particularly in critical habitats (areas rich in biodiversity or which are under protection). For any new major projects, as well as for significant expansions of existing operations, MOL Group conduct biodiversity-related studies as a part of environmental and social impact assessment. This is an internal requirement established via the HSE Management System regulation.

Other above mentioned considerations are discussed in more details in the Annual Report, this disclosure topic is non-material for MOL-group.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

304

BIODIVERSITY

304-3

Habitats protected or restored

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



EM-EP-160a.3



13

14

15

TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-1 / 304-2 / 304-4 / OG-4

NOT APPLICABLE

The activities of the oil and gas industry have a direct and indirect impact on biodiversity. MOL Group recognizes these impacts and the fact that it must operate safely and responsibly in order to protect the natural environment and local communities.

Developed Biodiversity Action Plans identify protected habitats and set out the measures needed to protect/restore them. Furthermore, MOL Group applies stringent standards to help reduce any impacts the operations of the Group may have, particularly in critical habitats (areas rich in biodiversity or which are under protection). For any new major projects, as well as for significant expansions of existing operations, MOL Group conduct biodiversity-related studies as a part of environmental and social impact assessment. This is an internal requirement established via the HSE Management System regulation.

Other above mentioned considerations are discussed in more details in the Annual Report, this disclosure topic is non-material for MOL-group.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

304

BIODIVERSITY

304-4

IUCN Red List species and national conservation list species with habitats in areas affected by operations

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



EM-EP-160a.3



13

14

15



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-1 / 304-2 / 304-3 / OG-4

NOT APPLICABLE

The activities of the oil and gas industry have a direct and indirect impact on biodiversity. MOL Group recognizes these impacts and the fact that it must operate safely and responsibly in order to protect the natural environment and local communities.

Developed Biodiversity Action Plans identify IUCN Red List species and national conservation species with habitats and set out the measures needed to protect/restore them

Furthermore, MOL Group applies stringent standards to help reduce any impacts the operations of the Group may have, particularly in critical habitats (areas rich in biodiversity or which are under protection). For any new major projects, as well as for significant expansions of existing operations, MOL Group conduct biodiversity-related studies as a part of environmental and social impact assessment – this is an internal requirement established via the HSE Management System.

Other above mentioned considerations are discussed in more details in the Annual Report, this disclosure topic is non-material for MOL-group.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

BIODIVERSITY

OG-4

Number and percentage of significant operating sites in which biodiversity risk has been assessed and monitored

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-160a.3



13

14

15



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-1 / 304-2 / 304-3 / 304-4

The activities of the oil and gas industry have a direct and indirect impact on biodiversity. MOL Group recognizes these impacts and the fact that it must operate safely and responsibly in order to protect the natural environment and local communities. MOL Group applies stringent standards to help reduce any impacts the operations of the Group may have, particularly in critical habitats (areas rich in biodiversity or which are under protection). For any new major projects, as well as for significant expansions of existing operations, MOL Group conduct biodiversity-related studies as a part of environmental and social impact assessment – this is an internal requirement established via the HSE Management System.

In 2014 a group-wide assessment was conducted to identify potentially sensitive areas which should be the focus of future efforts. This study was updated in 2017 and in 2020 to reflect operational changes.

All sites that are in located in biodiversity critical areas are covered by biodiversity action plans that are annually reviewed in accordance with the HSE Management System. The MOL Group HSE Management System has introduced the compulsory elaboration of the Environmental and Social Impact Assessment studies for all new development or major modifications of the existing facilities and the obligation to have Biodiversity Action Plans in place for all critical sites.

PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose the number of significant operating sites in which biodiversity risk has been assessed and monitored, and not in percentage terms as prescribed by the GRI Standards., nor does MOL disclose OG-4 - 2.2 (Biodiversity Action Plan methodology). This disclosure topic is non-material for MOL-group as described in our materiality analysis, and information is unavailable at the moment.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

305

EMISSIONS

305-1

Direct (Scope 1) GHG emissions

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

127,
128



EM-RM-110a.1/ EM-EP-110a.1



12 13 15



305-1 a, 305-1 d

As an integrated oil and gas company, MOL Group has a significant carbon footprint. Transparency concerning the footprint of MOL Group operations is a high priority. MOL Group's total carbon footprint includes direct emissions from MOL Group operations (Scope-1). Information on MOL Group's GHG Scope 1 emissions, including supporting narrative, can be obtained in the Data Library, the Annual Report and on the Group website via the following links:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/sustainability/climate-change>

The base year for GHG scope 1 emission calculation is 2019, in accordance with the MOL Group 2030 strategy. The MOL Group data for this year is 6,93 Mn tons

305-1 c, 305-1 e

MOL Group GHG Scope 1 calculation is based on the following methodology: Venting, Physical and Chemical processing, Flaring, Generation of heat, steam and electricity (incl. natural gas), Transportation (fuel for corporate vehicles). MOL Group's Scope 1 is made up of CO2 (GWP=1) and Methane (GWP=25). Scope-1 does not include Hydrofluorocarbons, Nitrous oxide, Perfluorocarbons and Sulphur Hexafluoride as these are not relevant, these are not applicable to MOL Group. In its Scope 1 calculation, MOL Group does not account for Biogenic CO2 emissions, this information is currently unavailable.

IPCC: https://www.ghgprotocol.org/sites/default/files/ghgp/Global-Warming-Potential-Values%20%28Feb%2016%202016%29_1.pdf

305-1 g

Methodology:

The Greenhouse Gas Protocol <https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf>

IPIECA: http://www.ipieca.org/media/2849/og_industry_guidance_on_voluntary_sustainability_reportng_3rd_ed_2016.pdf

305-1 b

For the accounting of Scope 1 emissions, MOL Group only reports for carbon dioxide (CO2) and methane (CH4) emissions. Accounting and reporting of the other five greenhouse gases covered by the Kyoto Protocol – nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3) – are not included as these are not emitted by MOL Group (non-applicable).

305-1 f,

FUTURE MOL GROUP SCOPE 1 EMISSIONS

In addition to full disclosure around current Group emissions, MOL Group is fully transparent with the future footprint of the Group. During 2018, MOL Group, in cooperation with sustainability advisor Quantis, carried out its first climate change scenario analysis. The scenario analysis was completed by estimating the annual GHG Emissions Scope 1, 2 and 3 of up until 2030 using current group operations combined with the Group's 2030 strategic plans, including several forward-looking assumptions. The analysis applied three International Energy Agency scenarios, using as basis for calculation the decrease of oil related tones of CO2 emissions in transport for the years 2017-30 for each scenario, with reduction factors calculated based on transport related emissions for EU28. Details can be obtained under MOL Group capital markets communication materials (*Investor Presentation - February 2019* – slides 78, 79) via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

PARTIAL REPORTING EXPLANATION: 305-1-c: Biogenic CO2 emissions in metric tons of CO2 equivalent data is not available at this moment.

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Direct GHG (Scope-1)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

305

EMISSIONS

305-2

Energy indirect (Scope 2) GHG emissions

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

122



EM-RM-110a.1/ EM-EP-110a.1



12

13

15



305-2 a, 305-2 d

As an integrated oil and gas company, MOL Group has a significant carbon footprint. Transparency concerning the footprint of MOL Group operations is a high priority. MOL Group's total carbon footprint includes indirect emissions related to purchased energy (Scope-2). MOL Group Scope 2 emissions are disclosed both by market and location based. Information on MOL Group's GHG Scope 2 emissions, including supporting narrative, can be obtained in the Data Library, the Annual Report and on the Group website via the following links:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/sustainability/climate-change>

The base year for GHG scope 1 emission calculation is 2019, in accordance with the MOL Group 2030 strategy. The MOL Group data for this year is 6,93 Mn tons

305-2 c

Gases included in the calculation: CO2, CH4

305-2 g

Scope 2 is based on the following calculation: Total GHG emissions from purchased electricity consumption + Total GHG emissions from other indirect energy consumption. For operations inside the EU, MOL Group applies the AIB standards (link below) to reach GWP values to calculate total emissions in CO2 equivalent (CO2e). For operations outside the EU, MOL Group applies the International Energy Agency. For standards, methodologies, assumptions and/or calculation tools used:

The Greenhouse Gas Protocol <https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf>

AIB: https://www.aib-net.org/sites/default/files/assets/facts/residual-mix/2018/AIB_2018_Residual_Mix_Results_v1_1.pdf

IPECA: http://www.ipeca.org/media/2849/og_industry_guidance_on_voluntary_sustainability_reportnig_3rd_ed_2016.pdf

Explanation on the difference between location and market-based scope 2 emissions, refer to the *GHG Protocol Scope 2 Guidance* in the following link:

https://ghgprotocol.org/sites/default/files/Scope2_ExecSum_Final.pdf

305-2 e

In case of GWHP IPCC assessment report is used:

IPCC: https://www.ghgprotocol.org/sites/default/files/ghgp/Global-Warming-Potential-Values%20%28Feb%2016%202016%29_1.pdf

305-2 f

FUTURE MOL GROUP SCOPE 2 EMISSIONS

In addition to full disclosure around current Group emissions, MOL Group is fully transparent with the future footprint of the Group. During 2018, MOL Group, in cooperation with sustainability advisor Quantis, carried out its first climate change scenario analysis. The scenario analysis was completed by estimating the annual GHG Emissions Scope 1, 2 and 3 of up until 2030 using current group operations combined with the Group's 2030 strategic plans, including several forward-looking assumptions.

The analysis applied three International Energy Agency scenarios, using as basis for calculation the decrease of oil related tones of CO2 emissions in transport for the years 2017-30 for each scenario, with reduction factors calculated based on transport related emissions for EU28. Details can be obtained under MOL Group capital markets communication materials (*Investor Presentation - February 2019* – slides 78, 79) via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Indirect GHG (Scope-2) – Location based/Total Direct GHG (Scope-2)- Market based

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

305

EMISSIONS

305-3

Other indirect (Scope 3) GHG emissions

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

122



12 13 15



As an integrated oil and gas company, MOL Group has a significant carbon footprint. Transparency concerning the footprint of MOL Group operations is a high priority. MOL Group's total carbon footprint includes the emissions not related to the Group's operations but to the use of our products or emissions generated by our suppliers (Scope 3). Information on MOL Group's GHG Scope 3 emissions, including a detailed breakdown and supportive narrative, can be obtained in the Data Library, the Annual Report and on the Group website via the following link: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

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 footprint 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 CO2 footprint of its production. For the calculation of CO2 emissions, MOL Group uses the average-data method calculation and applies CO2 conversion factors from the Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources ([LINK](#))

Category 2. Capital Goods (steel and concrete for construction): MOL Group includes in its Scope 3 calculation the footprint of the externally produced steel and concrete purchased by MOL Group. For 2020, MOL Group included in the calculation the data for the construction of two main projects: Polyol chemical plant and the new HQ). For the calculation of CO2 emission, MOL Group uses the average-data method calculation and applies CO2 conversion factors in case of steel from the World Steel Association ([LINK](#)) and in case of concrete from the Global Cement and Concrete Association ([LINK](#)).

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 emission calculation, therefore Category 3 is not material for the company in the Scope 3 emission calculation.

Category 4. Upstream Transportation and Distribution: MOL Group includes in its Scope 3 calculation the footprint of the transportation of externally produces crude oil purchased by MOL for processing in the Group's refineries. For the calculation of CO2 emission, MOL Group uses the distance-based method calculation and applies CO2 conversion factors from the Greenhouse gas reporting: conversion factors used for the 2020 CO2 calculation were obtained from the UK Government ([LINK](#)).

Category 5. Waste generated in operations: currently not reported. Currently, boundaries are being determined and data is being collected for future reporting and disclosure.

Category 6. Business Travel: This is not a material source of Scope 3 emissions in MOL Group's value chain. Employees travelling for business-related transportation mainly use the MOL Group's own internal fleet which is accounted for under Scope 1. In addition, during 2020 most of the employees switched to home office and most of the business travels were canceled due the pandemic situation. In 2019, business travel accounted for around three thousand tonnes of CO2 (non-material).

Category 7. Employee Commuting: This is not a material source of Scope 3 emissions in MOL Group's value chain. Furthermore, during 2020, most the employees switched to home office due the pandemic situation reducing the need to commute. Those commuting using MOL Group fleet cars are accounted for under Scope 1.

Category 8. Upstream Leased Assets: Not relevant. An emissions figure is not calculated for this category as MOL Group does not lease upstream assets in the course of normal operations.

Category 9. Downstream Transportation and Distribution: This is not a material source of Scope 3 emissions in MOL Group's value chain given the integrated nature of MOL Group. Downstream logistics is accounted for under Scope 1 emission.

Category 10. Processing of Sold Products: This is not a material source of Scope 3 emissions in MOL's value chain in 2020 considering MOL's current Petrochemical portfolio. However, as a growing business, future reporting will cover this category in the future.

