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# MOL GROUP 2023 GRI REPORTING TABLE


24 APRIL 2024

Index ▲ 1.56

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# GRI REPORTING TABLE: DESCRIPTION

1  → **GRI 2** GENERAL DISCLOSURES → GRI 3 MATERIAL TOPICS → GRI 200 ECONOMIC → GRI 300 ENVIRONMENTAL → GRI 400 SOCIAL → GRI 11 OIL&GAS

2 **2** THE ORGANISATION AND ITS REPORTING PRACTICES

3 **2-1** Organisational details

4 REPORTING  EXTERNAL ASSURANCE  ANNUAL REPORT PAGE  /  5  

4 The name of the organisation is MOL Magyar Olaj- és Gázipari Nyrt. (henceforth MOL Group) headquartered in Dombóvári út 28, 1117 Hungary. More information can be found through the following link:  
<https://molgroup.info/en/contact-us>

Detailed information about the nature of MOL's ownership and legal form can be obtained through the following links and from the Annual Report, as well as from capital markets communication materials which are updated on a regular basis:  
<https://molgroup.info/en/investor-relations/mol-shares>

6 Visual description of MOL's location of operations can be found in the links below and in the Investor Relations Presentation. MOL Group has production activities in 10 – Hungary, Croatia, Romania, Egypt, Syria, Pakistan, Iraq, Azerbaijan, Kazakhstan and Russia – ; downstream operation in 3 – Hungary, Slovakia, Croatia – and retail operations in 10 countries – Hungary, Slovakia, Croatia, Czech Republic, Slovenia, Bosnia, Montenegro, Serbia, Romania and Poland. For more information, please visit the links below:

**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>

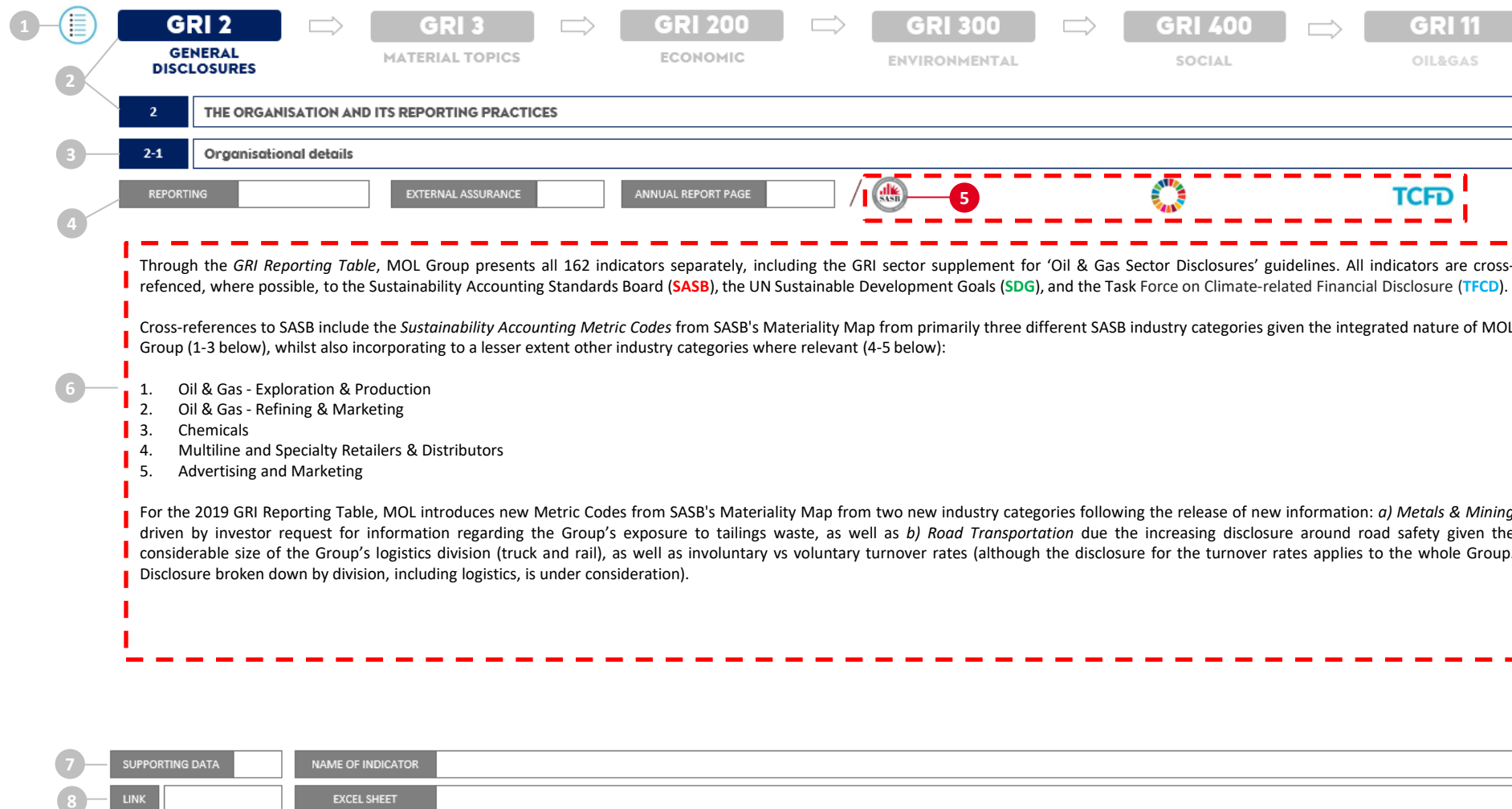
7 SUPPORTING DATA  NAME OF INDICATOR

8 LINK  EXCEL SHEET

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- 3 DISCLOSURE NUMBER / SUB-TITLE
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- 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

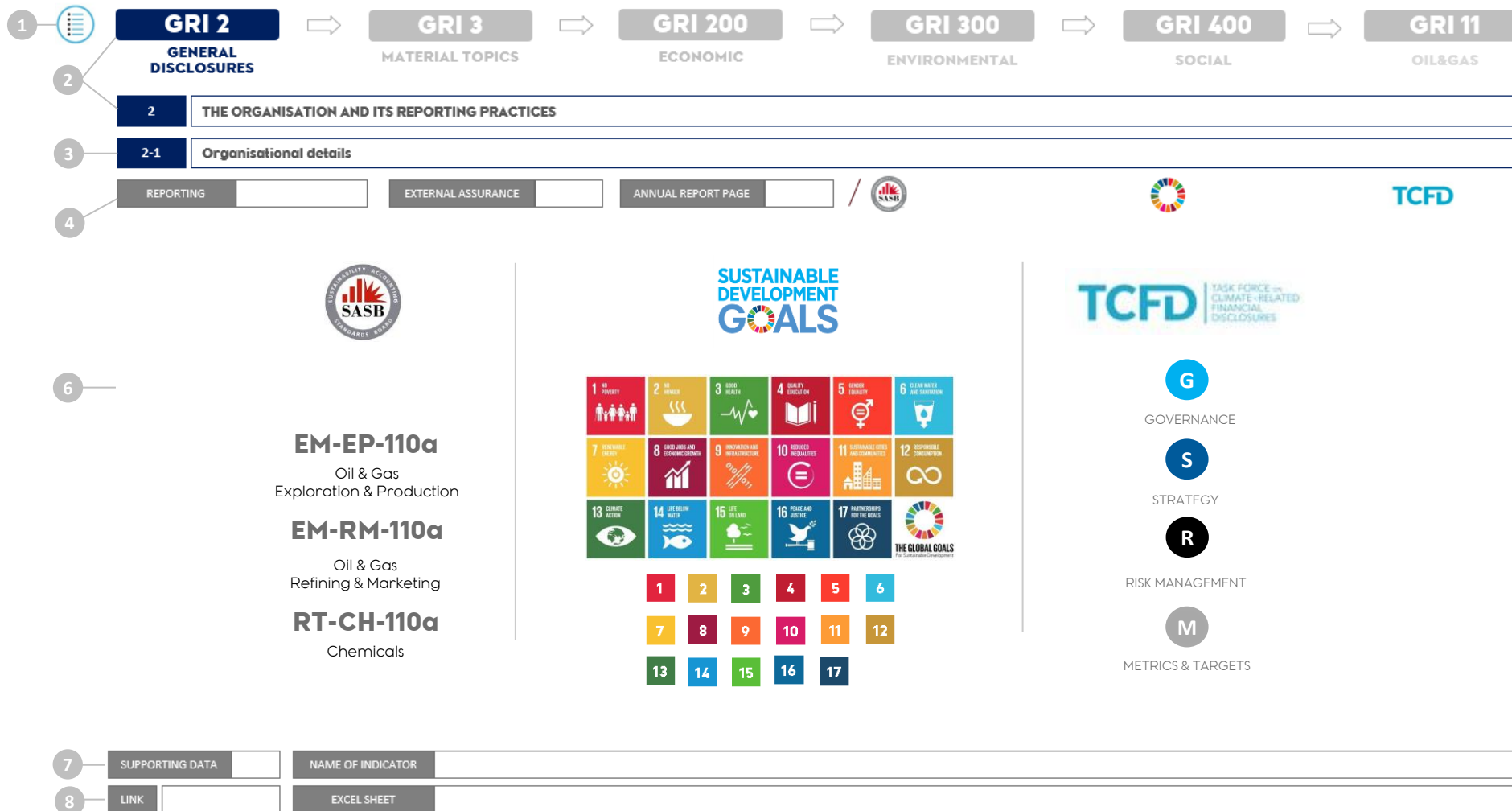
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GRI 205	Anti-corruption	205-3	■	Confirmed incidents of corruption and actions taken	
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GRI 303	Water and Effluents	303-3	■	Water withdrawal	
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GRI 303	Water and Effluents	303-5	■	Water consumption	
GRI 304	Biodiversity	304-1	■	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
GRI 304	Biodiversity	304-2	■	Significant impacts of activities, products, and services on biodiversity	
GRI 304	Biodiversity	304-3	■	Habitats protected or restored	
GRI 304	Biodiversity	304-4	■	IUCN Red List species and national conservation list species with habitats in areas affected by operations	
GRI 305	Emissions	305-1	■	Direct (Scope 1) GHG emissions	
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GRI 305	Emissions	305-7	■	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	
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GRI 306	Effluents and Waste	306-3	■	Significant spills	
GRI 306	Effluents and Waste	306-4	■	Transport of hazardous waste	
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	STANDARD TITLE			DISCLOSURE TITLE	SLIDE
GRI 401	Employment	401-1	■	New employee hires and employee turnover	
GRI 401	Employment	401-2	■	Benefits provided to full-time employees that are not provided to temporary or part-time employees	
GRI 401	Employment	401-3	■	Parental leave	
GRI 402	Labor Management Relations	402-1	■	Minimum notice periods regarding operational changes	
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GRI 403	Occupational Health and Safety	403-4	■	Worker participation, consultation, and communication on occupational health and safety	
GRI 403	Occupational Health and Safety	403-5	■	Worker training on occupational health and safety	
GRI 403	Occupational Health and Safety	403-6	■	Promotion of worker health	
GRI 403	Occupational Health and Safety	403-7	■	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	
GRI 403	Occupational Health and Safety	403-8	■	Workers covered by an occupational health and safety management system	
GRI 403	Occupational Health and Safety	403-9	■	Work-related injuries	
GRI 403	Occupational Health and Safety	403-10	■	Work-related ill health	
GRI 404	Training and Education	404-1	■	Average hours of training per year per employee	
GRI 404	Training and Education	404-2	■	Programs for upgrading employee skills and transition assistance programs	
GRI 404	Training and Education	404-3	■	Percentage of employees receiving regular performance and career development reviews	
GRI 405	Diversity and Equal Opportunity	405-1	■	Diversity of governance bodies and employees	
GRI 405	Diversity and Equal Opportunity	405-2	■	Ratio of basic salary and remuneration of women to men	
GRI 406	Non-discrimination	406-1	■	Incidents of discrimination and corrective actions taken	
GRI 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	
GRI 408	Child Labor	408-1	■	Operations and suppliers at significant risk for incidents of child labor	
GRI 409	Forced or Compulsory Labor	409-1	■	Operations and suppliers at significant risk for incidents of forced or compulsory labor	
GRI 410	Security Practices	410-1	■	Security personnel trained in human rights policies or procedures	
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GRI 11.1	GHG emissions	11.1.3	■	Disclosure 302-2 Energy consumption outside of the organization	
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GRI 11.1	GHG emissions	11.1.5	■	Disclosure 305-1 Direct (Scope 1) GHG emissions	
GRI 11.1	GHG emissions	11.1.6	■	Disclosure 305-2 Energy indirect (Scope 2) GHG emissions	
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GRI 11.3	Air emissions	11.3.1	■	Disclosure 3-3 Management of material topics	
GRI 11.3	Air emissions	11.3.2	■	Disclosure 305-7 Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions	
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GRI 11.4	Biodiversity	11.4.2	■	Disclosure 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
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GRI 11.4	Biodiversity	11.4.4	■	Disclosure 304-3 Habitats protected or restored	
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GRI 11.5	Waste	11.5.5	■	Disclosure 306-4 Waste diverted from disposal	
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GRI 11.12	Forced labor and modern slavery	11.12.1	■	Disclosure 3-3 Management of material topics	
GRI 11.12	Forced labor and modern slavery	11.12.2	■	Disclosure 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	
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GRI 11.19	Anti-competitive behavior	11.19.1	■	Disclosure 3-3 Management of material topics	
GRI 11.19	Anti-competitive behavior	11.19.2	■	Disclosure 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	
GRI 11.20	Anti-corruption	11.20.1	■	Disclosure 3-3 Management of material topics	
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GRI 11.20	Anti-corruption	11.20.5	■	Additional sector disclosures	
GRI 11.20	Anti-corruption	11.20.6	■	Additional sector disclosures	
GRI 11.21	Payments to governments	11.21.1	■	Disclosure 3-3 Management of material topics	
GRI 11.21	Payments to governments	11.21.2	■	Disclosure 201-1 Direct economic value generated and distributed	
GRI 11.21	Payments to governments	11.21.3	■	Disclosure 201-4 Financial assistance received from government	
GRI 11.21	Payments to governments	11.21.4	■	Disclosure 207-1 Approach to tax	
GRI 11.21	Payments to governments	11.21.5	■	Disclosure 207-2 Tax governance, control, and risk management	
GRI 11.21	Payments to governments	11.21.6	■	Disclosure 207-3 Stakeholder engagement and management of concerns related to tax	
GRI 11.21	Payments to governments	11.21.7	■	Disclosure 207-4 Country-by-country reporting	
GRI 11.21	Payments to governments	11.21.8	■	Additional sector disclosures	
GRI 11.22	Public policy	11.22.1	■	Disclosure 3-3 Management of material topics	
GRI 11.22	Public policy	11.22.2	■	Disclosure 415-1 Political contributions	