CONTINUES NEXT SLIDE

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Indirect GHG (Scope-3)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

305

EMISSIONS

305-3

Other indirect (Scope 3) GHG emissions

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

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12

13

15



CONTINUES FROM PREVIOUS SLIDE

Category 11. Use of Sold Products: (Refinery excl. naphtha). As of 2020, for the CO2 emission Factor (conversion rates) of its different sold refinery products, MOL Group applies the Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Gas Industry from the American Petroleum Industry, pages 148-151 in the following LINK. The methodology includes references to "global warming potential" (GWP). MOL Group includes in the calculation the CO2 impact of following sold products: diesel, motor gasoline (petrol), jet fuel, heating oil, LPG, fuel oil and petroleum coke (excludes naphtha as its byproducts are accounted for under Category 12). Sold fuel includes both own produced as well as purchased (traded) from third parties. Furthermore, as of 2020, the average national blend of biofuels for both gasoline and diesel has been introduced to the calculation. As of 2020, MOL Group does no longer calculate with natural gas produced, but with natural gas sold for the CO2eq calculation. TO BE READ AND UNDERSTOOD WITH OG-13 (Natural Gas)

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 (2021 MOL Group sales are available from the 2016-2021 Data Library LINK) are made up polymers, butadiene and monomers (polymers make up around three quarters of total petrochemical sales). GHG Protocol Scope 3 Standard directs companies to consider estimating emissions for this category if they can reasonably estimate the downstream emissions associated with end use. Consequently, for the calculation of the End-of-Life Treatment of Sold Products calculation, only polymer sales have been considered, as emissions associated with end use can be reasonably estimated. The production of the Group's polymers (plastics) is made up for 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, 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 "Plastics - The facts 2019" report were applied for the end-of-life treatment (disposal) for the plastic packaging industry (in MOL Group's case this applies to LDPE and HDPE). For 2018 (latest available data at the time of reporting) the split was 19% for landfill, 39% for incineration and 42% for recycling LINK for the packaging industry. For PP (automotive), a Vehicle Recycling Rate of 87% has been applied in line with EU statistics LINK, with an assumption being made for the remaining 13% of one fourth being incinerated and three fourths being landfilled. For incineration, in the absence of reliable data, an assumption has been made for 50% being incinerated with energy recovery (an CO2 emission factor of 0.9 tonnes of CO2eq per tonne of polymer was applied) and the remaining 50% without energy recovery (an CO2 emission factor of 3.1 tonnes of CO2eq per tonne of polymer has been applied) for LDPE, HDPE and PP. For landfill, and in line with the Guidance for Accounting and Reporting Corporate GHG Emissions in the Chemical Sector Value Chain, and following engagement with WBCSD, LDPE, HDPE and PP have been classified as durable polymers (products which are known to not degrade within a period of 100 years), therefore no CO2 emissions are generated within the time frame and therefore zero emissions are reported under landfill. For the Scope 3 calculation, recycling was excluded (measured at zero) in line with GHG Protocol Guidance. For PP (construction), recycling and incineration rates have been applied using statistics from Plastic sEurope which can be obtained in the following link: LINK

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. Future reporting on this category is currently under consideration.

Category 15. Investments: As of 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)

Biogenic CO2 emissions have not been incorporated into the calculation.

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Indirect GHG (Scope-3)

LINK

DATA LIBRARY

EXCEL SHEET

CLIMATE CHANGE



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

305

EMISSIONS

305-4

GHG emissions intensity

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

123



12 13 15

TCFD

305-4 a, 305-4 b, 305-4 c, 305-4 d

Downstream operations are the primary source of GHG Scope 1 emissions of MOL Group. MOL Group measures Downstream GHG intensity using the CONCAWE – Solomon CO2 intensity indicator CWT (Complexity Weighted Tones) for refining operations, and the production of High Value Chemicals (HVC) for the petrochemical operations (both are production-based indicators, taking into account the complexity of installations). Gas features into the calculation of GHG emissions intensity in line with Scope-1 calculation methodology (GRI 305-1). Information on MOL Group's GHG emissions intensity and supporting narrative can be obtained from the Data Library and the Annual Report through the following links:

ANNUAL REPORT AND DATA LIBRARY

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Gases included in the calculation: CO2, CH4

SUPPORTING DATA

N/A

NAME OF INDICATOR

Carbon Dioxide (CO2) Intensity – Downstream sites

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

305

EMISSIONS

305-5

Reduction of GHG emissions

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

123



12 13 15



305-5 a, 305-5 b, 305-5 c, 305-5 d

MOL Group is committed to reducing its environmental footprint. Recognizing the importance of increasing energy efficiency MOL Group has taken a number of steps at production facilities over the past few years to improve the efficiency of energy consumption and mitigate or reduce eventual energy losses. MOL Group launches each year a series of energy efficiency reduction measures affecting its own direct emissions. Yearly energy efficiency measures and results are presented are covered in the Annual Report:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

305-5 e

Information on the future reduction in GHG emissions as a result of the Group's 2030+ strategy can be obtained under MOL Group capital markets communication materials (*MOL Group Online Capital Markets Day – February 2021*– slide 10) via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-investor-presentations>

Information on the future reduction as part of MOL Group 2030+ strategy can be obtained from the link below:

<https://molgroup.info/en/sustainability/our-commitments>

<https://molgroup.info/en/strategy-2030#sustainability>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

305

EMISSIONS

305-6

Emissions of ozone-depleting substances (ODS)

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



12

13

15

TCFD

305-6 a, 305-6 b, 305-6 c, 305-6 d

Not applicable to MOL Group. Ozone depleting substances are neither used nor produced by MOL Group. As a result, MOL Group does neither monitor nor does MOL Group report on this indicator.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

305

EMISSIONS

305-7

Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

122



EM-RM-120a.1 / EM-EP-120a.1 / RT-CH-120a.1



3

12

13

14

15

TCFD

305-7 a
MOL Group operates a wide range of technologies and equipment, and the oil and gas industry is considered to be a significant source of air pollutants. Air emissions data can be obtained from the Data Library, as supportive explanations concerning decreases and/or increases can be obtained from the Annual Report. Both can be reached via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

<https://molgroup.info/en/sustainability/environment>

305-7 b
MOL Group is constantly monitoring these emissions and has programmes in place to reduce its volatile organic compounds (VOC), SO2, NOx, CO and Particulate Matter (PM) emissions. For SOx, NOx, CO, PM emissions MOL Group uses direct measurement of emissions. For VOC emissions MOL Group uses leak detection and repair programme (LDAR) that has been in place since 2010. One of the main objective of the new Group HSE strategy is the reduction of diffuse and fugitive emissions. It can result not only a reduction in emissions of air pollutants, but also the mitigation of the unpleasant odour associated with the activity and reduces the risk of fire cases furthermore improves the workplace air quality. Furthermore, MOL Group sells NOx reducing additives reducing nitrogen oxide emissions from vehicles equipped with SCR (selective catalytic reduction) systems.

<https://molgroup.info/en/sustainability/our-commitments>

In addition to measuring the emission of air pollutants, the company also continuously monitors air quality (concentration of SO2, H2S, BTEX,) around Refinery and Petrochemical sites.

MOL Group pays special attention to the reduction of environmental noise effect of major sites. New environmental noise measurements are performed every 5 years and in case of a major investment, the current noise load is taken into account during the project preparation and the design phase.

<https://mol.hu/en/lubricants-autochemicals/cars/adblue/adblue/>

As of 2019, MOL Group provides the following Air Emissions broken down by main divisions in the group-wide Data Library: Sulphur Dioxide (SO2), Nitrogen Oxides (NOX), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Particulate Matter (PM). Link and name of indicator below.

305-7 a
PARTIAL REPORTING EXPLANATION:
MOL Group monitors and reports on a range of air emissions as described above. However, MOL Groups does not currently report on Persistent Organic Pollutants (POP) nor Hazardous Air Pollutants (HAP) as prescribed by the GRI Standards. Furthermore, for air emissions that are disclosed (VOC, SO2, NOx, CO and PM), MOL Group discloses only Group-level figures and not by country and business unit as prescribed by the GRI Standards. MOL Group continuously reviews the Group's sustainability reporting in comparison with existing and emerging reporting frameworks, whilst listening to capital markets and stakeholder feedback. Disclosure of POP, HAP and air emissions by country and/or business unit is under consideration.

SUPPORTING DATA	YES	NAME OF INDICATOR	Sulphur Dioxide/Nitrogen Dioxide/Volatile Organic Compounds/Carbon Monoxide/Particulate Matter
LINK	DATA LIBRARY	EXCEL SHEET	ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

EFFLUENTS AND WASTE

OG-5

Volume of formation of produced water

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



6

12

14

15

TCFD

Significant quantities of produced water are managed by MOL Group's exploration and production facilities. In order to minimize impact, MOL Group aims to re-inject, whenever feasible, the produced water. At all of the Group's EU operations, produced water is re-injected, and as of 2017, the water reinjection system has become fully operational in Pakistan. As result, water quantities sent to evaporation ponds in Pakistan have been reduced by 99%. Water re-injection takes place at Exploration and Production sites to maintain underground pressure, and additional water is also injected to increase pressure of produced water at MOL Group EU operations. Strategies and criteria for the disposal and treatment, and standards used for quality of produced water discharged, including hydrocarbon and salinity, are applied using industry best practice: the IOGP Guidelines for Produced Water Injection:

<https://www.iogp.org/bookstore/product/guidelines-for-produced-water-injection/>

Information regarding MOL Group's volume of produced water can be obtained in the Data Library through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: MOL Group measures but does not disclose total volume of hydrocarbon discharged within produced water, nor does it disclose Percentage of produced water by disposal method.

SUPPORTING DATA

YES

NAME OF INDICATOR

Quantity of Produced Water - Upstream

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

306

WASTE

306-1

Waste generation and significant waste-related impacts

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

122



EM-EP-140a.2



3

6

12

14

TCFD

306-1 a

From continuous operation of the technology and office activity and will be labelled as 'operational' waste, representing the quantities of hazardous and non-hazardous waste that will arise from normal operation (including maintenance, tank cleaning, commercial and office waste, food waste and other organic wastes, packaging materials, batteries, lamps, bulbs, paper etc). The hazardous and non-hazardous waste arising from E&P drilling activities, well completion and workover activities.

From special measures in case of emergency and will be labelled as 'emergency measure' waste. This represents the quantities of hazardous and non-hazardous waste that will arise from special situation/emergency response actions such as spills to environment.

From regular, planned soil and groundwater remediation activities and will be labelled as 'remediation activities' waste. This represents the quantities of hazardous and non-hazardous waste arising from regular, planned remediation activities.

From special projects of construction and demolition of some facilities and will be labelled as 'construction and demolition' waste. This represents the quantities of hazardous and non-hazardous waste arising from construction and demolition activities.

From the recollection activities. Wastes recollected from external partners such as used motor oil, used cooking oil etc, will be labelled as "recollected wastes" and will be reported as such. MOL Group continuously seeks to decrease its environmental footprint by reducing the amount of waste generated and developing treatment, recycling and recovery solutions. Due to the complexity of operations, MOL Group waste streams and types are also very diverse. The company's operations produce a wide range of solid and liquid wastes (including oily sludge, waste chemicals and spent catalysts, etc.). A waste management program is in place at MOL Group , containing as a minimum the identification of waste streams for each operation and feasible measures should be taken to minimize their volume and associated risks, incorporating the methods of reuse, recycle, recovery, pre-treatment and safe and permitted disposal. A hazardous and non-hazardous waste inventory and classification are developed, - and kept up to date for each site/location.plan, in accordance with HSE Management System internal regulation.

Additional information concerning waste management at MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/environment>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Waste Generated/Total Waste Directed to Disposal and -Diverted From Disposal/Ratio of Reused/Recycled Waste

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

306

WASTE

306-2

Management of significant waste-related impacts

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

125



EM-RM-150a.1/ RT-CH-150a.1/ EM-MM-150a.1



3

6

12

TCFD

306-2 a

The European Union's approach to waste management is based on the "waste hierarchy" which sets the following priority order when shaping waste policy and managing waste at the operational level: prevention, (preparing for) reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery). MOL Group's waste management strategy is following these principles.

MOL Group continuously seeks to decrease its environmental footprint by reducing the amount of waste generated and developing treatment, recycling and recovery solutions. Due to the complexity of operations, MOL Group waste streams and types are also very diverse. The company's operations produce a wide range of solid and liquid wastes (including oily sludge, waste chemicals and spent catalysts, etc.). A waste management program is in place at MOL Group, containing as a minimum the identification of waste streams for each operation and feasible measures should be taken to minimize their volume and associated risks, incorporating the methods of reuse, recycle, recovery, pre-treatment and safe and permitted disposal. A hazardous and non-hazardous waste inventory and classification are developed, - and kept up to date for each site/location.plan, in accordance with HSE Management System internal regulation.

PARTIAL REPORTING EXPLANATION:

In case of 306-2 b 306-2 c as the majority of MOL Group operations are located in Europe, the EU legal requirements are followed, complemented with specific local requirements imposed by authorities. In case of these points the information is unavailable at the moment to report.

Additional information concerning waste management at MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/environment>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Waste Generated/Total Waste Directed to Disposal and -Diverted From Disposal/Ratio of Reused/Recycled Waste

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

306

WASTE

306-3

Waste generated

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

125



EM-EP-160a.2



6

12

14

15

TCFD

306-3 a

MOL Group does disclose total weight generated in tonnes, but does not provide a breakdown of this total by composition of the waste. as prescribed by the GRI Standards. The structure of the waste data expresses the waste streams, relevant to the sector or activities.

A waste management programme is in place, containing as a minimum the identification of waste streams for each operation and feasible measures should be taken to minimize their volume and associated risks.

Each operation must ensure that appropriate waste collection methods are in place (including for selective communal waste) and waste management techniques are applied to avoid soil and groundwater pollution and worker exposure. The responsibility of waste producers is exercised to ensure that handling and managing wastes is done in a proper and environmentally responsible way.