# UNIVERSAL STANDARDS

GRI 2 - GRI 3



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2 THE ORGANISATION AND ITS REPORTING PRACTICES**

**2-1 Organisational details**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	47, 50-52			
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The name of the organisation is MOL Magyar Olaj- és Gázipari Nyrt. (henceforth MOL Group) headquartered in Dombóvári út 28, 1117 Hungary. More information can be found through the following link: <https://molgroup.info/en/contact-us>

Detailed information about the nature of MOL’s ownership and legal form can be obtained through the following links and from the Annual Report, as well as from capital markets communication materials which are updated on a regular basis: <https://molgroup.info/en/investor-relations/mol-shares>

Annual Report and Data Library – page 47, and 50-52: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Investor Relations Presentation (March 2024) – page 3, : [https://molgroup.info/storage/documents/publications/investor\\_presentations/2024/investor-presentation-202403.pdf](https://molgroup.info/storage/documents/publications/investor_presentations/2024/investor-presentation-202403.pdf)

Visual description of MOL’s location of operations can be found in the links below and in the Investor Relations Presentation. MOL Group has production activities in 10 – Hungary, Croatia, Romania, Egypt, Syria, Pakistan, Iraq, Azerbaijan, Kazakhstan and Russia – ; downstream operation in 3 – Hungary, Slovakia, Croatia – and retail operations in 10 countries – Hungary, Slovakia, Croatia, Czech Republic, Slovenia, Bosnia, Montenegro, Serbia, Romania and Poland. For more information, please visit the links below:

- 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>

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** THE ORGANISATION AND ITS REPORTING PRACTICES

**2-2** Entities included in the organisation's sustainability reporting

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	137-138, 179			
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The list of all entities included in the consolidated financial statements regarding those entities that MOL Group controls or has an interest in; - or equivalent documents can be found in the Annual Report under the Consolidated Financial Statements (Appendix II p. 138-139) section. Detailed information on MOL Group's sustainability reporting scope can be obtained from the Sustainability Report under the "Scope and Boundary section" (p.179), where the relevant subsidiary list is presented.

<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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2 THE ORGANISATION AND ITS REPORTING PRACTICES**

**2-3 Reporting period, frequency and contact point**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	50			
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The reporting period for the information provided by MOL Group can be obtained from the Group’s website and in the latest Integrated Annual Report (links below), which covers the period from 1 st of January 2023 to 31st of December 2023. The Integrated Report – including Financial Statements, MD&A, Corporate Governance Report and Sustainability Report will be published on the day of the Annual General Meeting (April 25, 2024).

For more information, please visit the following links:

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

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

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

Investor Relations: [investorrelations@mol.hu](mailto: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 50)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** THE ORGANISATION AND ITS REPORTING PRACTICES

**2-4** Restatements of information

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	177			
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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 177)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** THE ORGANISATION AND ITS REPORTING PRACTICES

**2-5** External assurance

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	3, 181			
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The BoD approves the assurance service for the Sustainability Report. Information on the description of MOL’s policy and current practice with regards to seeking external assurance for the report and detailed information about the external assurance can be found on our website and in the Annual Report:

- <https://molgroup.info/en/sustainability/reports-and-data>
- <https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 3. and 181.)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2 THE ORGANISATION AND ITS REPORTING PRACTICES**

**2-6 Activities, value chain and other business relationships**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	31, 68			
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 2-1 (information regarding upstream and downstream activities)

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 which can be accessible through the following links.

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

**Information regarding 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 31

**Investor Relations materials providing additional information on business relationships, markets served, and customers can be found on the following link:**

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

**CONTINUES ON THE NEXT SLIDE**

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2 THE ORGANISATION AND ITS REPORTING PRACTICES**

**2-6 Activities, value chain and other business relationships**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/			
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MOL Group is committed to implement the principle of „product stewardship” on the highest level in its procurement processes through the quality and parameters of the purchased products and services. Consequently, the purchased products should satisfy the strictest quality criteria.

MOL Group enters into relationships and conduct business with thousands of suppliers from more than 40 countries 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 emphasis 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.

The concept of Responsible Procurement (RP) is an integral part of MOL Group’s Sustainability strategy. Responsible Procurement Policy has been launched with clear targets on improving sustainability within and via our supply chain.

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **ACTIVITIES AND WORKERS**

**2-7** **Employees**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 113-121 /

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: 24,398 (from annual report page 149.)  
Net sales: 8,900 billion HUF (from annual report page 67.)  
Market capitalization: 6.6 billion USD

The company operates 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 increased in 2023. As of 31 December 2023, the net debt/EBITDA is at 0.6 level (2023: 0.3) while the net gearing is 14% (2022: 11%).

Information on Debt, Equity and Financial risk can be obtained through the Annual Report from page 113-121.

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>

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 – People sheet

- 2-7-a: Total number of employees by employment contract (permanent and temporary) by gender
- 2-7-b: Total number of employees by employment contract (permanent and temporary), by region
- 2-7-b: Total number of employees by employment type (full-time and part-time), by gender
- 2-7-b: Total number of employees by employment type (full-time and part-time), by region

**Comments on remaining indicators:**

- 2-7-c: Data was compiled based on the annual data collection, that was done in January 2023 on a company and segment level. It is based on 2022/12/31 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.
- 2-7-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).
- 2-7-e: No significant variations observed

**PARTIALLY REPORTING EXPLANATION:**

2-7-b/iii - The definition of ,non-guaranteed hours employees’ varies country-by-country, thus group-wide data provision is not possible at this time (data collection in 1-3 years)

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Total workforce
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LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **ACTIVITIES AND WORKERS**

**2-8** **Workers who are not employees**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **N/A**

ANNUAL REPORT PAGE **N/A**



REASON FOR OMISSION:

The definition of ,not-employees' varies country-by-country, thus group-wide data provision is not possible at this time (data collection expected in the in 1-2 years in alignment with the CSRD requirements)

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-9** Governance structure and composition

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 38-47 /   

Details on the governance structure comprising committees of the highest governance body and its composition, and responsibility to manage the accountability on environmental, economic and social topics – are available on MOL Group's website through the following links which also provides the BoD member's names and their CV's, along with corporate governance related documents, including articles of association, charters, corporate governance codes and corporate governance declarations.

**Information regarding the highest governance body and committees can be found in the links below:**

[https://molgroup.info/storage/documents/annual\\_general\\_meeting\\_archive/archive/2023/00\\_agm\\_documents\\_2023\\_en\\_.pdf](https://molgroup.info/storage/documents/annual_general_meeting_archive/archive/2023/00_agm_documents_2023_en_.pdf) pg.76

<https://molgroup.info/en/about-mol-group/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](https://molgroup.info/storage/documents/altalanos_dokumentumok/board_of_directors_documents/2022_02_10_bod_proposal_amendment_of_charter_approved_eng.pdf)

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

**Governance related documents can be accessible via the following links:**

[https://molgroup.info/storage/documents/publications/main\\_governance\\_documents/molnyrt\\_articlesinforce\\_2022\\_12\\_01\\_en.pdf](https://molgroup.info/storage/documents/publications/main_governance_documents/molnyrt_articlesinforce_2022_12_01_en.pdf)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (from page 38 to 47)

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Compositition of the boards / Composition of Supervisory Board and the Board of Directors
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-10** Nomination and selection of the highest governance body

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/			
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Information on the nomination and selection process of the highest governance body and about the criteria used for nominating and selecting the highest governance body members including their views of stakeholders, diversity and independence can be found on our website.

Details regarding the nomination of the highest governance body can be obtained through the following links:

- [https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/mol\\_group\\_policy\\_on\\_director\\_nominations\\_en.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/mol_group_policy_on_director_nominations_en.pdf)
- [https://molgroup.info/storage/documents/publications/main\\_governance\\_documents/molnyrt\\_articlesinforce\\_2022\\_12\\_01\\_en.pdf](https://molgroup.info/storage/documents/publications/main_governance_documents/molnyrt_articlesinforce_2022_12_01_en.pdf)

Main governance documents can be found here:

<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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-11** Chair of the highest governance body

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A			
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Information on the chair of the highest governance body and about his function within MOL's management and the reasons for this arrangement can be found on our website.

**Charter of the Board of Directors including the chair of the highest governance body:**

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/board\\_of\\_directors\\_documents/2022\\_02\\_10\\_bod\\_proposal\\_amendment\\_of\\_charter\\_approved\\_eng.pdf](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 including the chair of the highest governance body:**

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

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

**More information on the Chairman-Chief Executive Officer:**

Articles of association - details on the Chief Executive Office position: [https://molgroup.info/storage/documents/publications/main\\_governance\\_documents/molnyrt\\_articlesinforce\\_2022\\_12\\_01\\_en.pdf](https://molgroup.info/storage/documents/publications/main_governance_documents/molnyrt_articlesinforce_2022_12_01_en.pdf)

Criteria of independence for the members of Board of Directors of MOL -

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/independence\\_criteria\\_for\\_the\\_members\\_of\\_board\\_of\\_directors.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/independence_criteria_for_the_members_of_board_of_directors.pdf)

Policy on nomination of members of the Board of Directors and of the Supervisory Board -

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/mol\\_group\\_policy\\_on\\_director\\_nominations\\_en.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/mol_group_policy_on_director_nominations_en.pdf)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **GOVERNANCE**

**2-12** **Role of the highest governance body in overseeing the management impacts**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/			
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MOL Group's Board of Directors acts as the highest managing body of the Company and as such has collective responsibility for all corporate operations.

To access further details 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 refer to the links below:

[ARTICLES OF ASSOCIATION \(molgroup.info\)](https://molgroup.info)

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

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

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

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/board\\_of\\_directors\\_documents/2022\\_02\\_10\\_bod\\_proposal\\_amendment\\_of\\_charter\\_approved\\_eng.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/board_of_directors_documents/2022_02_10_bod_proposal_amendment_of_charter_approved_eng.pdf)

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

Information regarding goals related to sustainable development can be found here:

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

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 can also be found on our website:

[Annex 1\\_EN Charter of the Board of Directors \(molgroup.info\)](https://molgroup.info)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-13** Delegation of the responsibility managing impacts

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

Details 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/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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-14** Role of the highest governance body in sustainability reporting

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	40			
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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 including MOL Group’s established Sustainable Development Committee which supports the highest governance body’s review and approval process. The roles and responsibilities of the Sustainable Development Committee are available in the Annual Report on page 40:

- <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>
- [https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

The sustainable development governance structure can be obtained via the following links:

- <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



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **GOVERNANCE**

**2-15** **Conflicts of interest**

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	49			
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For 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 links 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](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 49)

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/board\\_of\\_directors\\_documents/2022\\_02\\_10\\_bod\\_proposal\\_amendment\\_of\\_charter\\_approved\\_eng.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/board_of_directors_documents/2022_02_10_bod_proposal_amendment_of_charter_approved_eng.pdf) (VII. 43.)

b. Conflict of interest provisions of the Civil Code (these apply to IG members by default)  
Clauses 15.7, 17.8 and 15.10 of the MOL Articles of Association:

15.7 The members of the Board of Directors shall be subject to the prohibitions on conflicts of interest set out in the Civil Code and the consequences provided for in the event of a breach thereof. If the Chairman of the Board of Directors ceases to be a member of the Board of Directors for any reason, his term of office as Chairman shall also cease.

15.8 The Board of Directors may not manage the business of the Company in a manner that is in breach of these Articles of Association or contrary to any decision of the General Meeting.

15.10. The members of the Board of Directors may be directors of a company which carries on the same economic activity as the Company as its principal activity, if the General Meeting of Shareholders gives its express consent. The members of the Board of Directors may also be senior executives in subsidiaries or interests of the Company which have the same principal activity as the Company without the need for separate approval by the General Meeting.

Chapter VII ("Conflicts of interest, legal compliance")

And a separate policy for related parties based on the relevant EU Directive and the SRD Act: Procedures for the approval and disclosure of related party transactions

These, with the exception of the Civil Code, are all publicly available and are on the website in English and in Hungarian. (What is not on the website and not publicly available is the conflict of interest statement referred to in the IG Code of Conduct.)

PARTIALLY REPORTING EXPLANATION:

2-15-b iii. – is not disclosed, public disclosure is under discussion (expected in the next 1-3 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-16** Communication of critical concerns

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	11			
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Information on MOL’s process for communicating critical concerns to the highest governance body moreover, 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 on 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.

**Relevant information available under section Integrated Corporate Risk Management Function.**

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

**Details regarding the risk review process is available in the Annual Report on page 11.**

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

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

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

PARTIALLY REPORTING EXPLANATION:

MOL Group does not disclose discussed agenda items in 2019, 2020, 2021, 2022 and 2023. Disclosure is under consideration, expected in 1-2 years

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-17** Collective knowledge of the 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.

Information on the collective knowledge of the highest governance body on sustainable development can be found through the following links:

[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

<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



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-18** Evaluation of the performance of the highest governance body

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A		
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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 continuously conducts self-assessment. For further information of the processes and the frequency of the evaluations please visit the following links below.