<https://molgroup.info/en/sustainability/environment>

306-3 b

To help understand how the data has been compiled, the MOL Group entities specify whether the data has been calculated or directly measured. In case of measurement the sources are e.g. waste transfer notes from contracted waste collectors, etc. Where the data is checked by external assurance, or audits of waste-related data. A waste management programme is in place, containing as a minimum the identification of waste streams for each operation and feasible measures should be taken to minimize their volume and associated risks, incorporating the methods of reuse, recycle, recovery, pre-treatment and safe and permitted disposal. Information regarding MOL Group's waste generation can be obtained from the Data Library, with supporting explanations being provided in the Annual Report.

MOL Group collects the total weight of waste generated in metric tons, and also the breakdown of this total by composition of the waste. The basis of this breakdown is the European Waste Catalog where each type of waste is subscribed and ordered into main categories according to the sector or activity from which they are originates and this categorization gives more additional information about the context of the waste.

These can be obtained through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Waste Generated

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

306

WASTE

306-4

Waste diverted from disposal

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



3

12

TCFD

306-4 a, 306-4 b, 306-4 c

The European Union's approach to waste management is based on the "waste hierarchy" which sets the following priority order when shaping waste policy and managing waste at the operational level: prevention, (preparing for) reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery). MOL Group's waste management strategy is following these principles.

MOL Group collects the total weight of waste diverted from disposal in metric tons, and also the breakdown of this total by composition of the waste. The basis of this breakdown is the European Waste Catalog where each type of waste is subscribed and ordered into main categories according to the sector or activity from which they are originates and this categorization gives more additional information about the context of the waste. The breakdown also relates to the hazardous and non-hazardous featured of the wastes and the exact treatment of them.

306-4 d

In case of each recovery operation listed in Disclosures 306-4-b and 306-4-c the breakdown by onsite or offsite treatment is also provided of the hazardous waste and of non-hazardous waste diverted from disposal in metric tons.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Additional information concerning waste management at MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/environment>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Waste Directed to Disposal

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

306

WASTE

306-5

Waste directed to disposal

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



3

12

TCFD

306-4 a, 306-4 b, 306-4 c

The European Union's approach to waste management is based on the "waste hierarchy" which sets the following priority order when shaping waste policy and managing waste at the operational level: prevention, (preparing for) reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery). MOL Group's waste management strategy is following these principles.

MOL Group collects the total weight of waste directed to disposal in metric tons, and also the breakdown of this total by composition of the waste. The basis of this breakdown is the European Waste Catalog where each type of waste is subscribed and ordered into main categories according to the sector or activity from which they are originates. The breakdown also relates to the hazardous and non-hazardous featured of the wastes and the exact treatment of them.

306-4 d

In case of each operation listed in Disclosures 306-4-b and 306-4-c the breakdown by onsite or offsite treatment is also provided of the hazardous waste and of non-hazardous waste diverted from disposal in metric tons.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Additional information concerning waste management at MOL Group can be obtained through the following link:

<https://molgroup.info/en/sustainability/environment>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Waste Directed to Disposal

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

EFFLUENTS AND WASTE

OG-6

Volume of flared and vented hydrocarbon

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

122



EM-EP-110a.2



3

7

8

12

13

TCFD

Flaring refers to the controlled burning of hydrocarbons for technical or safety reasons. The gas flared in Exploration and Production is typically 'associated petroleum gas' (APG), while in Downstream gases generated during the refining process are usually flared for safety reasons. Oil and gas leakages are considered to be losses of valuable material that represent operational inefficiency.

Venting of gas refers to release without burning. Flaring is important from both an environmental point of view and the perspective of operational efficiency. In recognition of the importance of this topic, MOL Group in 2015 decided to join the Zero Routine Flaring Initiative of the World Bank.

Past and present flaring and venting data can be obtained from the Data Library via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose OG-6-2.2 (volume of continuously flared hydrocarbon by country), OG-6-2.3 (volume of vented hydrocarbon), OG-6-2.4 (Vented hydrocarbon broken down by country) and OG-6-2.5 (Volume of flared and vented HC in relation to volume produced) as recommended by GRI Standards. Disclosure is under consideration.

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Flared Hydrocarbon - Upstream/Total Flared Hydrocarbon - Downstream

LINK

[DATA LIBRARY](#)

EXCEL SHEET

CLIMATE CHANGE



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

307

ENVIRONMENTAL COMPLIANCE

307-1

Non-compliance with environmental laws and regulations

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-140a.2



16

TCFD

MOL Group discloses each year HSE penalties that occur as a result of the Group's operations. Data can be found in the Data Library and supporting narrative can be found in past and present Annual Report using the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Number of violations of environmental legal obligations/regulations that resulted in fines/penalties reached 11 (2015), 35 (2016), 32 (2017), 17 (2018), 7 (2019) and 4 in 2020

PARTIALLY REPORTING EXPLANATION: MOL Group does not disclose 307-1-a-II (Number of non-monetary sanctions) and 307-1-a-III (Cases brought through dispute resolution mechanism). Disclosure is under consideration.

SUPPORTING DATA

YES

NAME OF INDICATOR

HSE - related Penalties

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

EFFLUENTS AND WASTE

OG-7

Amounts of drilling waste (drill mud cuttings) and strategies for treatment and disposal

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



6

12

15

TCFD

REASON FOR OMISSION: MOL Group does not disclose amount of drill mud and cuttings produced using aqueous and non-aqueous drilling fluid by disposal method, nor does MOL disclose OG-7-2.3 (Treatment, disposal and minimization strategies) The information is unavailable at the moment to report this indicator.

SUPPORTING DATA

YES

NAME OF INDICATOR

Hazardous waste, non-hazardous waste from drilling activities, well completion and workover activities

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ENVIRONMENT



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

308

SUPPLIER ENVIRONMENTAL ASSESSMENT

308-1

New suppliers that were screened using environmental criteria

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8

12

TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-9 (SUPPLY CHAIN) AND GRI 204-1 (LOCAL SUPPLIERS)

MOL Group introduced SAP Ariba as a group-level, integrated system that deals with all supplier-related information, from the qualification phase to the contracting stage. This systems includes automated assessment of risks associated with suppliers based on legal, ethical, financial, health and safety, as well as environmentally related data and documentation. The Sustainability questionnaire has an inbuilt scoring mechanism to categorise suppliers into 3 risk levels. In 2018 contractor post evaluation system has been implemented to support contractor performance evaluation.

SAP Ariba: [LINK](#)

Supplier Qualification Process [LINK](#)

Sustainability Questionnaire [LINK](#)

It is obligatory for all new suppliers to be screened using a number of environmental criteria. As a result, all new suppliers were screened using HSE criteria during 2021. Furthermore, all new suppliers must sign and act according to both the Code of Ethics and Business Conduct as well as Business Partner Code Of Ethics. Supporting narrative under the Ethics chapter of the Annual Report regarding ethics coverage in supplier contracts: MOL Group provides supporting narrative under the Contractor Safety chapter of the annual report, as well as Code of Ethics coverage in supplier contracts under the Ethics.

From end of 2021 an upgraded Sustainability Questionnaire has been implemented in the pre-screening process and in all new procedures suppliers must accept and act according to Code of Responsible Procurement, making it part of the contractual relationship.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

308

SUPPLIER ENVIRONMENTAL ASSESSMENT

308-2

Negative environmental impacts in the supply chain and actions taken

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-140a.2



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-9 (SUPPLY CHAIN) AND GRI 204-1 (LOCAL SUPPLIERS)

MOL Groups asks its suppliers to get acquainted with MOL Group's ethical standards, follow these requirements all times, and extend them to their own supply chain. We expect partners to immediately inform MOL Group on a breach of the Code of Ethics and Business Conduct and the implementation of corrective actions regarding any activity performed in connection with MOL Group operations. In the course of operation of our partners (i.e. by own employee conduct or by their suppliers or sub-contractors, intermediaries, proxies or agents), MOL Group reserves the right to apply corrective measures up to and including termination of business co-operation in accordance with the applicable law. Such breaches can be determined in accordance with the principles stated in the MOL Group Ethics Council Rules of Procedure (Appendix of the MOL Group Code of Ethics and Business Conduct - link below) by MOL Group Ethics Council. If non-compliance or breach emerge, MOL Group partners shall co-operate in clarification. As part of this co-operation MOL Group companies participating in the clarification may ask for verification and if there is a reason for concern, for corrective measures by the following means: a) Self-Assessment: e.g. fill in a questionnaire, conduct internal investigation or solicit information from a third party, e.g. a data provider or public information on compliance; b) certifications/statements: e.g. certification or statement confirming compliance) Pre-Qualification Audits: MOL Group or a third party acting on MOL Group's behalf may contact business partners and ask for permission to verify compliance on their site. MOL Group also regularly performs On-Site audits to verify compliance to MOL standards during suppliers activities on our area of operation.

Furthermore, MOL Group Procurement has established the framework of Responsible Procurement and asks its suppliers to accept and apply the provisions of Code of responsible Procurement and to extend these to their supply chain. Suppliers have to share information about sustainability questions and these inputs are considered during category strategy creation, Supplier Relationship Management and within the framework of these, definition of possible correction action plans or KPIs for sustainability topics.

Additional information on MOL Group's supply chain can be obtained via the below link:

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

<https://molgroup.info/en/about-mol-group/supplier-center/responsible-procurement>

PARTIAL REPORTING EXPLANATION: MOL Group conducts HSE (incl. environmental) evaluation for all contractors. However, MOL Group does not monitor, therefore does not register negative environmental impact in the supply chain

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

OG

PRODUCTS AND SERVICES

OG-8

Benzene, Lead and Sulfur content in fuels

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



3

12



MOL Group fulfils actual EU requirements and national standards, therefore the benzene, Lead and Sulphur content in different fuels suitable to EU standards. MOL Group's refineries built new hydrotreater units in all locations for sulphur content reduction. Furthermore, MOL Group refineries use different high octane blending component (ethanol, ETBE, MTBE, alkylate), which ensure the production of lead-free gasolines. The benzene is separated from the gasoline fraction and this modification reduced benzene content of the gasoline. The quality of the fuels of MOL Group is in line with EU and national regulations. MOL Group has Safety Data Sheets (SDS), which are available for the customers through the webpage (link below) or directly from the sales organizations.

MOL

<https://www.molgroupchemicals.com/en/catalogues-certificates>

INA:

Safety data sheets (SDS) of fuels provides Benzene content (range). Lead and Sulfur content in fuels are not part of Section 3 (Composition) and Section 9 (physical and chemical properties) of SDS (link below) and are not published. Those data (including exact Benzene content) are part of the product specification and are communicated to the customer. INA does not use Lead based additives in produced fuels.

<https://www.ina.hr/en/home/customers/products-and-services/safe-management-of-product/safety-data-sheets/>

SLOVNAFT:

<https://slovnaft.sk/sk/o-nas/trvalo-udrzatelny-rozvoj/zdravie-a-bezpecnost/reach/karty-bezpecnostnych-udajov-kbu/safety-data-sheets-sds/en/>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

401 EMPLOYMENT

401-1 New employee hires and employee turnover

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TR-RO-320a.3



5 8



MOL Group discloses a range of data concerning new employee hires and employee turnover. This includes a) total number of new employee hires during each reporting period, by age group, gender and region. b) total number of leavers during the reporting period, by age group, gender and region. And c) total number and rate of employee turnover during the reporting period, by age group and gender. This information can be obtained from the Data Library via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

MOL Group carries out Group-level employee engagement surveys on a biannual basis. In 2019 the Sustainable Engagement score reached 79%. The analysis is broken down based on the following categories: age groups, gender, management level and countries (while the results of these breakdowns are not publicly available). For the details of the latest engagement survey, please see the Integrated Annual Report (available via the link above).

Recruiting & hiring (e.g. evaluating recruiting channels, screening of candidates, assessing talent supply/demand): Recruitment is separately monitored and reported via relevant recruitment related KPI's (time to hire, successfulness of different hiring channels, etc.). Based on these information, Recruitment team is adjusting their actions when new hiring is initiated.

Identification of flight risks as a means to improve retention: In performance management process, MOL Group collects information on the risk of loss (departure) of employees and the impact of such a loss (departure). This is performed in order to ensure that key employees with a high impact in case of departure are identified and that proper attention is given to their retention, especially in cases where risk of loss is also assessed as high. Mitigating step items include but are not limited changes to incentive schemes, training and educational offers etc. Furthermore, MOL Groups applies Exit Interviews and regularly analyzes collected data to determine the main reasons for voluntary turnover. Exit data information are shared with relevant managers to ensure that the areas identified as 'issues' are addressed, and retention is increased.

Measurement of employee performance: In order to align with business requirements to the maximum extent and considering that MOL Group business portfolio is quite diversified, within MOL Group we have several applicable performance management schemes (e.g. annual short term incentive program, sales bonus, trader incentive, etc.). All MOL employees are enrolled in one of the performance management schemes applicable within the respective company and pending on specifics of the scheme, employee performance is monitored on quarterly or annual basis. Employee performance is evaluated against set individual or team targets / KPI's connected with business goals and overall company strategy. Within performance management MOL Group focus not only on achievement of the set targets for the employees, but also how the targets are achieved, making sure that employees have also Individual Development Plans set with focus on development of the soft skills and/or technical knowledge the employee needs to be successful on current or future position.

As of 2021, MOL Group provides disclosure of turnover rate broken down by voluntary vs non-voluntary on a Group level. Link and name of indicator as the bottom of the page.

PARTIAL REPORTING EXPLANATION:

MOL Group does monitor and register turnover rate by region but does not disclose it. However, hires and leavers are disclosed by region.

SUPPORTING DATA

YES

NAME OF INDICATOR

New hires total (incl. by region, gender and age) / Turnover Rate (incl. by voluntary vs involuntary, gender and age)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

401

EMPLOYMENT

401-2

Benefits provided to full-time employees that are not provided to temporary or part-time employees

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



3 8

TCFD

MOL Group believes that investment in employee wellbeing contributes to employee engagement and helps maximize an innovative approach to reach full potential. Larger MOL Group companies and subsidiaries offer a wide range of initiatives supporting employees in respect of their health, financial planning, workplace environment and community and employer care in every life stage. MOL Group cares for the wellbeing of its constantly changing and diverse, multigenerational workforce whose needs are met through a wide range of programs, benefits, initiatives and wellbeing programs, making up an essential part of employees' Total Remuneration. Insurance is a crucial benefit form in the Oil & Gas industry, and MOL Group puts strong focus on the health and safety of its workforce with various work conditions. Personal insurance is provided to all employees across the Group in various forms. MOL Group ensures that employees are covered by social benefits and pension. Employees may choose a voluntary pension fund and can use a part or the whole of their fringe benefits for this purpose. MOL Group provides attractive benefit schemes across its locations to ensure competitiveness on local markets together with all elements of the pay mix. When benefit elements are defined, local legislation, tax environment and competitiveness on local markets are screened to provide Group-level consistency. Flexible working options are available in several companies across the Group in order to leverage creativity and productivity of employees, encourage diversity, and a sustainable work-life balance. The two main forms are FlexiPlace which enables working from home and FlexiTime which enables flexible start and end working time. At MOL Group, employment is the basis of benefits provided and does not depend on whether an employee is full-time or part-time. However, certain benefits provided to part-time employees are offered on a pro-rata basis.

<https://molgroup.info/en/sustainability/human-capital>

REASON FOR OMISSION: required detailed information not available at the moment, disclosure under discussion

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

401 EMPLOYMENT

401-3 Parental leave

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



5 8



MOL Group has a Diversity & Inclusion framework, which is integrated part of strategy 2030 with focus areas of wellbeing, and work-life balance, gender equality and age diversity, parental status, physical abilities and ethnicity. Furthermore, MOL Group is committed to prohibiting and preventing discrimination of any kind, including matrimonial or parental status. This is enshrined into the MOL Group Code of Ethics and Business Conduct, under section IV.2.2.Equal Treatment And Opportunities. All employees of MOL Group are entitled to parental leave regardless of gender. The length of the parental leave will vary depending on the current rules of each jurisdiction in which MOL operates. MOL Group complies with all national legislation in all jurisdictions in which it operates.

OMISSION EXPLANATION: MOL Group does monitor and register the following information:

- a. Total number of employees that took parental leave, by gender.
- b. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.
- c. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender
- d. Return to work and retention rates of employees that took parental leave, by gender.

MOL Group does not disclose these figures as prescribed by the GRI Standards. MOL Group will aim to increase disclosure around parental leave in line with capital markets and stakeholder feedback as from 2022.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

402

LABOR MANAGEMENT RELATIONS

402-1

Minimum notice periods regarding operational changes

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



Number of weeks notice provided will depend on the different jurisdiction. Where Collective Agreements are in place, the extent of consultation and the time periods are specified in the agreement. MOL Group complies with all local regulations covering notice periods for any changes and keeps in mind the employee representatives involvement already during the discussions on any business driven change impacting employees. Refer to GRI 404-2 for operational changes.

PARTIAL REPORTING EXPLANATION:

MOL Group does not provide information for indicator 402-1/a as prescribed by the GRI Standards, information not available at this stage

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403 OCCUPATIONAL HEALTH AND SAFETY

403-1 Occupational health and safety management system

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3

8



a. MOL Group has implemented an occupational health and safety management system based on recognized risk management, and to ensure a unified approach of all HSE relevant matters, since in different countries of the Group many different legal frameworks and regulations exist. Of course everywhere the strictest requirement prevails.

<https://molgroup.info/en/sustainability/our-commitments> where HSE Management System information available under https://molgroup.info/storage/documents/sustainability/hse1.1_pd1_v2_en.pdf

The HSE management system has been implemented at MOL Group based on the recognition of the value of a risk-based management system, including standards and guidelines which totally covers all aspects of HSE. However, given the integrated nature of the business, MOL Group, is active in several industries through different businesses in different jurisdictions. As a result, in some cases, legislation requires to have some specific ISO/ OHSAS related accredited certifications. The list of countries and/or businesses which have standard based certifications, required by either law or customers (internal/external) can be obtained from the link below:

- <https://molgroup.info/hu/a-mol-csoportrol/szabvanyos-iranyitasi-rendszerek-es-tanusitvanyok>
- <https://slovnaft.sk/en/about-us/our-company/managing-the-corporation/standard-based-management-systems/policies-certificates/>
- <https://www.ina.hr/en/home/about-ina/certificates/>

b. The HSE management system covers

- all workers whose work controlled by the organization,
- all activities that are controlled by the organization, and
- all workplaces that are controlled by the organization .

No workers, activities, or workplaces are left uncovered.

HSE POLICY AND STRATEGY

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-2

Hazard identification, risk assessment, and incident investigation

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3 8



- a. 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 control must be followed as far as is reasonably practicable when defining risk mitigation measures: a) elimination; b) substitution, c) engineering control, d) administrative control, and e) personal protective equipment.
These processes in general follow the main group requirements but considering the very different legal obligations need to comply with local law. Accordingly, the competent personnel (everywhere meet health and safety local legal requirements) also fulfill 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 on 20 December 2021) to ensure the continuous improvement, in parallel with industrial best practices. The updating starts from Group level, managed by the relevant professional area's experts and leaders, then it is followed by a 2-round, wide, business and HSE professional commenting, to get the final consensus.
- b. 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 should be corrected to prevent future recurrence, losses and interruptions to operations by improving the management system and organizational culture that allowed the incidents to occur in the first place. Based on HSE Management System (HSE1.1_PD1) HSE MS, ELEMENT 10: INCIDENT MANAGEMENT 2.1.1. Incidents must be reported (personally, via phone, via SMS or e-mail) to the relevant supervisor and direct reporting leader/manager. Thanks to this written rule workers are protected against any reprisals. Additionally, the messages about our new Life Saving Rules clearly state, that „All MOL Group employees and contractors should adhere to the safety rules, intervene and stop work if there is a doubt about safety, so everybody can return home safely after our working day!“ as well as the aim „...to ensure you a license to say 'NO'...“ Although these messages are explicitly stated in connection with Life Saving Rules, they are valid at each and every safety-relevant aspects. Pls. see the LSR training material for employees as example: Life Saving Rules - Supplier Center - About MOL Group – MOLGroup. MOL Group's Incident Reporting and Investigation System (Enablon) integrates immediate electronic reporting of incidents through emailing and the tool we employ for thorough incident investigation. For investigating serious incidents, we apply the industry standard 'Tripod' methodology as one of acceptable root cause analysis systems. Lessons learnt are shared throughout the company in comprehensive summaries and photos as part of the HSE Alert system to increase the level of awareness of all employees. We encourage all employees and contractors to report all HSE events, even the unsafe conditions and acts potentially leading to those. We are committed to share all information in a personalized way as much as possible. <https://molgroup.info/en/sustainability/health-and-safety>
- c. On the highest level in HSE Management System (HSE1.1_PD1) HSE MS, ELEMENT 3: Competence, Training & Behavior 7. C) we declare that „everyone understands their responsibility to "Stop and Intervene" and is motivated to apply Stop Work Authority during any activity in which risk is not adequately controlled or refuses to work in circumstances that may cause HSE harm“. Additionally, according to the HSE MS appendix 6. II. 2.2 Rights and responsibilities, 1 C „ Every employee has the right to have and use "Stop Work Authority" whenever real or potentially unsafe conditions or unsafe actions are identified“. Thanks to this written rule workers are protected against any reprisals – pls. see the explanation and example given at point b./ above.
This aspect was considered as a Life saving rule in our previous 10-rule set, however when we updated this to our actual 6 life saving rules, this was considered as a general everyday approach over the rules – kept as main message in all training materials and communications of LSRs, as shown in the explanation and example given at point b./ above.
All these conditions – without having real HSE events happened – are reported and managed in the local near miss/stop card reporting systems, not necessarily in Enablon, since not the whole staff of the Group has access to it.
- d. Incident Investigation: Maximum 2 working days after an incident occurred or in other, duly justified cases the initial consequence classification must be reviewed and modified via Enablon so that electronic notifications can be sent out, if necessary. An Investigation Team must be nominated within 2 working days following the occurrence of an incident by the responsible person. Depth of investigation, selection of investigation method or involvement of specialists/experts (e.g., authorized fire safety experts) must be determined based on severity or nature of the incident. Incident investigations need to be able to satisfy relevant statutory legal requirements and to be usable in relation to potential insurance claims or litigation. Investigation Reports must be finalized as soon as possible, but within a maximum of 60 calendar days (including validation(s) in Enablon) from the time of incident occurred. <https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA N/A

NAME OF INDICATOR N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

403 OCCUPATIONAL HEALTH AND SAFETY

403-3 Occupational health services

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3

8



a. The protection of employees from occupational health hazards is assured by compliance with national laws and internal MOL Group regulations and practices, combined with high quality operating staff. MOL applies best practices in its local operations which are continuously improved. Regularly required occupational health and medical services:

- the service provider carries out the job suitability tests specified in the separate legislation and initiates the necessary specialist examinations,
- investigate, in accordance with the specific legislation, occupational diseases, cases of increased exposure,
- 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,
- guides the occupational health records of employees properly;
- takes part in labor safety relevant pre-start-up safety reviews, and workplace hygiene inspections;
- conducts an examination of the conditions of employment of workers with disabilities,
- investigate occupational diseases and suspicions, organize special investigations, and conduct statutory procedures,
- complies with all reporting obligations for occupational health,
- cooperates in defining and managing pandemic prevention and protection measures (in cooperation with further specific professional service providers).

The obligation and details of management of the above-mentioned process is defined on the highest level in HSE Management System (HSE1.1_PD1), Appendix 6B. I. 2.2. Fitness for duty. The access of this health services even above the MOL Group requirements in vast majority of the countries is a strong legal obligation as well. The high quality of the services is ensured by 1. very strong tendering in case of new contracts, 2. continuous close professional cooperation (group and local levels) with all service providers for continuous improvement based on best industrial practices. Among the services providers there are subsidiaries of big and recognized international companies, big national and local service providers, specialized health services (e.g. Affidea, Medicover, Buda Health Center, ProCare etc.)

<https://molgroup.info/en/sustainability/health-and-safety>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-4

Worker participation, consultation, and communication on occupational health and safety

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3 8



- a. MOL Group's internal communication with the workers is assured by compliance with national laws and internal MOL Group regulations and practices. "Work safety councils" are present across MOL Group operations and provide a constant communication channel within MOL Group between management and – independently elected – MOL employees. Establishing "Work safety councils" is a legal requirement in many countries of MOL Group operations. The right and at the same time task of the work safety council is to participate and even challenge in the decisions of the employer, and the basis of its operation is the cooperation of employers and employees.
- b. The local "Work safety councils" are operating and having regularly meetings and forums (at least on a quarterly basis) based on the local law and operational descriptions. The law allows employees to exercise their right to participate in a number of ways, depending on the number of employees and the structure of the employer organization. European Works Councils (EWC) are information and consultation bodies representing employees in European multinational companies. MOL Groups' councils have delegation.

PARTIAL REPORTING EXPLANATION:

MOL Group does not provide information on 403-4-b (information about the work, authority, frequency of meeting of Work Safety Councils)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-5

Worker training on occupational health and safety

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

126, 127



EM-EP-320a.2



a. MOL Group provides regular occupational health and safety trainings for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization (contractors). This includes generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations. Supportive narrative is provided in the Annual Report on examples of training provided:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

(regarding different OHS trainings short summary is available on pages 126-127, in the personal safety, retail safety and PSM parts)

Recruitment, selection and placement processes must be in place to ensure that personnel are qualified, competent and physically and mentally able to meet job requirements. Legally required HSE qualifications must be met for specific jobs. Employee and contractor/supplier HSE and process safety competencies and training needs must be identified, documented and periodically reviewed. Training plans and calendars must be synchronized with HR for the best resource management. Written procedures must exist to govern HSE Competency Assessments and Training procedures at company level. It must contain the following:

- a. Content; length of the induction HSE Training and the way of examination;
- b. Requirements regarding the training of visitors, students and part time employees;
- c. Practical training requirements if applicable;
- d. Refreshing training requirements including frequency (yearly frequency is recommended) and topics: induction and practical training topics, new HSE requirements becoming effective since the last training, and lessons learned from incidents.

<https://molgroup.info/en/sustainability/health-and-safety>

MOL Group continuously seek for real 21st century training method possibilities with the aim of higher training efficiency. The first already widely implemented solution is the eSMILE system in Consumer Services, covering all our Retail Service Station network. All business and safety related information (in last period Covid-19 relevant once as well) was provided daily to frontline staff through the eSMILE online learning platform, introduced originally for any kind of trainings, distributing learning materials and information needed for the continuously safe and high-quality operation on an interactive way, accessing the whole SeS staff on their mobile devices. The general induction training is also available on this platform in all countries, and the eSMILE Fire Safety module was introduced as well in 2021.