**Detailed information on the evaluation process of the performance of the highest governance body can be obtained here:**

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

Charter of the Committees operated by the Board of Directors of MOL Plc.  
[https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/committee\\_charter\\_2015\\_final.pdf](https://molgroup.info/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

Corporate Governance Declaration – including self-evaluation (point 4): MOL Plc. Corporate Governance Report in accordance with Budapest Stock Exchange Corporate Governance Recommendations

Articles in Force: [https://molgroup.info/storage/documents/altalanos\\_dokumentumok/main\\_governance\\_documents/molnyrt\\_articlesinforce\\_2021\\_05\\_20.pdf](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>

The Chairman of the Board of Directors provided a detailed evaluation regarding the Board of Directors’ and its committees’ operation which the Board discussed on its meeting held in December 2023.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-19** Remuneration policies

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A		
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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 '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/publications/main\\_governance\\_documents/mol\\_plc\\_remuneration\\_policy\\_2023\\_eng.pdf](https://molgroup.info/storage/documents/publications/main_governance_documents/mol_plc_remuneration_policy_2023_eng.pdf)

**Remuneration report (with exact pay-outs) for BoD and SB members:**

Remuneration report about 2023 to be published for the Annual General Meeting.

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

**PARTIALLY 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. Further disclosure on this indicator is under discussion (data collection in 2-3 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



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ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** GOVERNANCE

**2-20** Process to determine remuneration

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A		
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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/storage/documents/altalanos_dokumentumok/main_governance_documents/committee_charter_2015_final.pdf)

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

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.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



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ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
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**2** GOVERNANCE

**2-21** Annual total compensation ration

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A			
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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 Plc employee wages and salaries data are published in our consolidated Annual report (p.19)

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

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

[Annual financial reports - INA, d.d.](#)

INA staff costs and employee benefits data are published in the Annual report (p. 65, 104):

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

PARTIALLY 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.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Wages and salaries
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LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-22** Statement on sustainable development strategy

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	4			
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A statement from the Chairman-CEO and Group CEO is published each year in the MOL Group Integrated Annual Report, available in the latest Annual 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-23** Policy commitments

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A			
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MOL Group Code of Ethics and Business Conduct and Business Partner Code of Ethics guarantees that MOL Group has a responsible business conduct. Ethical behaviour has a long tradition and history at MOL Group. The first Code of Ethics was introduced in 1992 and since then it has been kept up to date in conjunction with MOL Group’s development. MOL Group’s responsibility is not limited by corporate boundaries. MOL Group is fully aware of the responsibility it has for all internal and external stakeholders, so it makes a conscious effort to convey it’s core values to other parties.

Detailed operations of the Ethics Council are set out in the following regulations:

1. Ethics management system in MOL Group

This regulation details the tasks and scope of the Ethics Council, Preparatory Committee, Group and Local Ethics Officers.

2. Regulation of ethics reports management in MOL Group

This regulation is about how to file an ethics complaint, who and how the complaint will be managed, investigated and also sets rules for consequence management.

MOL Group respects the fundamental human rights as our Group Code of Ethics and Business Conduct stipulates. MOL Group respects the Universal Declaration of Human Rights which summarizes fundamental human rights in 30 articles (United Nations General Assembly 1948) and further guidance documents on human rights such as the UN Global Compact (2000), the UN Guiding Principles (‘Ruggie Framework’) (2011), the OECD Guidelines for Multinational Enterprises (2011) and voluntary principles about security and human rights. We are striving to implement them into our every day business operations.

All Board members, executive officers and employees of MOL Group member companies (MOL Plc. and all business enterprises controlled by MOL Plc.) must act in compliance with the policy commitments, which is approved on the highest management level. All business partners must receive the Business Partner Code of Ethics. At all companies owned but not controlled by MOL Plc. MOL Group makes conscious and continuous efforts to implement the Code and to ensure that ethical norms are adopted. All newcomers receive the Code of Ethics and Business Conduct prior to their first workday and get an onboarding Ethics training (e-learning or personal training), where they must pass a test. Annually all employees must pass the Code of Ethics test via e-learning or classroom training.

Ethics Risks are continuously monitored, evaluated and improvements are implemented in internal regulations and procedures, in order to strengthen and preserve the ethical foundations of MOL Group’s business operations and to protect the ethical values MOL Group established. Ethics risk assessment is integrated in M&A, trading and procurement KYC procedures, due diligence processes ensure that not only individuals and MOL Group companies, but also MOL Group partners comply with all relevant legislation, ethical business conduct, human rights and anti-corruption rules.

Links to the policy commitments: <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/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

Business Partner Code of Ethics available here: [https://molgroup.info/storage/documents/sustainability/uzleti\\_partneri\\_etikai\\_kodex/business\\_partner\\_code\\_of\\_ethics\\_english\\_2022.pdf](https://molgroup.info/storage/documents/sustainability/uzleti_partneri_etikai_kodex/business_partner_code_of_ethics_english_2022.pdf)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-24** Embedding policy commitments

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A			
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MOL Group’s Ethics and Governance focus area – as part of the general sustainability framework – covers those topics which are related to the responsible management of the company. It includes MOL Group’s ethics management framework and also the governance structure and practices that contribute to the sustainability of the company. Ethics and governance practices are essential to ensure that the company understands and mitigates the sustainability risks of its operation and is able to manage those risks. It contributes to improving MOL Group’s financial position while maintaining its authenticity and validity to investors and operating as “good corporate citizen”. In this area MOL Group considers topics such as corporate governance, business ethics, transparency, risk management.

In order to ensure the lawful and ethical operation of MOL Group, the SpeakUp! whistleblower system (<https://molgroup.info/en/speak-up>) has been established in 2006 to report violations of the Code, which are assessed by the Ethics Council. The procedure policy is governed by two separate policies: Ethics Management System in MOL Group ([https://molgroup.info/storage/documents/sustainability/etikai\\_management\\_rendszer\\_en.pdf](https://molgroup.info/storage/documents/sustainability/etikai_management_rendszer_en.pdf)) and the Regulation of Ethics Reports Management in MOL Group ([https://molgroup.info/storage/documents/sustainability/etikai\\_bejelentesek\\_kezelese\\_en.pdf](https://molgroup.info/storage/documents/sustainability/etikai_bejelentesek_kezelese_en.pdf)).

Essential mission of the Ethics Council (EC) is to ensure MOL Group's ethical conduct and coordinate structured ethics development at all MOL Group companies by making individual decisions on ethics complaints, coordinating ethics trainings and activities. Its operation is regulated in the EC Rules of Procedure. Permanent members of the EC are executive managers and employee representative. The Chairperson of the Ethics Council is a person with independent approach monitoring and safeguarding impartial and fair procedures. Operational work of the Ethics Council (e.g. operating grievance mechanisms, investigation, consequence management) is assisted by a Group Ethics Officer. Local Ethics Officers have been nominated from among employees by chief executive officers in every MOL Group company which have more than 20 employees. Ethics monitoring: Country Chairpersons and CEOs must provide ethics related information annually (figures on e.g CoEBC trainings completed, other actions).

All business partners must receive the Business Partner Code of Ethics as a binding appendix of contracts. At all companies owned but not controlled by MOL Plc. MOL Group makes conscious and continuous efforts to implement the Code and to ensure our ethical norms are adopted.

Every newcomer receives an onboarding Ethics training (e-learning or personal training) and acknowledges the Code of Ethics and Business Conduct. Annually all employees must pass a Code of Ethics test via e-learning or classroom training. Service station partners’ employees must have special ethics training every year.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-25** Process to remediate negative impacts

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	11	/	EM-EP-540a.2 / EM-RM-540a.3		<b>R</b>
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Information on MOL Group's commitments to cooperate in the remediation of negative impacts can be found in the Annual Report on p.11. "under the "Risk Management Report".

The approach to identify and address grievances, including grievance mechanisms can be found in the Annual Report under 'Community Engagement Section' and GRI 11.15.4 indicator.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-26** Mechanisms for seeking advice and raising concerns

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-510a.2		<b>16</b>	
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MOL Group operates a corporate grievance mechanism called “SPEAK-UP! “ under the coordination of the Group Ethics Officer. Internal and external stakeholders have the possibility to report an ethical misconduct or seek advice in a written form or verbally as well (post, e-mail, internet system and through the 7/24 phone message recording system). The detailed rules of how to raise a question or file an official ethics report, who and how the ethics report will be handled can be found in the Ethics Council’s Rules of Procedure policies (links below). Anonymous reporting is also possible, confidentiality is ensured and data protection rules are followed.

Any employee, or anyone who is in a contractual relationship with a company belonging to MOL Group or who has a reasonable legitimate interest in filing a report or remedying the conduct complained of, may initiate an ethics procedure, file a report if they detect a conduct in violation of the Code. The violation may be in relation with a member organisation of MOL Group, a service station, supplier, distributor, contractual, sponsored or supported partner or a joint venture.

The full list of ethics reports in 2023 can be obtained from 2019-2023 Data Library.

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

MOL GROUP ETHICS COUNCIL RULES OF PROCEDURE POLICIES

Ethics management system in MOL Group  
[https://molgroup.info/storage/documents/sustainability/etikai\\_management\\_rendszer\\_en.pdf](https://molgroup.info/storage/documents/sustainability/etikai_management_rendszer_en.pdf)

Regulation of ethics reports management in MOL Group  
[https://molgroup.info/storage/documents/sustainability/etikai\\_bejelentesekek\\_kezelese\\_en.pdf](https://molgroup.info/storage/documents/sustainability/etikai_bejelentesekek_kezelese_en.pdf)

SUPPORTING DATA	YES	NAME OF INDICATOR	Ethics reports – Total / Topics of Ethics Complaints (whistle-blower reports) - Total
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-27** Compliance with laws and regulations

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A		
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MOL Group is dedicated to practicing fair market behavior; its activities on the market must be conducted in accordance with the norms of fair competition and the spirit and letter of applicable competition law. Fully complying with competition law is not only a legal obligation but is related to attitudes and cultures that can positively impact a company’s business. The aim of MOL Group’s Compliance plan is to raise awareness of our employees and to eliminate legal risks, thus supporting the effective implementation of business strategies in a legal way.

Group Compliance organization has a constantly adjusted scope to the changing regulatory and business environment (Group Compliance Plan), which focuses on those compliance risks that require engagement on corporate level, e.g. competition law, consumer protection, personal data protection rules and international trade restrictions and to prevent insider trading and anti-money laundering. These areas may bring high potential consequences (fines, reputational risks, behavioral remedies etc.). Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing trainings to increase awareness. Group Compliance has its dedicated experts. In-house investigations aiming at monitoring compliance with internal and external commitments are being performed.

Any anti-competitive proceedings are notified to Group Legal and Compliance unit. During 2023 MOL Group was not subject to any fines related to anticompetitive 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 2023. There is an ongoing investigation of the Montenegrin Agency for the Protection of Competition for an alleged violation of competition law (concerted practice) against INA – Crna Gora d.o.o. with no outcome to this date. More information can be obtained from the Integrated Annual Report „Integrity & Transparency” section:

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>

Total cost of violations of environmental legal obligations/regulations can be found in the FY2023 Data Library through the following link:

[Data Library](#)

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	<b>YES</b>	NAME OF INDICATOR	HSE related penalties
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** STRATEGY, POLICIES AND PRACTICES

**2-28** Membership associations

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-530a.1 / EM-RM-530a.1		
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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/storage/documents/sustainability/commitments_to_external_initiatives.pdf)  
<https://molgroup.info/en/sustainability/our-commitments>

During 2023, MOL Group’s total spending on membership fees for EU, international and national associations amounted to EUR 1.426 thousand.

The breakdown of the total FY 2022 Group’s membership fees consisted of the following amounts:

- EU Policy:** Combined yearly fee of EUR 821 thousand covering main EU Policy associations, incl. EPRA (FuelsEurope and Concawe), CEFIC and IOGP, covering a range of issues part of the European Green Deal, including sustainable finance, renewable energy, energy efficiency, emissions trading, circular economy, industrial emissions, occupational and chemical safety and well as security of supply.
- EU and International Associations:** Combined yearly fee of EUR 161 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 (Hungary, Slovakia, Croatia, Czechia, Poland, Austria, Slovenia, Romania, Bosnia, Serbia):** Combined yearly fee of EUR 470 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
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **STAKEHOLDER ENGAGEMENT**

**2-29** **Approach to stakeholder engagement**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	RT-CH-210a.1		
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The list of stakeholder groups (divided by categories) engaged by MOL Group can be obtained through the following link:

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

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!”

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**2** **STAKEHOLDER ENGAGEMENT**

**2-30** **Collective bargaining agreements**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	160	/	EM-EP-530a.1 / EM-RM-530a.1		
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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\\_code\\_of\\_ethics\\_23.pdf](https://molgroup.info/storage/documents/sustainability/mol_code_of_ethics_23.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, 93% of the employees are covered by collective agreements, included in the Annual Report 2022 (pp. 160)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 160.)

SUPPORTING DATA	YES	NAME OF INDICATOR	Fair employment – Freedom of association
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**3 DISCLOSURES ON MATERIAL TOPICS**

**3-1 Process to determine material topics**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A			
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To identify material topics, MOL Group undertakes materiality assessment following GRI recommendations. The aim of the exercise is to identify relevant sustainability-related issues which are the most material for MOL Group and its external stakeholders in line with MOL Group's strategic objectives – in alignment with the 2030+ strategy. The practice has been introduced in 2020 with applying incremental methodological changes each year. The latest assessment was performed in November 2023.

The description of the process, methodology, involved stakeholders and results are published in MOL Group's Integrated Annual Report 2023 (Section 'MOL Group materiality assessment and matrix – page XXXX), accessible via the following link: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Process of the assessment:

1. The first step of the materiality assessment was a scoping of the relevant stakeholders. In case of the internal stakeholders, we selected a matrix sample to represent both MOL Group's corporate structure (Downstream, Upstream, Consumer Services and Corporate Functions) and geographic structure (Group-level divisions, Mol Hungary, Slovnaft and INA). To assess the Group's impact on external stakeholders, we shortlisted stakeholders including investors & financial analysts, creditors and banks, affected communities, regulators and non-governmental organisations.
2. We reached out to the selected stakeholders by sending them tailored questionnaires to assess their views over the 21 sustainability topics. Furthermore, we conducted in-depth interviews to gather insightful details shared by high-priority stakeholders. Overall, we have registered more than 75 samples to our assessment.
3. We concluded the exercise by preparing the Materiality Matrix. We used a group-based weighting to sufficiently represent all stakeholders. The weighted rating of internal stakeholders on each 21 topics is shown on the horizontal axis ('Importance to MOL Group'), while the y-axis represents the external views similarly ('Impact on External Stakeholders').