SUPPORTING DATA N/A

NAME OF INDICATOR N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-6

Promotion of worker health

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3 8



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 an additional tool 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 all operating companies in order to identify the critical gaps to our standards and required level of compliance, and set appropriate actions to eliminate them in an acceptable period of time. We believe that by implementing the identified and approved development actions MOL Group definitely takes a step ahead towards providing healthy workplaces and appropriate health management, including emergency response for all employees. According to MOL Group health management principles we order health screenings at least once per 3 years to all of our employees based on a detailed screening protocol (depending on the nature of their work).

- a. Besides this, we conduct screenings for known health risks (such as diabetes, cholesterol, stool blood test, calculation of Body Mass Index (BMI), etc.) and we draw up an individual health plan for all of our employees. Individual health plans are a professional starting point, but we also offer special workplace health promotion programs to our employees, that include medical screenings (cardiovascular package, cancer prevention package, musculo-skeletal package, vaccination programs), healthy life style advice, dietary advice, stopping smoking programs and a wide range of physical activity programs.
- b. 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.). Health promotion programs are organized locally in order to contribute to both the health and well-being of employees. Some selected best practices: In INA HEALTH program was expanded with psychological help first in 2020 due to earthquakes, then in last year it was put available in all major countries to support the COVID-19 related situation. In addition to this all necessary measures were still prescribed to fight the COVID-19 pandemic's recurring waves. In MOL HU Health programs were defined this year too by COVID - 19, to which we have strengthened, but not exclusively, strengthened our mental health program. As part of our crisis management those who were struggling with life situation challenges, emotional distress was able to use online mental psychology service called Mental Hygi and online psychologist service. For our colleagues travelling to and working in countries with a high risk or incidence of communicable diseases we conduct medical screening before travelling and after, and we supply the required vaccinations as well. MOL Group is providing 24/7 services for any medical evacuation (MEdEvac) needed around the globe for its expatriates and travelers, and in special situations the local employees of MOL operations if medically necessary, by contracting one of the leader service providers of the industry. Contractors of MOL Group are not covered by these initiatives.

<https://molgroup.info/en/sustainability/health-and-safety>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-7

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3

8



a. Ownership of Product Stewardship within MOL Group and relevant member companies must be assigned and responsibilities for individual Product Stewardship process steps must be defined. Product stewardship process must 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 must be conducted prior introduction to market in order to identify and address health, safety and environmental hazards and risk associated with their normal use and potential misuse. Periodic re-assessments must be conducted if product specification changes, including collection and review of adverse effects reported or experienced. Records of assessment and re-assessment must be kept up-to-date. A product dossier must be established for all dangerous products bringing together all the information that the company holds on a product throughout the lifecycle.

The OHS aspects are described in the element 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.

HSE Management System available on the website:

<https://molgroup.info/en/sustainability/our-commitments> under https://molgroup.info/storage/documents/sustainability/hse1.1_pd1_v2_en.pdf

<https://www.molgroupchemicals.com/articles/3/innovation-together>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-8

Workers covered by an occupational health and safety management system

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-320a.2



3 8



- a. MOL Group health and safety management system (link below) covers all workers, including those who are not employees of the Group (contractors) but whose workplace is controlled by MOL Group.
- b. No workers have been excluded.
- c. The provisions of this management system are mandatory and binding for all affected employees for all types of operations and projects. The management system is part of MOL Group's regulatory system in form of a Process Description. In addition to its general principles, detailed requirements are regulated in appendices and 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.

The internally audited HSE management system of MOL Group covers 100% of all our on-site contractors. All employees and workers performing high HSE risk activities for MOL Group, who are not employees but whose work and/or workplace is controlled by the organization, should be covered by a system that has been audited or certified by an external party (SCC/VCA). Absolute numbers are hard to be given as it is highly variable based on the number and extent of given activities all over the Group.

<https://molgroup.info/en/sustainability/our-commitments>

HSE Management System available on the website:

<https://molgroup.info/en/sustainability/our-commitments> under https://molgroup.info/storage/documents/sustainability/hse1.1_pd1_v2_en.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-9

Work-related injuries

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

131, 133



EM-EP-320a.1/ EM-RM-320a.1/ TR-RO-540a.1



a.-b. MOL Group's objective continues to be in the top 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 worker related injuries, covering both employees and those workers who are not MOL Group employees but who work and/or whose workplace is controlled by MOL Group, as prescribed by the GRI Standards.

The full list can be obtained from the Data Library (link below). Furthermore, supportive narrative explaining the causes of fatalities and worker related injuries (covering personal, process, contractor and road safety) during the last reporting period can be obtained from the Annual Report (H&S is on page 125). Supportive narrative also includes actions taken or underway to eliminate hazards and minimize risks. No workers have been excluded from these calculations. <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Furthermore, MOL Group provides worker related injury figures (including supporting explanations) on a quarterly basis through its quarterly earnings reports, under the section "Sustainable Development & HSE Highlights". Quarterly capital markets communication materials can be obtained through the following link: <https://molgroup.info/en/investor-relations/publications#nav-quarterly-reports>

c.-d. In order to avoid all work-related injury and ill health cases, irrespectively on their nature and possible consequence, MOL Group companies determine and evaluate all risks and hazards with potential effect on their employees' and contractors' health and safety, eliminating them through dedicated actions (refer to GRI 403-2 a.). There is no difference in determination and evaluation of risks and hazards, irrespectively on their nature and possible consequence within MOL Group companies. Some examples can be found regularly in AR's Personal safety, Contractor safety and Road safety parts (e.g. LSR, safety trainings – e.g. eSMILE in Retail –, Contractor safety program, On-site inspection project, Supplier qualification program and in the last two years Covid relevant actions as well).

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

f. No workers have been excluded.

g. Methodology for calculation is found in the Mol Group reporting handbook:

h. MOL Group provides disclosure of a number of new metrics in the group-wide Data Library, as below. Link and name of indicator as the bottom of the page.

-Fatalities further broken down for both own-staff and contractors in Downstream into Downstream Production (Refining & Petrochemicals, and Logistics), as well as Consumer Services (Retail).

-Fatal Accident Rate provided for both Downstream and Upstream for both own-staff and contractors.

-TRIR has been broken down by main division, including Upstream, Downstream Production (Refining & Petrochemicals), Logistics and Retail.

-Lost Time Injury Frequency has been further broken down to include the Consumer Services divisions.

-HAZMAT and Non-HAZMAT Transportation Road Accident Rate for the Group.

Worked hours are also collected covering both employees and those workers who are not MOL Group employees but who work and/or whose workplace is controlled by MOL Group (contractors), as basis of different event rate/frequency calculations.

PARTIAL REPORTING EXPLANATION: 303-9-a-ii.; 303-9-a-v.; 303-9-b-ii.; 309-b-v.; 309-c-i. not disclosed

MOL Group does monitor and register the total number of hours worked, used as the basis for the calculation. Nonetheless, MOL Group does not disclose number of worked hours as prescribed by the GRI Standards. However, reasonable assurance has been provided by the external auditor for the Total Recordable Injury Rate for own employees (includes worked hours*) in line with GRI requirements. Refer to the "Independent Practitioner's Assurance Report" inside the Annual Report for further information (first link above). Disclosure of hours worked is under consideration.

Worked hours (own staff) definition from HSE Planning, Target Setting & Reporting Handbook: the actual hours worked, including overtime hours, recorded in the Company systems. Holidays and (unpaid) leaves are excluded. A timesheet system can be used if it provides reliable worked hours, instead of the calculation method. Notes: All working hours should be included during which the employer is responsible in case of any injury. If the injury of a given person would be considered work-related, he/she should be included in the reporting. The indicator is provided by the HR department.

The number and rate of high-consequence work-related injuries, in the MOL's system the Severity 3 classified events cover this category, but we don't report these cases and their frequency as separated category.

SUPPORTING DATA

YES

NAME OF INDICATOR

Multiple Indicators incl. Fatalities, LTI, LTIF, TRIR, TROIF, LDR and AR

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HEALTH & SAFETY



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

403

OCCUPATIONAL HEALTH AND SAFETY

403-10

Work-related ill health

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

132, 134



EM-EP-320a.1/ RT-CH-320a.2



3 8



- a. MOL Group did not register any occupational illnesses during 2021. Information can be found in the Annual Report. <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>
 - i. The number of fatalities as a result of work-related ill health: 0
 - ii. The number of cases of recordable work-related ill health: 0
 - iii. The main types of work-related ill health: 0
- b. MOL Group does not record the possible occupational illnesses of contractors (workers who are not employees but provide contracted activities on MOL Group sites), since the management of this is employers' right and task by law.
- c. In order to avoid all work-related ill health cases, irrespectively on their nature, MOL Group companies determine and evaluate all risks and hazards with potential effect on their employees' and contractors' health and safety, eliminating them through dedicated actions (refer to GRI 403-2 a.). Thanks to the conscious approach no work related ill health cases occurred in the last many years. 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.
- d. No own staff workers have been excluded. Contractors are not included, the management of their occupational illness cases (if any) is employers' right and task by law.
- e. Methodology for calculation is found in the Mol Group reporting handbook on the website on page <https://molgroup.info/en/sustainability/our-commitments>

PARTIAL REPORTING EXPLANATION:

MOL Group does not disclose work-related hazards that pose a risk of ill health, indicators 403-10-b, 403-10-c-iii

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

404

TRAINING AND EDUCATION

404-1

Average hours of training per year per employee

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

134



4

5

8

TCFD

MOL Group offers internal and external training programs so that employees throughout the organization can acquire new skills and knowledge, irrespective of gender or employee category (focus of GRI 404-1). The objective is to provide continuous development for colleagues who contribute to the success of the company. Additional information on training and development can be obtained through the following link:

<https://molgroupcareers.info/en/>

<https://molgroupcareers.info/en/working-at-mol-group/our-employees/career-and-development>

Specific information regarding average training hours, total training hours and total training costs per year per employee (incl. employee per category prescribed by the GRI Standards) can be obtained in the Data Library. Furthermore, supporting explanations narrating yearly developments for employee training can be obtained from previous and current Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: 404-1-a-ii not disclosed, as information is not available at this stage

MOL Group does monitor and register the total number of hours of training that the organization's employees have undertaken during the reporting period by gender. However, MOL Group does not disclose this figure as prescribed by the GRI Standards given that MOL Group does not discriminate on neither training hours nor training opportunities based on gender, as is also enshrined in the Group's Code of Ethics and Business Conduct. Disclosure of this indicator is under consideration.

SUPPORTING DATA

YES

NAME OF INDICATOR

Average Hours of Training per Employee Group

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

404

TRAINING AND EDUCATION

404-2

Programs for upgrading employee skills and transition assistance programs

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

133



8



MOL Group offers development programs so that employees throughout the organization can acquire new skills that are necessary for delivering business results. The objective is to provide continuous development for colleagues who contribute to the success of the company and to the long-term strategy. Additional information on career and development can be obtained through the following link:

<https://molgroupcareers.info/en/working-at-mol-group/our-employees/career-and-development>

A comprehensive description of current programs for upgrading employee skills can be obtained through the links below:

- Leadership Development (LEAD): in 2020 5.6% of FTEs (full-time equivalents) participated in the program. <https://molgroupcareers.info/en/working-at-mol-group/our-employees/career-and-development/leadership-development>
- Technical Capability and Career Development: in 2020 15% of FTEs (full-time equivalents) participated in the program. <https://molgroupcareers.info/en/working-at-mol-group/our-employees/career-and-development/technical-professional-development>

The calculation of full-time equivalent (FTE) is an employee's scheduled hours divided by the employer's hours for a full-time workweek.

Furthermore, MOL Group provides supporting explanations narrating the main developments regarding employee skills upgrades in previous and current Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

MOL Group does not systematically (or by default) offer transition assistance programs designed to facilitate continued employability and the management of career endings resulting from retirement or termination of employment. However, depending on the nature, scale and timing of operational changes endings resulting in termination of employment, MOL Group cooperates with local authorities and job fairs in order to provide transition assistance programs in order to facilitate continued employability

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

404

TRAINING AND EDUCATION

404-3

Percentage of employees receiving regular performance and career development reviews

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

129



8



MOL Group offers its employees throughout the organization the possibility of receiving regular performance and career development, irrespective of gender or employee category (focus of GRI 404-3). MOL Group's Annual People Cycle framework is a continuously developed system of processes, methodologies and tools that identify measure and develop employee performance and career management by aligning individual and team objectives with the MOL 2030+ strategic goals. MOL Group continues its efforts to foster an open feedback culture, and to recognize achievements and effort both individual and team levels in order to reach the goal of being the best choice of employees. Beyond formal performance and career development reviews, several campaigns were launched to encourage and motivate employees to give and ask for feedback, resulting in an increasing number of mid-year feedback sessions being incorporated. Beside the performance targets, behaviours are also measured by the Success Principles from 1st January 2021. Additional information on training and development can be obtained through the following link: <https://molgroupcareers.info/en/>

Specific information regarding employees covered by a predefined and standardized performance appraisal process by employee category (as prescribed by the GRI Standards) can be obtained in the Data Library. Furthermore, supporting explanations narrating yearly developments for employees receiving regular performance and career development reviews can be obtained from previous and current Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION:

Requested data are not disclosed by employee category

SUPPORTING DATA

YES

NAME OF INDICATOR

Employees Covered by a Predefined and Standardized Performance Process

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

405

DIVERSITY AND EQUAL OPPORTUNITY

405-1

Diversity of governance bodies and employees

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



5

8



Diversity & Inclusion is a cornerstone of sustaining the strength of international growth by fostering an inclusive culture that leverages diversity as a competitive advantage. MOL Group promotes a culture of diversity, creating an environment that allows a global workforce of diverse backgrounds, experiences and perspectives to contribute to collaboratively achieving results without boundaries. MOL Group fosters equal opportunities for all employees and job applicants, irrespective of race, color, religion, gender, national origin or age. This also enshrined in the Group's Code of Ethics and Business Conduct.