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**3 DISCLOSURES ON MATERIAL TOPICS**

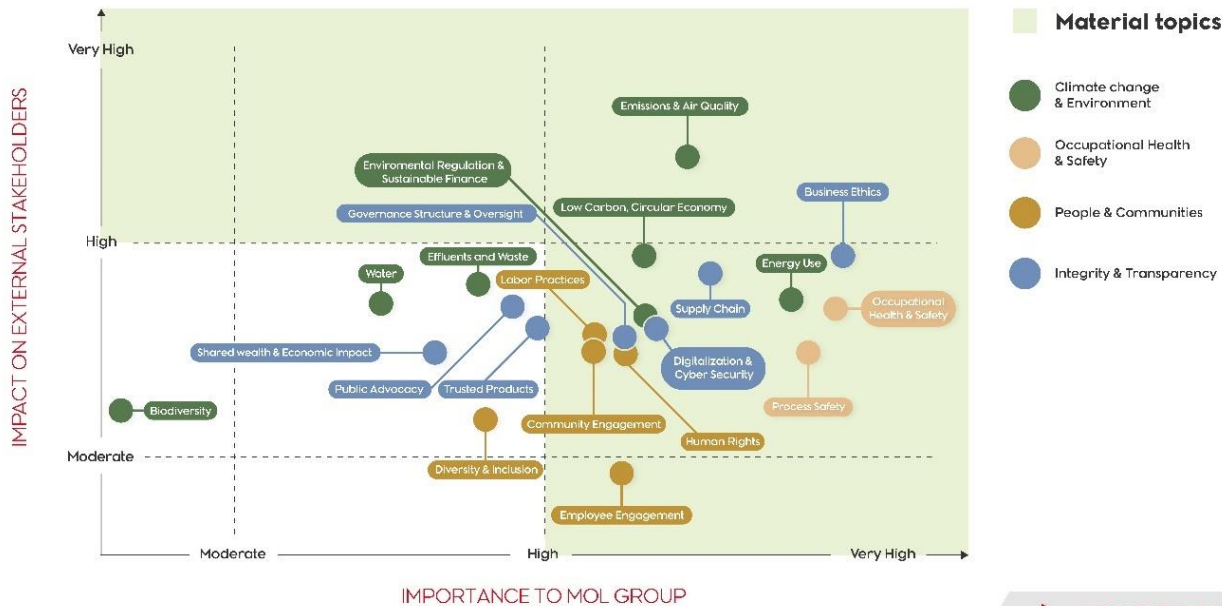
**3-2 List of material topics**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **5**



**TCFD**

In 2023 MOL Group undertook an in-depth materiality assessment to identify relevant sustainability-related issues which are the most material for the Group and its external stakeholders. The practice has been introduced in 2020 with applying incremental methodological changes each year. The assessment was undertaken to have a deeper understanding of external stakeholders meanwhile increased the involvement of internal stakeholders. In 2023, MOL Group broadened the list of consulted stakeholders to enhance the validity of the assessment and increase our preparedness for the double materiality assessment introduced in 2024. The list of material topics based on the 2023 materiality assessment can be accessed in MOL Group’s Integrated Annual Report 2024 (Section ‘MOL Group materiality assessment and matrix – page 5), accessible on the following link: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>. Material topics are visually represented in the Materiality Matrix:



Group level issues considered as material are related to the following areas: climate change and environment, health and safety, integrity and transparency, as well as people & communities. Compared to last year’s assessment, general increase can be observed in nearly all topics, especially on previously emerging matters (human rights, biodiversity, community engagement) and governance topics (business ethics, transparency of corporate governance). The most important topics remained emissions (particularly CO2), energy use, occupational health & safety and business ethics.

Two new topics – human rights and community engagement - moved to the material field. In this case, we performed a revision of our current reporting practice to elaborate more on the disclosures.

4 topics – water, diversity & inclusion, shared wealth & economic impact, public advocacy were shifted downwards to the emerging category (attributed to the more broad stakeholders base where the inputs were collected and shifting industry standards). Regardless of these trends we maintained the detailedness of our disclosures for the shifted topics as well.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**3 DISCLOSURES ON MATERIAL TOPICS**

**3-2 List of material topics**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 5



For each material topic the explanation of how MOL Group 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:

1. Corporate Governance: <https://molgroup.info/en/about-mol-group/corporate-governance>
2. Ethics: <https://molgroup.info/en/sustainability/ethics-and-governance>
3. Supplier management: <https://molgroup.info/en/about-mol-group/supplier-center>
4. Employees: <https://molgroupcareers.info/en/working-at-mol-group/our-employees/rewarding-employees>
5. Climate Change: <https://molgroup.info/en/sustainability/climate-change>
6. Environment: <https://molgroup.info/en/sustainability/environment>
7. Health & Safety: <https://molgroup.info/en/sustainability/health-and-safety>
8. Human Capital: <https://molgroup.info/en/sustainability/human-capital>
9. Community Engagement: <https://molgroup.info/en/sustainability/communities>

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**3 DISCLOSURES ON MATERIAL TOPICS**

**3-3 Management of material topics**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   **TCFD**

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

Concrete document related to the relevant (3-3) indicators that describes how they are managed is not available instead, the topical sections of the Integrated Report provides an overall picture of the management of material topics. MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section. Further information regarding the potential negative and positive impacts of each material topic can be obtained of MOL Group's Integrated Annual Report 2023, accessible via the following link: <https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

Material issues are predominantly addressed inside the Sustainability Report (SR). However, other parts of the Integrated Annual Report are also covering material issues, including Management Discussion & Analysis (MDA), Corporate Governance Report (CGR) and Financial Statements & Accounts (FSA). Supportive background information is covered in the GRI Reporting Table (GRI) with the Data Library (DL) containing 600+ ESG (Environmental, Social, and Governance) indicators broken down, where applicable, by country, site, age group, gender etc. Description of emerging issues (below) are also covered throughout the Integrated Annual Report, in addition to the Data Library and the GRI Reporting Table (where applicable).

MATERIAL TOPICS	ESG DISCLOSURES	
	GRI U/T	GRI 3-3 O&G
Emissions & Air Quality	305	11.1.1,11.2.1,11.3.1
Low carbon, Circular Economy	301	11.2.1
Energy Use	302	11.1.1
Environmental Regulation & Sustainable Finance	415	
Governance Structure & Oversight	2-9 – 2-30	
Business Ethics	205, 206-1	11.19.1, 11.20.1,11.21.1
Digitalisation & Cyber Security	418	
Supply Chain	2-6,308, 414	11.18.1
Human Rights <i>(New in 2023)</i>	410, 411	11.12.1,11.17.1
Process Safety	403-5	11.8, 11.9.1
Health & Safety	403	
Employee Engagement	2-7,401-1, 404	11.10.1
Labor Practices	401-2, 401-3, 402-1, 407, 408, 409	11.10.1,11.13.1
Community Engagement <i>(New in 2023)</i>	413	11.15.1,11.16.1

EMERGING TOPICS	ESG DISCLOSURES	
	GRI U/T	GRI 3-3 O&G
Shared Wealth & Economic Impact	201,202,203	11.14.1
Trusted Products	416, 417	
Public Advocacy	415	11.22.1
Biodiversity	304	
Water	303	11.6.1, 11.7.1
Effluents and Waste	306	11.5.1
Diversity & Inclusion	405, 406	11.11.1

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

LINK **N/A** EXCEL SHEET **N/A**

# TOPIC STANDARDS

GRI 201 - GRI 418



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**201** **ECONOMIC PERFORMANCE**

**201-1** **Direct economic value generated and distributed**

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

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/investors/financial-reports/annual-financial-reports/>

INVESTOR PRESENTATIONS

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

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Economic
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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 **N/A** /  EM-EP-420a.4  **13**  **S** **R**

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 “Soil and Groundwater Protection” sections of the 2023 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 37, and EBITDA figures on page 38. 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/2024/strategy-review-2024.pdf](https://molgroup.info/storage/documents/publications/investor_presentations/2024/strategy-review-2024.pdf)

- To summarize the related annual report pages:
- a description of the risk or opportunity and its classification as either physical, regulatory, or other.
  - a description of the impact associated with the risk or opportunity.
  - the financial implications of the risk or opportunity before action is taken.
  - the methods used to manage the risk or opportunity.
  - the costs of actions taken to manage the risk or opportunity.

PARTIALLY 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**201** **ECONOMIC PERFORMANCE**

**201-3** **Defined benefit plan obligations and other retirement plans**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **103** /  EM-EP-420a.4  **8** 

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 103.)

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

**PARTIALLY 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 for fully disclosing the indicator (disclosure expected in the next 1-3 years).

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**201** **ECONOMIC PERFORMANCE**

**201-4** **Financial assistance received from government**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   

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>

**PARTIALLY 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	<b>YES</b>	NAME OF INDICATOR	Financial assistance received from government
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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 / SASB 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 employees) 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>

PARTIALLY REPORTING 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 PEOPLE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**202** MARKET PRESENCE

**202-2** Proportion of senior management hired from the local community

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE 163 / SASB 8 10 TCFD

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 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 163)

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

[Corporate governance - INA, d.d.](#)

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

PARTIALLY REPORTING EXPLANATION:  
Data for 202-2 b.c.d. is not available at the moment. Further disclosure on this indicator is under discussion.

SUPPORTING DATA	YES	NAME OF INDICATOR	Ratio of senior executives (CEO, or HAY21 and above) with local citizenship to all senior executives (CEO, or HAY21 and above)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE



**203** **INDIRECT ECONOMIC IMPACTS**

**203-1** **Infrastructure investments and services supported**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 157 /

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.

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 People & Communities section:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (Annual report page 157.)

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

Further highlighted infrastructure investments:

**Upstream:**

- The continued pipeline integrity program in the Central Eastern European (CEE) region (in Hungary and Croatia) and in Russia contributed to safer operations, a program that indirectly protects the communities MOL Upstream operates in as this replacement activity aims to prevent any leakages to the environment before they happen. Not only did the total amount of spills decrease, but the involvement of employees in reporting these accidents also grew. The Russian operation proves the program’s importance, as pipeline leaks have been reduced by more than 60% compared to the previous years. The program also reduced the volume of spill with more than 90%.
- MOL Pakistan, as part of its Corporate Social Responsibility (CSR) endeavors, recently exhibited its commitment to the communities in which it operates by donating two (02) fully equipped Toyota Hi-Ace ambulance cars to the representatives of Kohat Division administration; one each for the Kohat and Hangu Districts. The donation of these ambulances, at a total cost of ~ EUR 95,000, aims to bolster the local administration’s capacity to provide swift and efficient healthcare accessibility across the districts of Kohat and Hangu. By ensuring prompt transportation for patients to the nearest medical facilities, the initiative seeks to enable the health department to respond effectively to healthcare-related emergencies
- MOL Campus – detailed information on MOL Group’s new HQ and related infrastructure developments can be found in the Annual Report (px) and our website. As part of the MOL Campus-related infrastructural developments, the establishment of MOL’s kindergarten (‘Égigérő óvoda’) should be highlighted, so MOL employee parents can keep their children safe and close to their workplace, in a modern kindergarten with a green environment, in the hands of qualified teachers.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Social investments - donations, in-kind and leverage
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	COMMUNITIES



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**203** **INDIRECT ECONOMIC IMPACTS**

**203-2** **Significant indirect economic impacts**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **162**



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 162)

PARTIALLY REPORTING 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**204** **PROCUREMENT PRACTICES**

**204-1** **Proportion of spending on local suppliers**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   **11 12** 

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. One of the main objective of Procurement organization on sustainability is to purchase product and services with lower environmental impact and with higher positive results.

MOL Group have been set up the framework of the Supplier Lifecycle Management, which consists of four pillars: i) Supplier Qualification ii) Supplier Evaluation & Selection iii) Supplier Performance Evaluation iv) Supplier Relationship Management. MOL Group is aiming to develop further cooperation with suppliers and facilitating MOL Group efforts related to sustainable development, including the preparation of a standard criteria system for activities with risk exposure. Sustainability strategies, targets and actions are being incorporated in the category management and supplier relationship management framework. 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 50001:2018 requirements (energy management system), these are also applied when dealing with procurement of production materials/assets. Total cost of ownership (TCO, cost during the life-cycle) is part of the evaluation framework, where energy effective solutions are promoted. The origin of the given asset/material is also taken into account during the supplier selection procedure. MOL Group is only concluding contracts with suppliers that have been pre-screened from financial, legal and sustainability, and pre-qualified from HSE aspect. MOL Group is committed to be business partner of suppliers with ethical attitude, thus potential suppliers are also subject of ethical pre-screening (i.e. Illicit employment practices, money laundering activities, terrorist financing, bribery, corruption etc. are reasons for 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 2023, the total value of Non-HC spend between MOL Group and locally registered businesses is EUR 4152 mn (75%).

**Proportion of spending on local suppliers** data 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**



205	<b>ANTI-CORRUPTION</b>
205-1	<b>Operations assessed for risks related to corruption</b>

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-510a.2		
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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 2023, sixteen different processes were selected to undergo fraud risk assessments. No corruption related findings were detected, the findings mainly show the need of process adjustments.

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

PARTIALLY 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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 knew 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 ). 96% of MOL Group employees passed an annual ethics training in 2023, which includes the topic of anti-corruption. Training about anti-corruption policies and procedures was not organised to governance body members in 2022. In 2023 Group Security Anti-Fraud Team issued monthly Anti-Fraud newsletter, as a mass awareness tool which were distributed to all L1-4 managers and employees in Q4 via Group portal of MOL Group. Supportive narrative can be obtained from the annual report.

[https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](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 (defines 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. 100% of all supplier contracts contain the BPCE or other reference to ethics values. 100 % of all sponsorship contracts contain the BPCE or other reference to ethics values. 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](https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf)

In 2023, 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 as well.

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 is not available at the moment, disclosure is under discussion (data collection in 1-2 years).