<https://molgroupcareers.info/en/working-at-mol-group/our-employees/diversity-and-inclusion>

<https://molgroup.info/en/working-at-mol-group/our-employees/diversity-and-inclusion/commitments-to-gender-diversity>

MOL Group companies apply and enforce the principle of equal treatment, committed to diversity and equal opportunities at work and promote equal opportunity regarding all its employees. To this effect MOL Plc. prepared equal opportunity plan, and established Equal Opportunity Committee. The purpose of the plan is to define the general principles, requirements, and practices in order to provide equal opportunity.

<https://mol.hu/en/about-mol/ethics-and-compliance/>

https://molgroup.info/storage/documents/case_studies/human_capital/2_iii_equal_opportunity_plan_i.pdf

Information regarding the diversity of governance bodies (disclosed by nationality, gender, age group) and employees (disclosed by region, age, gender) as well as supporting narrative, can be obtained in the Data Library and in previous and current Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

WORKFORCE BREAKDOWN BY NATIONALITY (non-audited data): MOL Group top 5 : Hungarian (40.6%), Croatian (31.6%), Slovakian (15.2%), Bosnian (4.4%), Pakistani (1.81%), and Others (6.4%)

PARTIALLY REPORTING EXPLANATION: 405-1-a and 405-1-b/iii are not disclosed, no available data at the moment

SUPPORTING DATA

YES

NAME OF INDICATOR

Composition of Governance Bodies by Gender, Citizenship and Age Group

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

405

DIVERSITY AND EQUAL OPPORTUNITY

405-2

Ratio of basic salary and remuneration of women to men

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



5 8 10

TCFD

MOL Group fully disclosed the ratio of basic salary and remuneration of women to men. The disclosure includes a) the ratio of the base salary and remuneration of women to men for each employee category, as well as broken down by significant locations of operation. For MOL Group, significant locations of operation include Hungary, Slovakia and Croatia given that the majority of the Groups operations are performed with these three countries. Information regarding the ratio of basic salary and remuneration of women and men can be obtained in the Data Library via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

YES

NAME OF INDICATOR

Rate of Average Base Salary of Women to Average Base Salary of Men in Each Employment Category

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

406

NON-DISCRIMINATION

406-1

Incidents of discrimination and corrective actions taken

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



5 8 16

TCFD

MOL Group is committed to combatting discrimination in all areas of the workplace, throughout our supply chain and in society as a whole. MOL Group's Code of Ethics and Business Conduct section IV.2.2. "Equal Treatment And Opportunities" and the Business Partner Code Of Ethics Section 5. "Avoidance of discrimination" outlines MOL Group's standpoint on discrimination.

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

The number of discrimination related cases/reports can be obtained from the MOL Group Data Library (Ethics and Security sheet) in the link below.

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

PARTIAL REPORTING EXPLANATION: MOL Group does not disclose points

- 406-1-b ii) Remediation plans being implemented, iii) Remediation plans that have been implemented, with results reviewed through routine internal management review processes, iv) Incident no longer subject to action due to confidentiality reasons
- 406-1-a – reported discrimination cases are disclosed, but actual incidents (misconducts) are only reported as total

SUPPORTING DATA

YES

NAME OF INDICATOR

Topics of Ethics Complaints (Whistle-Blower Reports) - Total

LINK

[DATA LIBRARY](#)

EXCEL SHEET

ETHICS-SECURITY-ECONOMIC



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

407

FREEDOM OF ASSOCIATION / COLLECTIVE BARGAINING

407-1

Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8



MOL Group exposure to the right to freedom of association and collective bargaining being at risk is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group recognizes and upholds the freedom of association, the right to form and join a union and the right to collective bargaining. This is included in the Group's Code of Ethics and Business Conduct or CoEBC ((IV.2. Human Rights - IV.2.5.Fair Labour Practices) and rolled out along the supply chain through the MOL Business Partner Code of Ethics or BPCE (Point 2: Human rights).

Group's Code of Ethics and Business Conduct

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

MOL Business Partner Code of Ethics

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Additional Information:

<https://molgroup.info/en/sustainability/ethics-and-governance>

Information regarding the percentage of employees covered by collective agreements and of those with potential to seek representation in trade unions can be obtained from the Data Library and Annual Report via the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

EXPLANATION FOR OMISSION: MOL Group does not disclose 407-1-a-I, II (Types of operations and locations where the employees of the supplier are not covered by collective bargaining) and 407-1-b (Measures taken by the organizations to support this right) due to confidentiality reasons. Disclosure is under consideration

SUPPORTING DATA

YES

NAME OF INDICATOR

Freedom of Association/Employees with Potential Access to Trade Union Membership

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HUMAN CAPITAL



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

408

CHILD LABOR

408-1

Operations and suppliers at significant risk for incidents of child labor

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8

16



MOL Group exposure to the risk of incidents of child labour is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to lawful and fair employment and to respecting labour principles. MOL Group also expects the same from business partners and external stakeholders. MOL Group will not tolerate any form of forced, compulsory, bonded or child labour or any other kind of unethical employment practice such as withholding wages, denying sick leave or daily rest, abuse of alternative employment forms or evasion of health care contributions. We ensure that these forms of labour and slavery, servitude, and human trafficking do not take place within our business and supply chains.

This is included in both the Group's Code of Ethics and Business Conduct or CoEBC (*IV.2. Human Rights - IV.2.5.Fair Labour Practices*), and rolled out along the supply chain through the MOL Business Partner Code of Ethics or BPCE (*Point 2: Human rights*).

Group's Code of Ethics and Business Conduct

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

MOL Business Partner Code of Ethics

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Additional Information:

<https://molgroup.info/en/sustainability/ethics-and-governance>

PARTIAL REPORTING EXPLANATION: indicator 408-1-a and 408-1-b are not disclosed, information unavailable at the moment

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

409

FORCED OR COMPULSORY LABOR

409-1

Operations and suppliers at significant risk for incidents of forced or compulsory labor

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8

16



MOL Group exposure to the risk of forced or compulsory labor 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. We also expect the same from our business partners and external stakeholders. MOL Group will not tolerate any form of forced, compulsory, bonded or child labour or any other kind of unethical employment practice such as withholding wages, denying sick leave or daily rest, abuse of alternative employment forms or evasion of health care contributions. We ensure that these forms of labour and slavery, servitude, and human trafficking do not take place within our business and supply chains.

This is included in the Group's Code of Ethics and Business Conduct or CoEBC (*IV.2.5.Fair Labour Practices*), and rolled out along the supply chain through the MOL Business Partner Code of Ethics or BPCE (*Point 2: Human rights*).

Group's Code of Ethics and Business Conduct

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

MOL Business Partner Code of Ethics

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Additional Information:

<https://molgroup.info/en/sustainability/ethics-and-governance>

PARTIAL REPORTING EXPLANATION: 409-1-a not disclosed – information unavailable

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

RIGHTS OF INDIGENOUS PEOPLES

OG-9

Operations where indigenous communities are present or affected by activities and where specific engagement strategies are in place

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-210a.3 / RT-CH-210a.1



10



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 411-1

MOL Group operations (GRI 102-4) are neither located in or are adjacent to indigenous peoples' communities. As a result, MOL Group does not operate sites where indigenous communities are present and therefore affected by MOL Group activities. Consequently, no specific engagement strategies are in place. Nonetheless, MOL Group's modus operandi ensures the safeguarding of the rights of tribal populations and indigenous people. MOL Group is committed to gaining free prior and informed consent in the event that indigenous people should be relocated from their land. So far, no resettlements have occurred at any of our international operating locations.,,

MOL Group's understanding of indigenous people is aligned with the UN definition: http://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

410

SECURITY PRACTICES

410-1

Security personnel trained in human rights policies or procedures

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

129



EM-EP-210a.3



10



MOL Group exposure to the risk of human right of violations is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to respecting fundamental human rights, a principle which is also included in both the Group's Code of Ethics and Business Conduct or CoEBC (IV.2. Human Rights), and rolled out along the supply chain through the MOL Business Partner Code of Ethics or BPCE (Point 2: Human rights). Security personnel trained in human rights policies or procedures takes place in Russia and Pakistan where MOL employs security personnel.

Group's Code of Ethics and Business Conduct

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

MOL Business Partner Code of Ethics

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Information regarding MOL Group's human rights training to security personnel can be obtained in the annual report page 129:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Additional Information:

<https://molgroup.info/en/sustainability/ethics-and-governance>

AUDIT AND ASSESSMENT OF SECURITY CONTRACTORS: MOL Group performs two types of audits for its security forces: 1) a self "daily - monthly evaluation" performed by the Service Provider. It is under the responsibility of Service Provider to evaluate every security guard on duty on the given day by using the "Daily - Monthly Evaluation sheet", which is subsequently sent to the MOL Group Regional Security Manager for evaluation, applying a three rating system is used to evaluate performance of security guards. 2) On top of the self-evaluation, a "Monthly Evaluation" assessing the work of security forces is performed by the MOL Region Security Leader, as well as "a "Monthly Fluctuation" report by the Region Security Leader. Finally, a "Summarize Valuation" to the Country Manager is performed by Region Security Leaders.

REASON FOR OMISSION. GRI standard required data not available at the moment for this indicator

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

LOCAL COMMUNITIES

OG-10

Number and description of significant disputes with local communities and Indigenous people

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

136



RT-CH-210a.1



10

11



MOL Group operations are neither located in or are adjacent to indigenous people. As a result, MOL Group does not operate sites where indigenous communities are present and therefore affected by MOL Group activities. Consequently, no disputes with indigenous people are currently registered.

Due to its scale and footprint, MOL Group operations may have impacts that result in disputes with local communities. These are often raised through grievance mechanisms. As an element of community engagement, MOL Group also focuses on managing grievances. MOL Group considers each grievance notification from a community to be significant. To receive and manage grievances from both internal and external stakeholders, an online grievance management system is operated through which anybody can submit an ethical notification. MOL Group Compliance & Ethics department operates a corporate grievance mechanism under the coordination of the Group Ethics Officer and according to the Ethics Council Rules of procedure whereas questions are answered, complaints are investigated and the Ethics Council assesses the raised issues. Description of the Ethics Grievance Channel, and the MOL Group "Speak-Up" whistleblower system can be obtained via the links below:

<https://molgroup.info/en/sustainability/ethics-and-governance>

<https://molgroup.info/en/about-mol-group/speak-up>

MOL Group discloses the number of grievances and outcome per location. Furthermore, MOL Group provides supporting description concerning significant disputes with local communities (including environmental and land related) and the outcome in its Annual Report. Both can be obtained through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

YES

NAME OF INDICATOR

Total Number of Grievances from Local Communities (NEW INDICATOR INTRODUCED IN 2019)

LINK

[DATA LIBRARY](#)

EXCEL SHEET

COMMUNITIES



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

411

RIGHTS OF INDIGENOUS PEOPLES

411-1

Incidents of violations involving rights of indigenous peoples

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-210a.3 / RT-CH-210a.1



10



MOL Group is a mid-sized oil and gas company, with the majority of operations concentrated in and around Central Europe (GRI 102-4). MOL Group CEE operations or its International Upstream operations are neither located in or are adjacent to indigenous peoples' communities. As a result, MOL Group is not engaged in activities which may either affect indigenous people or incur into violations involving the rights of indigenous people.

MOL Group understanding of indigenous people is aligned with the UN definition: http://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf

Additionally, MOL Group considers as indigenous people communities those who are limited in exercising their rights to protect their land against investors. In MOL Group's view, communities in the EU have such rights. MOL Group's assessment did not identify such communities in Pakistan, Kurdistan or Kazakhstan.

MOL HSE Management System includes section XVI. Social Impacts: *Plan for management and mitigation of risks: At least the following negative impacts must be assessed and managed: including, a) impact on health, safety and general living conditions of the local communities – any disproportionate negative impact must be avoided; b) resettlement of local communities – involuntary resettlement (physical and economic) must be avoided in all reasonable cases; c) impact on indigenous people – prior and informed consent of such groups must be gained; d. Impact on cultural heritages, traditional landscapes.*

https://molgroup.info/en/show/sustainability/hse_management_system_2018.pdf

Furthermore, MOL Group Code of Ethics and Business Conduct also provides for the protection of indigenous people affected by MOL Group operations, under section IV.2. Human rights (*We assure the respect of human rights by assessing the impact of our actions. We place a special focus on our workers, suppliers and local communities as well as on vulnerable groups of indigenous people, women, national or ethnic, religious and linguistic minorities, children, persons with disabilities and migrant workers and their families. We ensure the safeguarding of the rights of tribal populations and indigenous people affected by our operations including refraining from forced relocation. We place a particular focus on the security service providers who act on behalf of MOL Group, in order to prevent any human rights violations during the performance of their activities.*

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

LOCAL COMMUNITIES

OG-11

Number of sites that have been decommissioned and sites that are in the process of being decommissioned.

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



RT-CH-210a.1



11



EXPLANATION FOR OMISSION: MOL Group does not disclose comprehensive information because of confidentiality constraints.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

412

HUMAN RIGHTS ASSESSMENT

412-1

Operations that have been subject to human rights reviews or impact assessments

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

131



10



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. MOL Group strives to implement them into our every day business operations:

<https://molgroup.info/en/sustainability/ethics-and-governance>

MOL Group exposure to the risk of human right of violation is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to respecting fundamental human rights, a principle which is also included in the Group's Code of Ethics and Business Conduct, and which is rolled out along the supply chain through the MOL Business Partner Code of Ethics (links below).

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

EXPLANATION FOR OMISSION : Country breakdown for the 53 sites is not disclosed at this stage, internal policies ,procedures and additional resources are currently under revision.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

412

HUMAN RIGHTS ASSESSMENT

412-2

Employee training on human rights policies or procedures

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

134,
137



10



MOL Group exposure to the risk of human right of violation is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to respecting fundamental human rights, a principle which is also included in the Group's Code of Ethics and Business Conduct, and which is rolled out along the supply chain through the MOL Business Partner Code of Ethics (links below).

Human rights related training is covered by the yearly, mandatory Code of Ethics training, completed by 99% of MOL employees in 2021.

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Data and supportive narrative concerning MOL Group human rights training can be obtained in past and current Annual Reports via the link below:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 131. and 136.)

PARTIAL REPORTING EXPLANATION: 412-2-A not disclosed, information unavailbel

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

412

HUMAN RIGHTS ASSESSMENT

412-3

Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



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MOL Group exposure to the risk of human right of violation is relatively minor given that most of the Group's activities are performed in European countries. Nevertheless, MOL Group is committed to respecting fundamental human rights, a principle which is also included in the Group's Code of Ethics and Business Conduct, and which is rolled out along the supply chain through the MOL Business Partner Code of Ethics (links below).

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

Data and supportive narrative concerning significant investment agreements (under which we mean supplier contracts, service station operator partner contracts, sponsorship and corporate giving contracts) and clauses or that include human rights clauses or that underwent human rights screening can be obtained in past and current Data Library (Ethics and Security sheet) and the Annual Report via the link below :

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

REASON FOR OMISSION: GRI STANDARD data are not available at the moment, disclosure under discussion

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

SOCIOECONOMIC COMPLIANCE

OG-12

Operations where involuntary resettlement took place, number of household resettled and how livelihood was affected in the process

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-210a.3



10

11



According to policy MOL Group avoids involuntary resettlement to the extent feasible, or to minimize and mitigate its adverse social and economic impacts. Where avoidance is not feasible, the key objective is to assist displaced households in their efforts to improve or at least restore their incomes and standards of living following displacement. The policy also covers direct economic and social impacts caused by a) the involuntary taking of land resulting in relocation or loss of shelter, loss of assets or access to assets; or loss of income sources or means of livelihood, whether or not the affected persons must move to another location; and (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons.

Development projects must seek to avoid involuntary resettlement. However, if an activity entails involuntary resettlement of households, the project must follow resettlement policy requirements. The actions to be taken to process the resettlement component of projects fall into three categories:

I. Preparing the resettlement component: Surveys of the project area to obtain census and socioeconomic data; Finalizing resettlement entitlements; Identifying resettlement sites and programs; Coordinate organizations / agencies to deliver resettlement assistance; and Devising budgets and plans for implementing and monitoring the resettlement activity.

II. Preparing the resettlement planning documents: coordinate with all agencies involved to develop the required planning document; determine the type of resettlement planning documents required; have resettlement plans agreed with affecting communities; and have plans reviewed and approved by relevant organisation/agencies

III. Developing systems for supervising and monitoring implementation: take steps to ensure that implementation arrangements are adequate; and arrange for internal and external resettlement monitoring during implementation.

No displacements were made during 2021.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

413

LOCAL COMMUNITIES

413-1

Operations with local community engagement, impact assessments, and development programs

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

136



RT-CH-210a.1



10

11



Due to its scale and footprint, MOL Group operations may affect communities. This effect on communities can both be positive (providing work and wages, paying taxes, investing in the community etc.) and negative (emissions, environmental impact, human rights violations, unethical behaviour, unsafe work etc.). The oil and gas industry is under particular scrutiny as operations may pose potential health, safety and environmental risks. Consequently, MOL Group faces the challenging and - if done appropriately - rewarding task of obtaining a "license to operate" in the communities where it operates. MOL Group established a Community Engagement Group Principle (link below) that allows for identification, anticipation and, where possible, control of the effects of stakeholder actions and reactions. A pilot project for the Community Engagement Group Principle took place in 2018 (additional information can be obtained in the 2018 Annual Report). The Group Principle was applied in MOL Petrochemicals site in Tiszaujvaros (Hungary) in 2018. Based on the evaluation, the programme was extended to the Danube Refinery during 2019 (additional information can be obtained in the 2019 Annual Report - link below). Extension of the scope is under reconciliation.

PARTIAL REPORTING EXPLANATION: Percentage of operations with local community engagement and the number of development projects not disclosed as prescribed by the GRI Standards as this is not yet applicable. <https://molgroup.info/en/sustainability/communities> / <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

All development projects/production assets are under community consultation involving at any point in time one or more of the following affected communities: individuals, businesses, communities, local government authorities, local non-governmental and other institutions, local government officials, community leaders and civil society organizations. Example: MOL Pakistan, operates through a comprehensive community management approach with a community development function that is responsible for timely engagement with local communities in areas of impacted by operations. MOL Pakistan has a Community Relations Officer (CRO) function that engages with the local impacted community in advance. The CRO is available 24/7 in the operational area. In case of any violation, the CRO reports the incidence to the company and meets with local communities to discuss and resolve the issue in due time. CROs are all hired locally, and belong to the same communities. Before moving in, a socio-economic profile of the area is compiled, including a social impact assessment. During the course of engagement, focus group discussions are held with the communities, wherein the first dialogue is held with the elders of the area (as per local custom), including influential stakeholders. These discussions are followed by "awareness raising sessions", highlighting local issues and potential impact, with possible redressal measures proposed, including development plans for the area concerned. Prior start, all operations are cleared by the relevant government and regulatory authorities. All possible social and environmental impacts are pre-assessed by the relevant regulatory authorities, including Environmental Impact Assessments and open, public sessions with the relevant/associated communities

ENVIRONMENTAL IMPACT ASSESSMENT (EIA): all HSE relevant project proposals (IPPs - Investment Project Proposal) have an HSE chapter where all aspects of project are elaborated (what are the benefits for environment by project implementation). Also, after project implementation, a Post Evaluation Report is prepared where project are evaluated (goals are achieved or not). For Upstream sites, an agroecological studies are prepared in order to check the environmental status before and after drilling/exploration & production/operational activities. In line with legal obligations (legal framework in Croatia), if project can have impact on environment, an Environmental Elaborate or Environmental Impact Assessment Study has to be prepared (depends on the type and scope of project) by authorized company and approved by the Environmental Authority. During this approval process, a study summary is available to public for commenting. Recommendations are implemented, followed up, reported and inspected by the environmental inspection.

Due to the sensitive content of EIAs (legal requirement), the actual complete assessments might not be publicly available. But local authorities, upon valid request from relevant stakeholders, always hand out the assessments which are only available in local languages. Proof that the proceedings took place:

- For Hungary the proof of proceedings can be found on the county websites (in Hungarian), for example: [Borsod-Abaúj-Zemplén \(for MPC\)](#), [Bács-Kiskun \(E&P\)](#), [Vas \(E&P\)](#)
- For Slovakia please see the [Slovakian public EIA register](#)
- For Croatia please see the website of the [Croatian Ministry of Economy and Sustainable Development](#)

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

413

LOCAL COMMUNITIES

413-2

Operations with significant actual and potential negative impacts on local communities

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

136



RT-CH-210a.1/ EM-EP-210a.3/ ER-RM-120a.2



10

11



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-4

MOL Group's Social Engagement Group Practice sets the criteria, steps and methodologies to follow in establishing a relationship with the communities based on the Principles of Engagement in harmony with AA1000 Stakeholder Engagement Standard 2011. In case of major projects affecting a wider society in the place of operation a Social Investment (SI) programme design should be carried out. The SI programme planning occurs simultaneously with the business project design itself. Based on the methodology defined in The Social Engagement Group Practice, before decision on an investment or abandonment project proposal sites/operations shall carry out a Social Impact Assessment (SIA) 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

Social Investment priorities shall be aligned with the oil and gas project development timeline to provide the biggest contribution to the Company in each particular phase of the project cycle. Engagement of local community members' (individuals, opinion leaders, non-profit organizations, municipalities, associations etc.) towards the Company must constantly be ensured during operational activities that has effect on the local communities. The engagement process supports the achievement of MOL Group's business success and strategic objectives by establishing high quality partnerships through: identification of stakeholders, resolving issues of stakeholders (through interaction, consensus-based decisions, collaborative solutions etc). In all projects, operations, and also in the event of site abandonments which has significant social impact on the local community the process must be carried out at the earliest phase possible. MOL Group works together with public authorities and social organizations to identify the expectations, needs and aspirations of the communities surrounding our facilities. The lines of action of MOL Group in terms of social commitment are intended to respond to the needs identified in communities, and are based on the criteria of giving the community the capacity to develop itself. MOL Group uses the London Benchmarking Group (LBG) methodology.

MOL Group provides data on the number of grievances (incl. environmental grievances) in the Data Library. Furthermore, MOL Group provides a yearly update on the operations with significant negative impacts on local communities in its Annual Report. Both can be obtained in the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

SOCIOECONOMIC COMPLIANCE

OG-13

Number of process safety events by business activity

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

128



EM-RM-540a.1/EM-EP-540a.1



3

8

11

TCFD

The main goal of process safety management (PSM) is to establish and operate an efficient system which ensures the prevention of technology-related process incidents (leakages, fires, explosions, etc.) and protects people, assets and environment against harm. Implementation of a process safety management in MOL Group started back in 2006. MOL Group's PSM-related goal is to continuously decrease the number and severity of process incidents and be in the top 25 percentile of CONCAWE and IOGP benchmarks. MOL Group PSM requirements are incorporated in the highest-level document – HSE Management System and relevant businesses are required to comply with these requirements.

https://molgroup.info/en/show/sustainability/hse_management_system_2018.pdf

Number of process safety events and supportive narrative explaining the main causes can be obtained at the Data Library and the Annual Report – page number 132:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Furthermore, MOL Group provides PSE related figures (including supporting explanations) on a quarterly basis through its Quarterly Earnings Reports, under the section *SUSTAINABLE DEVELOPMENT & HSE HIGHLIGHTS*. Quarterly capital markets communication materials can be obtained through the following link:

<https://molgroup.info/en/investor-relations/publications#nav-quarterly-reports>

Number of Tier 1 Process Safety Events Number per million hours worked was: 0.15 (FY 2015), 0.31 (FY 2016), 0.17 (FY 2017), 0.21 (FY 2018) and 0.13 (FY 2019), 0,35 (FY 2020), 0,27 (FY 2021).

Note: TIER 1 PSE monetary threshold (USD100.000 for fire/explosions) is used based on the definition of "American Petroleum Institute (API), Recommended Practice 754: Process Safety Performance Indicators For The Refining And Petrochemical Industries" - valid from 2016.

SUPPORTING DATA

YES

NAME OF INDICATOR

TIER 1 Process Safety Events/TIER 2 Process Safety Events/TIER 1+2 Process Safety Events

LINK

[DATA LIBRARY](#)

EXCEL SHEET

HEALTH & SAFETY



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

414

SUPPLIER SOCIAL ASSESSMENT

414-1

New suppliers that were screened using social criteria

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8

12



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-9 (SUPPLY CHAIN) AND GRI 204-1 (LOCAL SUPPLIERS)

MOL Group introduced SAP Ariba as a group-level, integrated system that deals with all supplier-related information, from the qualification phase to the contracting stage. This system include automated assessment of risks associated with suppliers based on legal, ethical, financial, health and safety, as well as environmentally related data and documentation. It also facilitates the supplier pre-qualification process. In 2018 contractor post evaluation system has been implemented to support contractor performance evaluation.

SAP Ariba: [LINK](#)

Supplier Qualification Process: [LINK](#)

It is obligatory for all new suppliers to be screened using a number of social criteria (defined as ethical, health and safety). As a result, all new suppliers (100%) were screened using social criteria during 2020. Furthermore, all new suppliers must sign and act according to both the Code of Ethics and Business Conduct as well as Business Partner Code Of Ethics. Supporting narrative under the Ethics chapter of the Annual Report regarding ethics coverage in supplier contracts:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf

https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

414

SUPPLIER SOCIAL ASSESSMENT

414-2

Negative social impacts in the supply chain and actions taken

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



8

TCFD

REASON FOR OMISSION: MOL Group conducts HSE evaluation for all contractors., however does not have a proven practice for reporting the GRI requested detailes. Disclosure under discussion

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

OG

SOCIOECONOMIC COMPLIANCE

OG-14

Volume of biofuels produced and purchased meeting sustainability criteria

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-410a.2



7

13

15



TO BE READ AND UNDERSTOOD IN CONNECTION WITH 305-3 "OTHER INDIRECT (SCOPE 3) GHG EMISSIONS"

During 2021 MOL Group purchased and blended more than 750 million liters of biofuels (bioethanol and biodiesel) in 8 countries. Besides, after launching the co-processing of waste fats and oils in MOL's Danube Refinery in 2020 (and by doing so becoming a biofuel producer) decarbonisation of the fuel portfolio was continued in 2021 by adding such biological originated molecules on a regular basis. Similar projects are under assessment in our Slovakian (Slovnaft a.s.) and Croatian (INA d.d.) refineries.