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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**



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 internal investigation and ethics reports. During 2023, 2 incidents of either bribery, corruption, gifts or hospitality were reported through the whistle-blower reporting system of MOL Group (including INA Group as well), in connection with these issues no employees were dismissed or disciplined for corruption, and contracts with business partners were not terminated. During 2023, 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.

Based on State Attorney Office’s organized crime investigation initiated against INA managers, also an internal investigation was conducted in order to identify the potential fraudulent activities of INA Gas & Power department. It was established that the internal regulations were violated and by entering into contracts with different companies, significant financial and opportunity loss has been incurred to INA. Official State Attorney’s Office investigation is still ongoing. In connection with this, INA strengthened its internal preventive and control measures, and has applied consequence management measures towards its employees and companies involved. Also, INA engaged an independent expert to review all relevant business processes and provide suggestions for strengthening them.

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 **INTEGRITY&TRANSPARENCY**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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 is dedicated to practicing fair market behaviour; its activities on the market must be conducted in accordance with the norms of fair competition and the spirit and letter of applicable competition law. Fully complying with competition law is not only a legal obligation but is related to attitudes and cultures that can positively impact a company’s business. The aim of MOL Group’s Compliance plan is to raise awareness of our employees and to eliminate legal risks, thus supporting the effective implementation of business strategies in a legal way.

MOL Group fully respects and complies with the respective competition law of the Treaty of the European Union and all national legislation which is defined in the Competition Acts of all those countries where MOL Group companies are active. MOL Group has a policy aimed at ensuring compliance with, and preventing infringement of, competition law.

Group Compliance organization has a constantly adjusted scope to the changing regulatory and business environment (Group Compliance Plan), which focuses on those compliance risks that require engagement on corporate level, e.g. competition law, consumer protection, personal data protection rules and international trade restrictions and to prevent insider trading and anti-money laundering. These areas may bring high potential consequences (fines, reputational risks, behavioural remedies etc.). Group Compliance Plan is operated for minimizing compliance exposure by conducting investigations and performing trainings to increase awareness. Group Compliance has its dedicated experts. In-house investigations aiming at monitoring compliance with internal and external commitments are being performed.

During 2023 MOL Group was not subject to any fines related to anticompetitive 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 2023. In 2023 the German Federal Antimonopoly Office initiated its ad-hoc sectoral assessment in which it requested information from MOL Germany covering the wholesale trading in petroleum products in Germany, there is no specific outcome to date. There is an ongoing investigation of the Montenegrin Agency for the Protection of Competition for an alleged violation of competition law (concerted practice) against INA – Crna Gora d.o.o. with no outcome to this date.

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 **INTEGRITY&TRANSPARENCY**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**207** TAX

**207-1** Approach to tax

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



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 strategy 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 available internally.

**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 segment of its activity including tax.

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

LINK **N/A** EXCEL SHEET **N/A**



207	<b>TAX</b>
207-2	<b>Tax governance, control and risk management</b>

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/ 	 16	
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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 MOL Group Ethics and Governance rules (second link below) as questions are answered, complaints are investigated and the Ethics Council assesses the raised issues. The reporting concerns about unethical or unlawful behaviour 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 AND GOVERNANCE: <https://molgroup.info/en/sustainability/ethics-and-governance>

**PARTIALLY REPORTING EXPLANATION:**

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**207** **TAX**

**207-3** **Stakeholder engagement and management concerns related to tax**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   **16** 

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

PARTIALLY 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**207** **TAX**

**207-4** **Country-by-country reporting**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

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. Further disclosure on this indicator is under discussion.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**301** **MATERIALS**

**301-1** **Materials used by weight or volume**

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

MOL Group’s primary sold products consist of extracted oil, gas and condensate gas from upstream operations. As a result, regarding the upstream operation, MOL Group does not track materials used by neither weight nor volume. On the other hand, MOL Group’s downstream division turns crude oil into refined products, such as gasoline, diesel, and aviation fuel, which are the primarily sold products of this business activity.

Regarding MOL Group’s downstream operation, the following raw materials are used as input materials for its’ primary products:

- Non-renewable materials:
  - Crude oil
- Renewable materials
  - Water (Environment sheet/water withdrawal, Refinery).

The Downstream Production’s total crude oil and water consumption can be found in the Data Library via the following link:

<https://molgroup.info/hu/befektetoi-kapcsolatok/jelentesek#nav-eves-jelentesek>

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Water Consumption; Downstream Production; MOL Group crude oil processing
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT / DOWNSTREAM





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**301** **MATERIALS**

**301-2** **Recycled input materials used**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



**PARTIALLY REPORTED - REASON:**

MOL Group's primary sold products consist of extracted oil, gas and condensate gas from upstream operations, as well as fuel from retail operations. However, Mol Group is also engaged in various other activities where using recycled materials is significant. We currently do not have a comprehensive methodology that provides a single figure for the % of recycled materials covering all relevant operations.

**Fuels:**

Downstream division's primarily sold products are gasoline, diesel, and aviation fuel. In 2023, MOL Group purchased >600 kilotons of biofuels for blending to produce sustainable diesel.

**Bitumen:**

- 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 2023, the longest rubber bitumen highway section was constructed, by using 10.000 tonnes of rubber bitumen produced by MOL Group. Further information can be accessed through the following link

<https://mol.hu/hu/molrol/mediaszoba/7934-elkeszult-magyarorszag-leghosszabb-gumibitumenes-utszakasa>

**Lubricants:**

- In 2012, MOL-LUB introduced recycled PET packaging for its autochemical products (coolants, screen washer fluids ). Cardboard boxes are made partly from recycled paper. <https://molgroup.info/en/sustainability/environment>

**Plastic products:**

- In 2019, Aurora Kunststoffe GmbH, a recycled plastic-based compounder in Germany, was acquired by MOL Group. Aurora collects industrial plastic waste, recycles it and then upgrades the properties of the material into an enhanced plastic that suits the requirements of the customers in the car manufacturing industry. More information can be obtained from the link below:

<https://molgroup.info/en/media-centre/press-releases/mol-group-completes-acquisition-of-aurora-group-strengthening-position-in-recycled-sustainable-plastics-compounding-segment>,

- Continuously aligned with the Shape Tomorrow 2030 updated Strategy, in 2022 MOL Group acquired ReMat Zrt., a Hungarian market-leading plastics recycling company which uses communal and industrial waste for creating regranules. The company's annual processing capacity is 25,000 tons. More information can be obtained via the following link:

<https://molgroup.info/en/media-centre/press-releases/mol-group-acquired-remat-hungarys-market-leading-plastics-recycling-company>

- MOL's total capacity of recycled plastic material raised to 40,000 tons/year, together with the latest acquisition of Aurora Kunststoffe GmbH in Germany

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**301** MATERIALS

**301-3** Reclaimed products and their packaging materials

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  CG-MR-410a.3  

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-visszagujtes-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>

PARTIALLY REPORTING EXPLANATION:

Currently MOL Group does not disclose the percentage of reclaimed products and their packaging material for each product category (data collection in 1-2 years).

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Recollected lubricant and lubricant packaging
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**302 ENERGY**

**302-1 Energy consumption within the organization**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 149 /  RT-CH-130a.1  

302-1 c, 302-1 d, 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:

302-1 g

As part of the HSE Performance Target Setting and Reporting Internal Policy, conversion factor for energy consumption is defined. MOL Group uses a combination of sources for conversion factors due to the complexity of our energy supply sources (IPCC, EIA, StatCan, ICBE etc.) and can be accessed through the following links:

[https://www.ipcc-nggip.iges.or.jp/public/gp/bgp/2\\_1\\_CO2\\_Stationary\\_Combustion.pdf](https://www.ipcc-nggip.iges.or.jp/public/gp/bgp/2_1_CO2_Stationary_Combustion.pdf)

[Energy statistics handbook: Conversion factors \(statcan.gc.ca\)](#)

[Energy conversion calculators - U.S. Energy Information Administration \(EIA\)](#)

[Convert - Quantity of Fuel Type to Volume of CO2 \(icbe.com\)](#)

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 149.)

MOL Group does not use coal/lignite as a source of fuel/energy for any of its Downstream sites (Downstream makes up 86% of the Group’s Greenhouse Gas Emissions Scope 1). Downstream sites include three refineries, petrochemical facilities and power and heat generation sites.

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

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, b (Total fuel consumption from renewable sources), f. (Standards, methodologies, assumptions, and/or calculation tools used). In case of c/ii, iii, iv and d/ii, iii, iv. the data is available together. 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**302 ENERGY**

**302-2 Energy consumption outside of the organisation**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **N/A**

ANNUAL REPORT PAGE **N/A**

RT-CH-130a.1



REASON FOR OMISSION:

Disclosure on this indicator is under discussion, (data collection in 1-3 years). MOL Group does not disclose energy consumption outside of the organization, 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**302** ENERGY

**302-3** Energy Intensity

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE 152



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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**302** ENERGY

**302-4** Reduction of energy consumption

REPORTING PARTIALLY REPORTED

EXTERNAL ASSURANCE YES

ANNUAL REPORT PAGE 152-153



302-a  
Information about the amount and nature of reductions in energy consumption achieved, can be obtained through the current annual report (Energy and Taxonomy report section).

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

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

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

PARTIALLY REPORTING EXPLANATION:

MOL Group currently 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 CO<sub>2</sub> equivalents, and not in Gigajoules as prescribed by the GRI Standards. Disclosure of these is under consideration (data collection in 1-2 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**302 ENERGY**

**302-5 Reductions in energy requirements of products and services**

REPORTING **OMITTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  RT-CH-130a.1  

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>

REASON 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), information is unavailable currently however, disclosure on this indicator is under discussion, (data collection in 1-3 years).

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**303 WATER AND EFFLUENTS**

**303-1 Interactions with water as a shared resource**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-140a.1/ RT-CH-140a.3  

**303-1 a**  
The oil and gas industry, consumes large amounts of water (refining and petrochemical technologies being the most water intensive operations) 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>

**303-1 b**  
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, MOL Group has additionally set up requirements for water savings and water protection.

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

**303-1 c**  
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>

**303-1 d**  
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	<b>YES</b>	NAME OF INDICATOR	Water
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**303** **WATER AND EFFLUENTS**

**303-2** **Management of water discharge-related impacts**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB: EM-EP-140a.2 / RT-CH-140a.1 | TCFD: 6, 12, 13, 14, 15

303-2 a  
The oil and gas industry, consumes large amounts of water (refining and petrochemical technologies being the most water intensive operations) 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 additional information is not available.

SUPPORTING DATA: N/A | NAME OF INDICATOR: N/A

LINK: N/A | EXCEL SHEET: N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**303** **WATER AND EFFLUENTS**

**303-3** **Water withdrawal**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-140a.1/ EM-RM-140a.1/ RT-CH-140a.1  **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 megalitres are reported according to the required breakdown by the standard.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Water Withdrawal – Total/Water Withdrawal – by business/Water Withdrawal – by country, Non-fresh water withdrawal
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**303** WATER AND EFFLUENTS

**303-4** Water discharge

REPORTING: PARTIALLY REPORTED    EXTERNAL ASSURANCE: YES    ANNUAL REPORT PAGE: N/A    /    SASB EM-RM-140a.1/ EM-EP-140a.2    UN SDG 6, 12, 13, 14, 15    TCFD

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>

PARTIALLY 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).

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	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**303** WATER AND EFFLUENTS

**303-5** Water consumption

REPORTING: FULLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB: EM-EP-140a.1 / EM-RM-140a.1 | UN SDG: 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.

303-5-c (Change in water storage) -- MOL Group does not have water storage facilities since, water storage does not have significant water-related impact.

303-5-d - Information on data compilation.

MOL Group calculates water consumption (fresh and non-fresh waters are considered): the total water discharge is deducted from the total water withdrawal. Data is partially measured, the rest is estimated.

Measurements are available where the organization has its own wastewater treatment or physical or mechanical pre-treatment exists, the amount is estimated where the water is treated outside of the boundary of the reporting organization.

<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.

SUPPORTING DATA	YES	NAME OF INDICATOR	Water Consumption – Total (New Indicator – Disclosure Introduced in 2019)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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**



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

REASON FOR OMISSION:

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 or Nature conservation 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 labeled as an emerging topic in the company's Materiality Assessment.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**304** **BIODIVERSITY**

**304-2** **Significant impacts of activities, products, and services on biodiversity**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **N/A**

ANNUAL REPORT PAGE **N/A**



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

REASON FOR OMISSION:

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 labeled as an emerging topic in the company's Materiality Assessment.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**304** **BIODIVERSITY**

**304-3** **Habitats protected or restored**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **N/A**

ANNUAL REPORT PAGE **N/A**



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

REASON FOR OMISSION:

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 labeled as an emerging topic in the company's Materiality Assessment.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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**



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

REASON FOR OMISSION:

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 labeled as an emerging topic in the company’s Materiality Assessment.

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

LINK **N/A** EXCEL SHEET **N/A**





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**305** EMISSIONS

**305-1** Direct (Scope 1) GHG emissions

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE 155 / SASB EM-RM-110a.1/EM-EP-110a.1 UN SDG 12 13 15 TCFD S M

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 2023 is 6.64 tonnes of CO<sub>2</sub>eq.

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 CO<sub>2</sub> (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 CO<sub>2</sub> 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](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\\_reportnig\\_3rd\\_ed\\_2016.pdf](http://www.ipieca.org/media/2849/og_industry_guidance_on_voluntary_sustainability_reportnig_3rd_ed_2016.pdf)

305-1 b

For the accounting of Scope 1 emissions, MOL Group only reports for carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>) emissions. Accounting and reporting of the other five greenhouse gases covered by the Kyoto Protocol – nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>) – 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 Quantise, 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 CO<sub>2</sub> 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: In its Scope 1 calculation, MOL Group does not account for Biogenic CO<sub>2</sub> emissions - Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent - data is not available for the 2023 reporting period

SUPPORTING DATA YES NAME OF INDICATOR Total Direct GHG (Scope-1)

LINK DATA LIBRARY EXCEL SHEET CLIMATE CHANGE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**305** EMISSIONS

**305-2** Energy indirect (Scope 2) GHG emissions

REPORTING FULLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE 155 / SASB EM-RM-110a.1 / EM-EP-110a.1 UN 12 13 15 TCFD S M

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 2 emission calculation is 2019, in accordance with the MOL Group 2030+ strategy. The MOL Group data for 2023 is 0,61 mn tonnes of CO2eq for location based and 0,81 mn tonnes of CO2eq for market based Scope 2 emissions.

305-2 c  
Gases included in the calculation: CO<sub>2</sub>, CH<sub>4</sub>

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 CO<sub>2</sub> equivalent (CO<sub>2</sub>e). 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](https://www.aib-net.org/sites/default/files/assets/facts/residual-mix/2018/AIB_2018_Residual_Mix_Results_v1_1.pdf)  
IPIECA: [http://www.ipieca.org/media/2849/og\\_industry\\_guidance\\_on\\_voluntary\\_sustainability\\_reportnig\\_3rd\\_ed\\_2016.pdf](http://www.ipieca.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](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](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 CO<sub>2</sub> 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



**305 EMISSIONS**

**305-3 Other indirect (Scope 3) GHG emissions**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 156 / **S** **M**

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 and the Annual Report 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 gross footprint (GHG removals not included) of the biofuel produced externally and purchased for the blending into the Group's fuel. In line with EU regulation, each biofuel purchase transaction includes the CO<sub>2</sub> footprint of its production. For the calculation of CO<sub>2</sub> emissions, MOL Group uses the average-data method calculation and applies CO<sub>2</sub> conversion factors from the Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources ([LINK](#)).
- Category 2.** Capital Goods (steel and concrete for construction): MOL Group includes in its Scope 3 calculation the footprint of the externally produced steel and concrete purchased by MOL Group. In 2023, major Downstream investments have been included in the calculation. For the calculation of CO<sub>2</sub> emission, MOL Group uses the average-data method calculation and applies CO<sub>2</sub> 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 and Scope 2 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 produced crude oil purchased by MOL for processing in the Group's refineries. For the calculation of GHG emission, MOL Group uses the distance-based method calculation and applies CO<sub>2</sub>eq conversion factors from the Greenhouse gas reporting: conversion factors used for the 2023 GHG calculation were obtained from the UK Government ([LINK](#)) and CEFIC ([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.
- Category 7.** Employee Commuting: This is not a material source of Scope 3 emissions in MOL Group's value chain. Those commuting using MOL Group fleet cars are accounted for under Scope 1.
- Category 8.** Upstream Leased Assets: Not relevant. An emissions figure is not calculated for this category as MOL Group does not lease upstream assets in the course of normal operations.
- Category 9.** Downstream Transportation and Distribution: This is not a material source of Scope 3 emissions in MOL Group's value chain given the integrated nature of MOL Group. Downstream logistics is accounted for under Scope 1 emission.
- Category 10.** Processing of Sold Products: MOL Group includes in its Scope 3 calculation the footprint of the processing of sold intermediate petrochemical products (used for plastic). For the calculation of GHG emission, MOL Group uses the average-data method calculation and applies CO<sub>2</sub>eq conversion factors based on product categories. Conversion factors used for the 2023 GHG calculation were obtained from a recent publication in Circular Economy and Sustainability ([LINK](#)) for polymer products.

CONTINUES ON NEXT SLIDE

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Total Indirect GHG (Scope-3)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE



**305 EMISSIONS**

**305-3 Other indirect (Scope 3) GHG emissions**

REPORTING: FULLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: 156 | SASB | UN SDG 12, 13, 15 | TCFD S M

- Category 11. Use of Sold Products (Refinery excl. naphtha).** As of 2023, for the CO<sub>2</sub> Emission Factor (conversion rates) of its different sold refinery products, MOL Group applies IPCC's emission factors for mobile [\(LINK\)](#) and stationary [\(LINK\)](#) combustion. The methodology includes references to “global warming potential” (GWP). MOL Group includes in the calculation the CO<sub>2</sub> impact of following sold products: natural gas, diesel, motor gasoline (petrol), jet fuel, heating oil, LPG, fuel oil and petroleum coke, but excludes naphtha as its byproducts are accounted for under Category 10 and 12. Sold fuels of biogenic origin are also excluded from the calculation. Sold fuel includes both own produced as well as purchased (traded) from third parties. As of 2020, MOL Group does no longer calculate with natural gas produced, but with natural gas sold for the CO<sub>2</sub>eq calculation.
- Category 12. End-of-Life Treatment of Sold Products (polymers):** This category includes the expected end-of-life emissions from polymer products sold during the accounting year, independent of the year in which they are actually disposed of. The Group’s petrochemical sales (2023 MOL Group sales are available from the 2019-2023 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 of LDPE, HDPE and PP, with the first two accounting for around half the sales. The Group’s polymers are manufactured by its two petrochemical plants in Hungary and Slovakia. As a result, most of the Group’s polymers (LDPE, HDPE and PP) are sold on European markets. LDPE and HDPE are mostly sold for the packaging industry, whereas PP is sold to the automotive, agriculture, construction and packaging industries. It is assumed that the products would be used and disposed of in the countries to which MOL Group sold them, therefore EU disposal statistics from Plastics Europe’s “The Circular Economy for Plastics - A European Overview” report [\(LINK\)](#) were applied for the end-of-life treatment of products based on their application: packaging, automotive, agriculture, construction and other. End-of-life treatment based emission factors used for the 2023 GHG emission calculation are based on a 2019 publication in Nature [\(LINK\)](#)
- 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.
- 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 CO<sub>2</sub> emissions - from the combustion or biodegradation of biomass - have not been incorporated into the calculation. In case of category 2. only CO<sub>2</sub> has been incorporated into the calculation, for the other categories CO<sub>2</sub>eq conversion factors have been used.

SUPPORTING DATA	YES	NAME OF INDICATOR	Total Indirect GHG (Scope-3)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**305** EMISSIONS

**305-4** GHG emissions intensity

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE 155-156



**12 13 15**



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 CO<sub>2</sub> 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: CO<sub>2</sub>, CH<sub>4</sub>

SUPPORTING DATA	N/A	NAME OF INDICATOR	Carbon Dioxide (CO2) Intensity – Downstream sites
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**305** EMISSIONS

**305-5** Reduction of GHG emissions

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE 150-151



**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 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 and to be updated after MOL Group Investor Call about Strategy Review (*MOL Group Capital Market Update – March 2024 – slide 12.*) 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
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**305** EMISSIONS

**305-6** Emissions of ozone-depleting substances (ODS)

REPORTING **OMITTED**

EXTERNAL ASSURANCE

ANNUAL REPORT PAGE N/A



12 13 15

TCFD

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

REASON FOR OMISSION:

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



**305 EMISSIONS**

**305-7 Nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), and other significant air emissions**

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-RM-120a.1 / EM-EP-120a.1/ RT-CH-120a.1	
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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), SO<sub>2</sub>, NO<sub>x</sub>, CO and Particulate Matter (PM) emissions. For SO<sub>x</sub>, NO<sub>x</sub>, 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 NO<sub>x</sub> 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 SO<sub>2</sub>, H<sub>2</sub>S, 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 (SO<sub>2</sub>), Nitrogen Oxides (NO<sub>x</sub>), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Particulate Matter (PM). Link and name of indicator below.

PARTIAL REPORTING EXPLANATION:

MOL Group monitors and reports on a range of air emissions as described above. However, MOL Group 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, SO<sub>2</sub>, NO<sub>x</sub>, 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 due to the new requirements of the CSRD regulation.

SUPPORTING DATA	YES	NAME OF INDICATOR	Sulphur Dioxide/Nitrogen Dioxide/Volatile Organic Compounds/Carbon Monoxide/Particulate Matter
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**306** **WASTE**

**306-1** **Waste generation and significant waste-related impacts**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

EM-EP-140a.2

**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 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**306** **WASTE**

**306-2** **Management of significant waste-related impacts**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

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

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, plant, in accordance with HSE Management System internal regulation.

306-2 b, 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. All relevant companies dealing with significant amount of waste have their own IT software to collect data regarding volume, type, hazardousness, recycled/disposed. It is also used for issuing transport documentation when the waste is transported to third parties for treatment. Detailed information on treatment is collected from the contractors on a yearly basis. Contracting is monitored by an HSE expert to ensure that the third party company has all the necessary licenses. Service providers that offer better recycling ratio are preferred during selection.

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**306** **WASTE**

**306-3** **Waste generated**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



**306-3 a**  
MOL Group does disclose total weight generated in tonnes. 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 the breakdown of this total by composition of the waste. The basis of this breakdown is the European Waste Catalogue 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**306** **WASTE**

**306-4** **Waste diverted from disposal**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



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.

306-4 e

Data can be obtained from the Data Library as linked below.

<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	<b>YES</b>	NAME OF INDICATOR	Total waste diverted from disposal by recovery operation / Total waste prevented
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**306** **WASTE**

**306-5** **Waste directed to disposal**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



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 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.

306-4 e  
Data can be obtained from the Data Library as linked below.

<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 by disposal operation**

LINK **DATA LIBRARY** EXCEL SHEET **ENVIRONMENT**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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** /   

MOL Group has an integrated system that deals with all supplier-related information, from the qualification phase to the contracting stage. It is obligatory for all new suppliers to be screened using a number of environmental criteria. These 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. Furthermore, MOL Group Procurement 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 related developments 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.

All new procedures suppliers must accept and act according to Code of Responsible Procurement, making it part of the contractual relationship. Contractor post evaluation system also supports contractor performance evaluation.

End of 2022 Procurement organization has also launched its direct Supplier engagement program to assess strategic suppliers' climate performance, identify new sustainable opportunities and innovations. Opportunities are being assessed and once business case is demonstrated than opportunities are implemented.

**In 2023, 79.8 % of new suppliers were screened using environmental criteria.**

SAP Ariba: [LINK](#)  
Supplier Qualification Process [LINK](#)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**308 SUPPLIER ENVIRONMENTAL ASSESSMENT**

**308-2 Negative environmental impacts in the supply chain and actions taken**

REPORTING: FULLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB | TCFD | 8 | 12

308-2 a, b, e

MOL Group conducts HSE (incl. environmental) evaluation for all contractors and screen new suppliers using environmental criteria. In 2023, 1406 suppliers have been assessed for environmental impact and 320 suppliers considered high risk supplier based on the Sustainability questionnaire responses. MOL Group will improve its reporting system to register actions and improvement plans on group level. In 2023 there was no suppliers whose relationships were terminated due to negative environmental impact as a result of the assessment.

308-2 c

In the supplier environmental assessment MOL Group mainly focus on the climate related objectives and supply chain related CO2 emission.

308-d

Mol Group has assessed „hot spots” supplier based on CO2 emission and selected the top 50 supplier with whom further collaboration is planned. In February we invited those suppliers and shared our Sustainability strategy and climate targets. During 2024 engagement meetings will continue to identify further emission reduction opportunities and corrective actions. Furthermore, MOL Group Procurement implemented its Supplier enabled innovation program in 2022 to accelerate sustainable development in the supply base and to expand capabilities and collaboration within the company. During this period (2022 2H, 2023) 47 Sustainability opportunities have been identified and 12 have already been implemented which resulted in 4400 Tonnes of CO2 emission saving. It resulted in not just positive sustainability impact but also financial benefits due to more efficient resource use and energy saving. It extended procurement professionals’ knowledge and ability to influence the company’s environmental and social impact. They built strong relationship with supplier who shares the same values and collaborated to reduce emissions.

During 2022 period the questionnaire responses are analysed manually, and development plans identified and agreed with the suppliers. As a result, we have updated the ESG survey in the end of 2023 and in 2024 we will assess and evaluate the suppliers accordingly, which will serve as a basis for the CO2 emission reduction strategies.

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/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/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>

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**401** **EMPLOYMENT**

**401-1** **New employee hires and employee turnover**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 149 /  TR-RO-320a.3  

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, which was postponed to January 2024. Sustainable Engagement score reached 81%. Analysis will be broken down based on the following categories: age groups, gender, management level and countries (while the results of these breakdowns are not publicly available) and potential actions will be defined.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	New hires total (incl. by region, gender and age) / Turnover Rate (incl. by voluntary vs involuntary, gender and age)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**401** **EMPLOYMENT**

**401-2** **Benefits provided to full-time employees that are not provided to temporary or part-time employees**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  TR-RO-320a.3  

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. MOL Group doesn’t differentiate between full-time and part-time employees in the following elements: life insurance, health care, disability and invalidity coverage, parental leave. The company doesn’t have influence on retirement provision which depends on the working hours but given by governmental rule, not company ones. There is one differentiation in the cafeteria, all full-time employees receives the same gross amount in cafeteria and it is time-proportioned for part-time employees.

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

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**401** **EMPLOYMENT**

**401-3** **Parental leave**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



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.

MOL Group monitors and registers the following information which can be accessed through the Data Library:

- a. Total number of employees that were entitled to parental leave, by gender
- b. Total number of employees that took parental leave, by gender
- c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender
- d. 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
- e. Return to work and retention rates of employees that took parental leave, by gender

SUPPORTING DATA **YES** NAME OF INDICATOR **Parental leave by gender**

LINK **DATA LIBRARY** EXCEL SHEET **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**402** **EMPLOYMENT**

**402-1** **Minimum notice periods regarding operational changes**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 11.7.2.

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.

SUPPORTING DATA **YES** NAME OF INDICATOR **Minimum notice period(s) for trade unions regarding significant operational changes (weeks)**

LINK **DATA LIBRARY** EXCEL SHEET **PEOPLE**



**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		
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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/publications/sustainability/hse11-pd1-v3-eng.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 though 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/about-ina/profil-kompanije/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



**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		
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- 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 it 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 21 June 2023) 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 lace.  
 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 – MOL Group](#). 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 learned 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 rules 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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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  

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. Occupational health and medical service providers:

- carry out the fit for duty medical examinations specified in legislation and initiates the necessary specialist examinations,
- investigate occupational diseases, and increased exposure cases in accordance with the specific legislation,
- examine the health effects of work,
- provide personal protective equipment advice,
- provide information on the working conditions of employees,
- carry out periodic medical examinations for each occupational group,
- track the occupational health records of employees properly;
- take part in labor safety relevant pre-start-up safety reviews, and workplace hygiene inspections;
- conduct examination of the conditions of employment of workers with disabilities,
- investigate occupational diseases and suspicions, organize special investigations, and conduct statutory procedures,
- comply with all reporting obligations for occupational health,
- cooperate in defining and managing pandemic prevention and protection measures (in cooperation with further specific professional service providers).