On top of this activity final grade Hydrogenated Vegetable Oil (HVO) was also blended in the Bratislava refinery.

2021 was the second year when some of our core markets – Hungary, Slovakia, Romania – distributed E10 gasoline which has been the standard main grade petrol ever since. In order to further improve the ecological footprint of our fuels MOL started to produce bio MTBE made of advanced biomethanol. This is another important milestone to meet the goals of MOL Group's new 'Shape tomorrow - 2030+ Strategy'.

The bio-components purchased in 2021 comply with the requirements of the EU Renewable Energy Directive. MOL Group companies (MOL Plc., Slovnaft and INA) comply with the European ISCC (International Sustainability and Carbon Certification System) as distributors. ISCC certifies the entire supply chain of bio-based feedstocks and renewables to ensure the application of strict ecological and social sustainability standards, greenhouse gas emissions savings and traceability throughout the supply chain. In 2021 MOL Plc. and Slovnaft also obtained REDCert certification.

More information can be obtained through the following links:

<https://molgroup.info/en/sustainability/climate-change>

<https://slovnaft.sk/en/about-us/sustainable-development-and-hse/climate-change/research-and-development/biofuels-for-gasoline-and-diesel-engines/>

<https://www.rossibiofuel.hu/en/>

<https://www.meroco.sk/en/>

PARTIAL REPORTING EXPLANATION: In 2020 MOL began producing own biofuel which nearly doubled in volume in 2021. MOL has ISCC certification for the unit where bio-feedstock is co-processed. All produced volume meets sustainability criteria (as well as used feedstock). MOL has no land under direct production for the respective or any other biofuel feedstock feedstock.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

415

PUBLIC POLICY

415-1

Political contributions

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-EP-530a.1



16

TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 102-12 AND 102-13

MOL Group has adopted a political activity policy which provides that the company and its affiliates do not, and will not make political contributions or use any corporate funds or assets for any candidates or political parties.

MOL Group, as a leading oil and gas company, plays an active role in a number of trade, industry and professional associations across the European Union. Participation of MOL Group in any trade, industry and/or professional association is coordinated through, and approved in advance by, MOL Group Corporate Affairs Department. MOL Group membership list can be obtained in the link below.

<https://molgroup.info/en/sustainability/our-commitments>

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

416

CUSTOMER HEALTH AND SAFETY

416-1

Assessment of the health and safety impacts of product and service categories

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



CG-MR-410a.2



12



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 416-2

a. MOL Group is continuously assessing substances that are used by consumers which may have harmful effects on human health or the environment (substances classified as carcinogenic, mutagenic and reproductive toxic – CMR; persistent, bio-accumulative and toxic – PBT; or very persistent or very bio-accumulative – vPvB) or have physical hazards (Flammability, Explosiveness, etc.) within the frame of Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Regulation. Declarations of compliance with REACH, as well as the relevant safety data sheets, are available on the following websites:

- MOL Hungary: <http://reach.mol.hu>
- MOL Petrochemicals: <https://www.molgroupchemicals.com/>
- MOL Hungary: <https://mol.hu/en/polymers/certificates>
- MOL-LUB: www.mol.hu/hu/kenoanyag-es-autoapolas
- Slovnaft: <https://slovnaft.sk/en/about-us/sustainable-development-and-hse/health-and-safety/reach/>
- INA: <https://www.ina.hr/en/home/customers/products-and-services/safe-management-of-product/safety-data-sheets/>
- INA MAZIVA: <https://www.ina-maziva.hr/sigurnosno-tehnicki-listovi-s39>
- IES: www.molgroupitaly.it/it/prodotti-e-servizi/prodotti-petroliferi/benzine-e-gasoli

MOL Group is continuously updating the REACH dossiers. The submitted and updated information will inform customers about the product and their impact on human health and the environment via safety data sheets. MOL Group is committed to follow the updates of the Candidate List of Substances of Very High Concern, and based on actual knowledge, the products manufactured in MOL Group Refineries do not contain (no intentional blending) any of the 223 substances listed on the Candidate List.

REASON FOR OMISSION: MOL Group does not disclose the percentage of significant product/service categories for which health and safety impacts are assessed for improvement as prescribed by the GRI Standards.

EU GREEN DEAL: One of the heading strategy in the EU Green Deal, is the Chemicals Strategy for Sustainability. According to this strategy, as per- and polyfluoroalkyl substances (PFAS) are classified as persistent, bioaccumulative and toxic (PBT), is going to be phased out from the market from 2025. Similar substances, the perfluorooctanoic acid (PFOA) is already restricted (derogation time 2023) , and restriction of undecafluorohexanoic acid (PFHxA), its salts and related substances is ongoing. Around 1100 m3 firefighting foam contains the above mentioned substances in MOL Group. As part of the Group HSE strategy 2021-2025 MOL Group will initiate the foam strategy to prepare the affected organizations to the regulative changes and also fulfil MOL Group's commitment to sustainability.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

416

CUSTOMER HEALTH AND SAFETY

416-2

Incidents of non-compliance concerning the health and safety impacts of products and services

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



12



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 416-1

a.-b. During 2021, MOL Group did not register any incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services in neither MOL Refining, MOL Petrochemicals, MOL Lubricants, Slovnaft or INA Group.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

417

MARKETING AND LABELLING

417-1

Requirements for product and service information and labeling

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



SV-AD-220a.1



12



Given the integrated nature of MOL Group, it is subject to a number of requirements for its product and service information, and labelling within petrochemicals and lubricants (Downstream), fuel and non-fuel products (Consumer Services). All products are covered by and assessed for compliance.

REFINING AND PETROCHEMICALS: MOL Group provides transparent information about the HSE impacts of products by giving the SDS (safety data sheet). MOL Group prepares Safety Data Sheets not only for products classified as hazardous, which is mandatory according to 1907/2006/EC (REACH) Regulation, but for the not classified products as well. Although polymers are not classified as hazardous, SDS complies with the current Regulations as well. All of our products are classified according to CLP (Classification, Labelling and Packaging) Regulation, which is a European Union regulation aligning EU system of classification, labelling and packaging of chemical substances and mixtures to the Globally Harmonized System (GHS). SDS includes information on the safe use of a product, the disposal of the product, or the sourcing of its components. MOL Group immediately updates its manufacturer's statement as soon as the SVHC (Substances of Very High Concern) list changes. Access to this information helps customers to make informed purchasing choices.

Link : <https://www.molgroupchemicals.com/articles/1/catalogues-certificates>

LUBRICANTS: Front labels of MOL Group lubricants and auto chemicals contain brand name, product category, benefit and hint for application. Back labels contain all other information according to legal requirements. MOL Group Lubricant prepares its back labels taking into account current regulatory requirements. The back label elements are identical as those written under the MSDS. The back label includes product name, use, dangerous elements, shelf life, production time, batch number and hazard pictogram, if applicable EUH, H, P phrases. These phrases refer to dangers in relation to the use of the product, describing precautionary measures in case of accident ("H" "hazard statement" or "P" for "precautionary statement"). MOL Group Lubricants has presence in nearly 50 countries around the world. Obligatory texts can be written in ~24 languages. If a country has particular regulations MOL Groups completes the text with special requirements.

Link: <https://mol.hu/en/for-the-business/chemicals/base-oils/>

FUEL: Fuel labelling is regulated by the European law. Four elements must to appear on the fuel stickers: fuel octane, fuel type, quality description, ID sign, as brand name is optional. MOL Group is in compliance with all EU legislation on fuel product and service information and labelling

NON-FUEL: As a result of the 2030 strategy and the introduction of the Fresh Corner concept at service stations, MOL Group places increasing emphasis on information and labelling for own-products. MOL Group is in compliance with EU as well with local legislation on the matter.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

417

MARKETING AND LABELLING

417-2

Incidents of non-compliance concerning product and service information and labelling

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



SV-AD-220a.3



12



Given the integrated nature of MOL Group's oil & gas operations, MOL Group is subject to a number of Requirements for product and service information and labelling within petrochemicals and lubricants (Downstream), as well as fuel and non-fuel products (Consumer Services). MOL Group tracks any incident of non-compliance concerning product and service information and labelling. Below an overview of all four areas:

REFINING AND PETROCHEMICALS: No incidents of non-compliance concerning product and service information and labelling were recorded during 2020.

LUBRICANTS: No incidents of non-compliance concerning product and service information and labelling were recorded during 2020.

FUEL: No incidents of non-compliance concerning product and service information and labelling were registered during 2020.

NON-FUEL: No incidents of non-compliance concerning product and service information and labelling were registered during 2020.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

417

MARKETING AND LABELLING

417-3

Incidents of non-compliance concerning marketing communications

REPORTING

FULLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



SV-AD-270a.1



12



In order to avoid misleading advertising, MOL Group thoroughly examines the intelligibility of the messages it seeks to convey. Most commonly, this means doing research with focus groups, where participants are able to express their opinions and insights about particular messages and visuals. MOL Group uses this method at the early and mid-phases of developing advertisements so as to obtain continuous feedback about how understandable and clear the messages MOL Group wants to communicate. In addition, all communication materials are checked by the Legal department - both at the Group level and locally in countries where MOL Group operates - before they are released to the public. This process promotes more responsible advertising.

No incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications were recorded during 2020, including:

- i) no incidents of non-compliance with regulations resulting in a fine or penalty were registered;
- ii) no incidents of non-compliance with regulations resulting in a warning were registered;
- iii) no incidents of non-compliance with voluntary codes were registered.

One open process regarding a promotion is with the Hungarian Competition Authority, but no penalties incurred.

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102



GRI 103



GRI 200



GRI 300



GRI 400

GENERAL DISCLOSURES

MANAGEMENT APPROACH

ECONOMIC

ENVIRONMENTAL

SOCIAL

418

CUSTOMER PRIVACY

418-1

Substantiated complaints concerning breaches of customer privacy and losses of customer data

REPORTING

OMITTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



CG-MR-230a.1/ CG-MR-230a.2



16



Protection of personal data is of key importance for MOL Group. MOL Group companies are responsible for ensuring compliance with all applicable data protection requirements when processing personal data. MOL Group is committed to conducting its business in accordance with all applicable data protection laws and regulations especially with the GDPR and in line with the highest standards of ethical conduct.

Information regarding 2021 focus and results (incl. especial emphasis on GDPR), can be obtained at the Annual Report:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Further information can be obtained via the below links:

<https://molgroup.info/en/sustainability/ethics-and-governance>

<https://molgroup.info/en/privacy-policy>

<https://molgroup.info/en/about-mol-group/recruitment-privacy-statement>

https://www.mollimo.hu/pdf/EN/privacy_policy_on_the_processing_of_certain_personal_data_generated_in_the_course_of_using_car_sharing_services.pdf

REASON FOR OMISSION: MOL Group does not publish the requested data, information not available

SUPPORTING DATA

N/A

NAME OF INDICATOR

N/A

LINK

N/A

EXCEL SHEET

N/A



GRI 102

GENERAL DISCLOSURES



GRI 103

MANAGEMENT APPROACH



GRI 200

ECONOMIC



GRI 300

ENVIRONMENTAL



GRI 400

SOCIAL

419

SOCIOECONOMIC COMPLIANCE

419-1

Non-compliance with laws and regulations in the social and economic area

REPORTING

PARTLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



EM-RM-520a.1/EM-EP-520a.1



16



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, behavioral remedies etc.). Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing trainings to increase awareness. Compliance activity has the following attributes which are essential to implement MOL Group's Compliance Plan successfully:

Group Compliance has its dedicated experts

Credible: in-house investigations aiming at tracking compliance with internal and external commitments

Authorized: all employees of MOL Group are obliged to support the operation of Compliance Plan and activities of the compliance teams

Awareness-oriented: trainings aiming at increasing knowledge about compliant conduct

Any anti-competitive proceedings are notified to Group Legal and Compliance unit. During 2021, MOL Group was not subject to any fines or settlements related to 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 2021.

PARTIAL REPORTING EXPLANATION: MOL Group discloses significant fines (HSE penalties and anti-competitive fines), however does not disclose the context against which significant fines and non-monetary sanctions were incurred.

SUPPORTING DATA

YES

NAME OF INDICATOR

Anti-competitive fines, HSE Penalties

LINK

[DATA LIBRARY](#)

EXCEL SHEET

Ethics, Security, Economy

GRI REPORTING TABLE: **DISCLAIMER**

Certain information set forth in this presentation contains "forward-looking information". All statements, other than statements of historical fact, are forward-looking statements. Such forward-looking statements necessarily involve known and unknown risks and uncertainties, which may cause actual performance and financial results in future periods to differ materially from any projections of future performance or result expressed or implied by such forward-looking statements. As a result, these statements are not guarantees of future performance and undue reliance should not be placed on them.

The information in this presentation, in accordance with the Global Reporting Initiative (GRI) framework, is shared based on the best available data at the date of publication. In some cases where measurement results were not available the data disclosed is based on estimation. While the information is considered to be true and correct at the date of publication, changes in circumstances after the time of publication may impact on the accuracy of the information. The information may change without notice. In some cases, the data related to the indicators presented in this report does not form part of the document itself. In such cases the data can be found either in the annual report or in the data library of MOL group. These reports altogether form the sustainability reporting of MOL group and must be read together for complete understanding of sustainability performance.

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