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, Medicovert, 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**



**403 OCCUPATIONAL HEALTH AND SAFETY**

**403-4 Worker participation, consultation, and communication on occupational health and safety**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-320a.2		
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- 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 regular joint management-worker meetings, safety committees and forums at different Business/Company levels within the organization (at least on a quarterly basis) based on the local law and operational descriptions that describe the dispute resolution mechanism, the chairing responsibilities, and how the committee members are protected against reprisals. In general, the employees and also their representatives may not be subject to adverse legal consequences for acting in order to implement the requirements of safe work, or for reporting in good faith due to the employer’s perceived negligence. The law allows employees to exercise their right to participate in several ways, depending on the number of employees and the structure of the employer organization. For example, an election of safety representative must be held at all employers where the number of employees reaches 20 (in MOL and INA) or 10 (in Slovnaft) people. It is the employer’s responsibility to conduct the election and ensure the conditions. The safety representative is entitled to make sure that the requirements for safe work are enforced in the workplace, so in particular:
- about the safe condition of workplaces, work tools and personal protective equipment;
  - on the implementation of measures to protect health and prevent work accidents and occupational diseases;
  - on the preparation and preparedness of employees for safe work.
- For exercising their rights, safety representatives are allowed to
- enter workplaces in their operational area during working hours and get information from the employees working there;
  - participate in the preparation of the employer’s decisions that may affect the health and safety of employees,
  - request information from the employer on all issues affecting safe work;
  - express an opinion or initiate the necessary measures to be taken by the employer;
  - participate in the investigation of work accidents;
  - turn to the occupational health and safety authority with jurisdiction (in justified cases);
  - communicate their comments during official inspections to the person performing the inspection.
- If the number of safety representatives reaches three, a workplace occupational safety committee can be established. If a committee is established, the rights of the safety representatives will be exercised by the committee. Where safety representatives operate, the employer establishes a parity safety board, in which equal numbers of employees and employer representatives participate. The employer is obliged to appoint a senior employee entitled to make a decision to the board, as well as a person who partially or fully performs the employer’s occupational health and safety duties. The duties of the chairman of the board are exercised alternately by the representatives of the employees and the employers.
- European Works Councils (EWC) are information and consultation bodies representing employees in European multinational companies. MOL Groups’ councils have delegation.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**403 OCCUPATIONAL HEALTH AND SAFETY**

**403-5 Worker training on occupational health and safety**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 155-157 /  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 trainings 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 155-157, 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 21<sup>st</sup> century training method possibilities with the aim of higher training efficiency. The first already widely implemented solution was 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. Besides the general induction training, fire safety and slip&trip prevention is also available on this platform in all countries. The introduction of the similar e-learning platform (called: LEON) has started in other Business Units as well.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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  

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 lifestyle advice, dietary advice, stop 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. Different regular individual or group sport activities are supported inside or outside of company facilities (e.g., own sport events, participation in national and/or regional sport events, Hiking and health walk activities in groups by purchasing equipment, renting room, providing sport passes, paying participation fee, providing team T-shirts and/or refreshments, setting up a team tent, etc). For our colleagues travelling to and working in countries with a high risk or incidence of communicable diseases we conduct medical screening before travelling and after, and we supply the required vaccinations as well. MOL Group is providing 24/7 services for any potential medical evacuation (MEdEvac) needed around the globe for its expatriates and travellers, and in special situations the local employees of MOL operations if medically necessary, by contracting one of the leader service providers of the industry. Contractors of MOL Group are not covered by these initiatives.

<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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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  

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 6 of HSE MS, its details are available in the appendix 6B I. 2.1 Risk based approach and appendix 6B II. Safe operations and work practices.

HSE Management System available on the website:  
<https://molgroup.info/en/sustainability/our-commitments> under <https://molgroup.info/storage/documents/publications/sustainability/hse11-pd1-v3-eng.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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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  

- 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/publications/sustainability/hse11-pd1-v3-eng.pdf>

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**403 OCCUPATIONAL HEALTH AND SAFETY**

**403-9 Work-related injuries**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** / 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 154). 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).
- 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. The calculation methodology is described in the HSE Reporting Handbook which is internally available only for MOL Group relevant users p.8-10 <https://molgroup.info/en/sustainability/our-commitments>

PARTIALLY REPORTING EXPLANATION:

309-c-i. Risk/hazard assessments are carried out locally (not on MOL Group level) based on local legal requirements, so action planning are also done locally for work-related hazards that pose a risk of high-consequence injury.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Multiple Indicators incl. Fatalities: LTI, LTIF, TRIR, TROIF, LDR , AR and High-consequence work-related injuries
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	HEALTH & SAFETY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**403** **OCCUPATIONAL HEALTH AND SAFETY**

**403-10** **Work-related ill health**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-320a.1 / RT-CH-320a.2  

- a. MOL Group did not register any occupational illnesses for all employees during 2023. 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.). Risk/hazard assessments are carried out locally, action planning (incl. using the hierarchy of controls) are also done locally for work-related hazards that pose a risk of ill health. See the workplace risk assessment documents. 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 p.8-10 on the website on page <https://molgroup.info/en/sustainability/our-commitments>

**PARTIALLY REPORTING EXPLANATION:**

MOL Group does not disclose number of fatalities (403-10-b-i) and recordable cases (403-10-b-ii) as a result of work-related ill-health, and also not the main types of work-related ill health cases (403-10-b-iii), of other people than employees, since the management of this is employers' right and task by law.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



404	<b>TRAINING AND EDUCATION</b>
404-1	<b>Average hours of training per year per employee</b>

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/			
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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:

[Job Search \(taleo.net\)](#)

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>

**PARTIALLY REPORTING EXPLANATION:**

404-1-a-ii not disclosed, as information is not available at this stage Disclosure is under discussion – reporting of this indicator expected in the next 1-3 years. 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. Further disclosure on this indicator is under consideration.

SUPPORTING DATA	YES	NAME OF INDICATOR	Average Hours of Training per Employee Group		
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE		



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**404 TRAINING AND EDUCATION**

**404-2 Programs for upgrading employee skills and transition assistance programs**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-320a.2  **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 LEAD 2023 48 colleagues were selected to participate in the program [Leadership Development - MOLGroup \(molgroupcareers.info\)](https://molgroupcareers.info/en/our-business/downstream/petchem/72-career/career-and-dvelopment/263-technical-professional-development)
- Technical Capability and Career Development / Growing Professional Skills program: 1700 white collar colleagues are enrolled in the program <https://molgroupcareers.info/en/our-business/downstream/petchem/72-career/career-and-dvelopment/263-technical-professional-development>

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**404 TRAINING AND EDUCATION**

**404-3 Percentage of employees receiving regular performance and career development reviews**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   **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 1<sup>st</sup> 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>

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Employees covered by a predefined and standardized performance appraisal process (by employee category)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE





**405 DIVERSITY AND EQUAL OPPORTUNITY**

**405-1 Incidents of discrimination and corrective actions taken**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB | 5 8 | TCFD

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, colour, 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](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 (40.0%), Croatian (35.4%), Slovakian (13.3%), Bosnian (4,0%), Pakistani (1.5%), and Others (5,9%)

**PARTIALLY REPORTING EXPLANATION:**

405-1-a/iii and 405-1-b/iii are not disclosed, no available data at the moment. Further disclosure on this indicator is under discussion (expected in the next 1-3 years).

SUPPORTING DATA	YES	NAME OF INDICATOR	Composition of Governance Bodies by Gender, Citizenship and Age Group; Breakdown of employees by employee category (according to gender, age group)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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** /   

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 **PEOPLE**



**406 NON-DISCRIMINATION**

**406-1 Incidents of discrimination and corrective actions taken**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB | SDG 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.

MOL Group is committed to prohibiting and preventing discrimination of any kind, such as but not limited to discrimination based on race, colour, gender, age, language, religion, political or other opinion, ethnic or national or social origin, property, birth, sexual orientation or any other status including matrimonial or parental status, and to providing equal opportunities to everyone, based on merit, except when particular professional ability can justify selection.

MOL Group Code of Ethics: [https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

Business Partner Code of Ethics: [https://molgroup.info/storage/documents/sustainability/business\\_partner\\_code\\_of\\_ethics/business\\_partner\\_code\\_of\\_ethics\\_2017\\_english.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>

**PARTIALLY REPORTING EXPLANATION:**

MOL Group does not disclose these points due to confidentiality reasons  
 -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, MOL Group publishes cumulated statistics on the remediation actions we take, but not case-specifically due to confidential reasons.

SUPPORTING DATA	YES	NAME OF INDICATOR	Topics of Ethics Complaints (Whistle-Blower Reports) - Total
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**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	N/A	ANNUAL REPORT PAGE	N/A	/			
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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).

Business Partner Code of Ethics is part of all supplier and other contracts with business partners, which contains worker's rights, the right to form and join a trade union and collective bargaining.

Group’s Code of Ethics and Business Conduct

[https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](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](https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf)

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>

REASON 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 the data non-availability. Disclosure on the previously mentioned points are under discussion.

SUPPORTING DATA	YES	NAME OF INDICATOR	Freedom of Association / Employees with Potential Access to Trade Union Membership
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	HUMAN CAPITAL



**408 CHILD LABOR**

**408-1 Operations and suppliers at significant risk for incidents of child labor**

REPORTING	OMITTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/				
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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.

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. To further improve social risk management in the supply chain, Procurement organization will implement an efficient supply chain mapping tool in 2023.

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*).

MOL Group respects and applies the International Labour Standards on Child labour by the International Labour Organization (ILO), specifically the Minimum Age Convention, 1973 (No. 138) and the Worst Forms of Child Labour Convention, 1999 (No. 182).

Group’s Code of Ethics and Business Conduct: [https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](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](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>

REASON FOR OMISSION:

Indicator 408-1 a-b-c is not disclosed, information unavailable at the moment, as there is no area of operation where there is a significant risk for incidents of child labour. Further disclosure on this indicator is under discussion, (data collection in 1-2 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**409 FORCED AND COMPULSORY LABOR**

**409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor**

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A			
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MOL Group exposure to the risk of forced or compulsory 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. 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](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](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>

PARTIALLY 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



**410 SECURITY PRACTICES**

**410-1 Security personnel trained in human rights policies or procedures**

REPORTING **OMITTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE 161 / 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](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](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 161:  
<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



**411 RIGHTS OF INDEGENOUS 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	
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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.

However, MOL Group does not operate in countries where the rights of indigenous people may be at risk, MOL Group Code of Ethics and Business Conduct provides for the protection of indigenous people 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.”)

MOL Group understanding of indigenous people is aligned with the UN definition: [https://www.un.org/esa/socdev/unpfii/documents/5session\\_factsheet1.pdf](https://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.*

[HSE Management System \(molgroup.info\)](https://molgroup.info)

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](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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**413 LOCAL COMMUNITIES**

**413-1 Operations with local community engagement, impact assessments, and development programs**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A | SASB CG-MR-410a.2 | 12 | TCFD

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 properly – 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 Tiszaújváros (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). In 2023 we are extending this programme to all relevant operational site, along with a group level grievance management process. These will be rolled out throughout the operation in the coming years.

**PARTIALLY 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 that very community. 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, 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](#)

*Community engagement is a new materil topic based on the FY2023 materiality assessment. Since, ensuring the compliance of the addicitional GRI standard requirements necessitate setting up new internal processes. Full discolsure is expected in the next 1-2 in alignment with the new CSRD requirements.*

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**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	N/A	/	RT-CH-210a.1 / EM-EP-210a.3 / ER-RM-120a.2		
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 11.15.3

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**414** **SUPPLIER SOCIAL ASSESSMENT**

**414-1** **New supplier that were screened using social criteria**

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

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.

Procurement organization has also implemented a blacklisting process that seeks to prevent MOL Group Companies from doing business with persons, business, organizations or entities who abuse the supply chain management system by committing a corrupt, fraudulent, unfair or irregular practice or default on any contract wilfully or negligently by develop a uniform criterion and a fair process or the country/region where they operate became sanctioned. The blacklisting is based on the Performance Evaluation and on continuous monitoring of watchlists, such as Sanctions lists, Political Exposure lists, Police Orders, Negative news.

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 2023. 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/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/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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**414** **SUPPLIER SOCIAL ASSESSMENT**

**414-2** **Negative social impacts in the supply chain and actions taken**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



MOL Group conducts HSE evaluation for all contractors and screen new supplier using number of social criteria., however does not have a proven practice for reporting the GRI requested details.

As a result of social assessment and HSE evaluation, no relationship were terminated due to negative social impact.

PARTIALLY REPORTING EXPLANATION:

412-2 a.d.e. points are not disclosed. MOL Group does not have a proven practice for reporting the GRI requested details. Procurement organization has on its agenda to further develop the reporting process in 2024.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**415** **PUBLIC POLICY**

**415-1** **Political contributions**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-530a.1

 **16**



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**



**416 CUSTOMER HEALTH AND SAFETY**

**416-1 Assessment of the health and safety impacts of product and service categories**

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A	CG-MR-410a.2	12	
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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://molgroupchemicals.com/en/products>
  - MOL-LUB: <https://mollubricants.com/en/lubricants-autochemicals>
  - Slovnaft: <https://slovnaft.sk/en/about-us/sustainable-development-and-hse/health-and-safety/reach/>
  - INA: <https://www.ina.hr/en/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](http://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 240 substances listed on the Candidate List.

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 fulfil MOL Group’s commitment to sustainability.

**PARTIALLY REPORTING EXPLANATION:**

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. Further disclosure on this indicator is under consideration (disclosure expected in the next 1-3 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 416-1

a.-b. During 2023, 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**



**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	
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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 lubricants and autochemicals contain brand name, product category, volume, benefit and/or hint for application. Back labels contain all other information according to legal requirements. MOL Lubricants 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 date, batch number, QR code 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 Lubricants has presence in more than 50 countries around the world. Obligatory texts can be written in ~24 languages. If a country has particular regulations MOL Lubricants completes the text with special requirements.

**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. In order to ensure it we are cooperating with third party quality partners as well like SUD-TUV or SGS.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**417** **MARKETING AND LABELLING**

**417-2** **Incidents of non-compliance concerning 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’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:

**LUBRICANTS:** No incidents of non-compliance concerning product and service information and labelling were recorded during 2023.

**FUEL:** No incidents of non-compliance concerning product and service information and labelling were registered during 2023.

**NON-FUEL:** No incidents of non-compliance concerning product and service information and labelling were registered during 2023.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**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 2023, 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.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**418** **CUSTOMER PRIVACY**

**418-1** **Substantiated complaints concerning breaches of customer privacy and losses of customer data**

REPORTING **PARTIALLY REPORTED** 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.

The system in which data breaches are managed in MOL Group is the Archer system, operated by the data breach coordinator where reported incidents are mapped, investigated and assessed in collaboration with partner departments. Each incident is assessed from the Legal, Compliance and CyberSecurity side and approved at the end by the DPO (data protection officer), within MOL Group. If a data breach is suspected, it should be reported to the Data Breach Submission Form or [databreach@mol.hu](mailto:databreach@mol.hu) after the data breach has been detected.

There were a total of 8 substantiated complaints received concerning breaches of customer privacy in 2023. The majority of the incidents were breach of confidentiality with 1 breach of integrity.

Two incidents were reported to The National Authority for Data Protection and Freedom of Information (NAIH) in 2023.

Further information can be obtained via the following 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](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)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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# SECTOR STANDARD

GRI 11



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.1** **Disclosure 3-3 Management of material topics**

REPORTING	<b>FULLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A	/	EM-EP-110a.1 / EM-RM-110a.1		
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305

At the Upstream division we focus on reducing the amount of flared and vented hydrocarbons and internal gas consumption. Even though Upstream does not have as significant emissions as Downstream (Refining or Petrochemicals), our goal is to continuously decrease emissions here as well. Since 2015, MOL Group is a signatory party to the Zero Routine Flaring Initiative of World Bank. <https://www.worldbank.org/en/programs/zero-routine-flaring-by-2030/endorsers>

Additional information concerning GHG emissions at MOL Group can be obtained through the following links:

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

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

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.2** **Disclosure 302-1 Energy consumption within the organisation**

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	149				
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 302

302-1 c, 302-1 d, 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 though the following link:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> (page 149.)

MOL Group does not use coal/lignite as a source of fuel/energy for any of its Downstream sites (Downstream makes up 85% of the Group’s Greenhouse Gas Emissions Scope 1). Downstream sites include three refineries, petrochemical facilities and power and heat generation sites.

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

**PARTIALLY 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, b (Total fuel consumption from renewable sources), f. (Standards, methodologies, assumptions, and/or calculation tools used) and g. (Source of the conversion factors used). In case of c/ii, iii, iv and d/ii, iii, iv. the data is available together. 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	<b>YES</b>	NAME OF INDICATOR	Direct energy consumption / Indirect energy consumption / Energy consumption - by business
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.3** **Disclosure 302-2 Energy consumption outside of the organisation**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 302

REASON 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>

Further disclosure on this indicator is under discussion, (data collection in 1-3 years).

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.4** **Disclosure 302-3 Energy intensity**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /     **M**

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 302

302-3 a, 302-3 b, 302-3 c, 302-3 d  
As an integrated oil and gas company, MOL Group has a robust 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	<b>YES</b>	NAME OF INDICATOR	Total Energy Consumption – by business (production weighted)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.5.** **Disclosure 305-1 Direct (Scope 1) GHG emissions**

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	149	/	EM-EP-110a.1 / EM-RM-110a.1		
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305

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). The emitted amount of methane is reported under the GHG emission figures.

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:

Additional information concerning GHG emissions at MOL Group can be obtained through the following links:

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

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

**PARTIALLY REPORTING EXPLANATION:**

Reporting the breakdown of gross direct (Scope 1) GHG emissions by type of source is under consideration (disclosure is expected in 1-3 years).

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Methane (CH4)
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.6** **Disclosure 305-2 Energy indirect ( Scope 2 ) GHG emissions**

REPORTING	<b>FULLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	149				
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305

For more information, please see disclosure 305-2

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Total Indirect GHG (Scope-2) – Location based / Total Direct GHG (Scope-2) – Market based
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	CLIMATE CHANGE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.7** **Disclosure 305-3 Other indirect (Scope 3) GHG emissions**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE 149



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305

For more information, please see disclosure 305-3

SUPPORTING DATA **YES** NAME OF INDICATOR **Total Indirect GHG (Scope-3)**

LINK [DATA LIBRARY](#) EXCEL SHEET **CLIMATE CHANGE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.1** **GHG EMISSIONS**

**11.1.8** **Disclosure 305-4 GHG emissions intensity**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE 149



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305

For more information, please see disclosure 305-4

SUPPORTING DATA **YES** NAME OF INDICATOR **Carbon Dioxide (CO2) Intensity – Downstream sites**

LINK [DATA LIBRARY](#) EXCEL SHEET **CLIMATE CHANGE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.2 CLIMATE ADAPTATION, RESILIENCE, AND TRANSITION**

**11.2.1 Disclosure 3-3 Management of material topics**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-110a.3 / EM-RM-110a.2		
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MOL Group report the level and function that has been assigned responsibility for managing risks and opportunities due to climate change which includes the board's oversight - can be obtained in the Integrated Annual Report under the section "integrated Corporate Risk Management" through the following link:

[mol\\_group\\_integrated\\_report\\_2021\\_eng.pdf \(molgroup.info\)](#)

Climate change related scenarios and information regarding to the transition to a low-carbon economy can be obtained through the following links:

[mol\\_group\\_integrated\\_report\\_2021\\_eng.pdf \(molgroup.info\)](#)

[Strategy 2030+ - MOLGroup](#)

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.2 CLIMATE ADAPTATION, RESILIENCE, AND TRANSITION**

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

REPORTING	<b>PARTIALLY REPORTED</b>	EXTERNAL ASSURANCE	<b>YES</b>	ANNUAL REPORT PAGE	N/A	/				
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**Information regarding MOL Group’s Downstream operations:**

As operators in a high-risk industry MOL Group is committed to manage and maintain its risks within acceptable limits. Therefore an Enterprise Risk Management System (ERM) has been developed under which all significant risks, including climate change related risks are identified, assessed, evaluated, treated and monitored in the Group, covering all business and functional units. Climate change related risks (transitional and physical), are analysed, both in the long-term and mid-term risk review process. Detailed information can be found in the Annual Report - Corporate Risk Management section on [p.10](#)

MOL Group operates Risk Engineering program, where water related exposure is analysed in main Downstream sites. It was also analysed by the Group within the risk review processes, how water-related risks such as flood, drought and extreme rainfall affect the Group’s operations, e .g. the impact of switching to rail transport in the event of a draught, when barge transport is hindered, on the Group’s EBITDA. Based on the results and taking into account the mitigations level of Physical risk is considered as low/moderate. More information can be obtained from the link below:

[Publications - Investor Relations – MOLGroup](#)

**Information regarding MOL Group’s Upstream operations:**

MOL Group does not comprehensively keep record of the emissions potential of its current proven and probable reserves (2P reserves as per SPE-PRMS, 335 MMboe at YE 2023), thus data is not available. Upstream’s business within MOL Group in 2023 remained to be affected by climate change in a limited way as there was no early closure of our assets on account of climate-change related risks. Although the same applies to our core business as in 2023 our hydrocarbon production reached 90 mboepd, on the short term and based on our evaluations, we do not anticipate a material risk to oil and gas production. In the 2024 to 2028 period, we project that demand for our production will persist, and we will supply approximately current level of hydrocarbons, 90 thousand barrels of oil equivalent per day.

In 2023 MOL Group Upstream division spent 366 mn USD CAPEX across its portfolio, investing around 9% into exploration and 73% to development oil and gas projects.

MOL Group was granted two geothermal exploration licenses in Croatia and two in Hungary during 2023, no CAPEX spending was associated with these concessions during the year.

However, the transition of economies provides the opportunity to establish new ventures and technologies. Carbon capture, utilization and storage is a key pillar of our strategy, and through our Enhanced Oil Recovery programs in our core operating countries, Hungary and Croatia, are already applied at numerous fields. As a result, 66 million cubic meters and 110 million cubic meters of carbon dioxide emissions have been avoided in Hungary and Croatia, respectively, by injection and permanent storage in operating reservoirs. More information can be obtained through the following links:

[https://molgroup.info/storage/documents/publications/quarterly\\_reports/2023/presentation-of-q4-2023-results.pdf](https://molgroup.info/storage/documents/publications/quarterly_reports/2023/presentation-of-q4-2023-results.pdf)

Please visit the FY2023 Integrated Annual Report of MOL Group at [Publications - Investor Relations - MOLGroup](#)

**PARTIALLY REPORTING EXPLANATION:**

MOL Group does not disclose the operation/methods of its Risk Engineering program and the calculated EBITDA data. Disclosure is under consideration.

CONTINUES ON THE NEXT SLIDE

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.2 CLIMATE ADAPTATION, RESILIENCE, AND TRANSITION**

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

REPORTING	PARTIALLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/				
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**Information regarding the percentage of CAPEX that is allocated to investments in:**

Within our E&P portfolio we are investing into prospection, exploration and development of new reserves. Based on FY 2023 spending it accounted for 21% of MOL Group total CAPEX.

During year 2022 MOL Group implemented projects in the field of renewables. Construction of solar power plants accounted for 0.3% of MOL Group total CAPEX, investments in wind energy accounted for 0.01% of MOL Group total CAPEX.

In 2023, a solar power plant has been installed and started to operate in Virje. The plant is expected to produce 12,225 MWh of electricity annually.  
<https://www.ina.hr/en/announcement/ina-becomes-a-producer-of-electrical-energy-from-renewable-sources/>

MOL Group is committed to decrease its CO2 footprint and putting focus on growing energy efficiency across its operations, although DAC (direct air capturing) technology related projects have not been implemented so far. However, in order to mitigate effect of climate change, in field of nature-based solutions (afforestation) MOL Group has a GreenBelt program in the CEE region: Slovakia, Croatia, Czech Republic, Romania, Serbia. The main objective of this program is activating communities through creating community green spaces.

In Hungary the MOL New Europe Foundation launched its 4-year national planting program with the cooperation of the Ministry of Agriculture, the National Forestry Association and the Association of Cities with County Rights in 2022, where a total of 7,000 trees were planted in cities across the country. As well as in 2022, MOL joined the Mastercard "Priceless Planet Coalition" initiative, where 50,000 trees were planted with our contribution

MOL Group has mandatory reporting obligation based on EU Taxonomy regulation from year 2022. During 2023 detailed assessment has been conducted in order to identify sustainable/green activities within our portfolio. One key pillar of the assessment is preparation a physical climate risk assessment of the relevant activities. Although MOL Group performed this task, and established an internal methodology, this did not require CAPEX investments. CAPEX can be associated in the future to the physical climate risk mitigation plans in case of identified significant climate risks.

In terms of internal carbon-pricing MOL Group incorporates carbon trajectory into investment decision processes. As part of a wider set of macro assumptions, MOL Group discloses its carbon price projections in its capital market releases: an ETS carbon price of EUR 100-140/t is forecasted by 2030.

**PARTIALLY REPORTING EXPLANATION:**

MOL Group does not disclose the operation/methods of its Risk Engineering program and the calculated EBITDA data. Disclosure is under consideration.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.2 CLIMATE ADAPTATION, RESILIENCE, AND TRANSITION**

**11.2.3 Disclosure 305-5 Reduction of GHG emissions**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP.110a.3 / EM-RM-110a.2			
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305-1, 305-2.

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 therefore, we report how the goals and targets for GHG emissions are set including the baseline, Scopes (1,2,3) activities and business relationships.

Additional information concerning MOL Group's 2030+ can be obtained through the following links:

[Our Commitments - Sustainability - MOLGroup](#)

[Reports and Data - Sustainability - MOLGroup](#)

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

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> p. 154.

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

Additional Information regarding corporate strategy, scenarios can be obtained through the following link:

[Publications - Investor Relations - MOLGroup](#)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.2 CLIMATE ADAPTATION, RESILIENCE, AND TRANSITION**

**11.2.4 Additional sector disclosures**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/				
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MOL Group's strategy and sustainability department and its regulatory & public affairs department both belong to the Group Strategic Operations and Corporate Development organization, which enables direct lines to make sure that MOL Group's strategy and stated policies are reflected during participation in public policy development and lobbying activities related to climate change. All relevant business departments are consulted to make sure that engagement is in line with MOL Group's strategic directions.

MOL Group is supportive of the overall climate targets and well as sectoral energy and climate policies of the European Union for 2030 and 2050, which are aligned with the Paris Agreement goals. The focus of public policy development and lobbying activities is to highlight the need to take into account the regional specificities and capabilities during the development of these policies, to ensure the transition of the Central and Eastern European region while maintaining security of energy supply. Industrial transformation requires the deployment of new technologies and therefore investment at a massive scale. MOL Group wishes to rely on smart and technology inclusive policies that create positive business cases for such investments.

As an example, on the Fit for 55 package MOL Group activities have focused on areas that need more efforts in the CEE region than in better developed countries, therefore our proposals focused on including all low-carbon technologies, creating more flexibility and graduality in accounting to enable compliance, without changing the objectives of the legislation. Focus areas included developing the necessary regulatory conditions for the uptake of hydrogen, increasing energy savings from all technologies, ensuring the gradual uptake of sustainable aviation fuels, creating a business case for carbon capture and storage.

MOL Group is a member of industry associations that participate in policy development on climate change, the most relevant ones at EU level being the EU refining industry (FuelsEurope), the EU Chemical industry Council (Cefic), and the International Association of Oil & Gas Producers (IOGP), all of which have stated support for the European Green Deal, have committed to contribute to addressing the global climate change challenge, and therefore published policy-related positions supporting climate neutrality, carbon pricing, policies creating market demand for low-carbon fuels and chemicals, and policies enabling the transition of energy-intensive industries and critical value chains, including carbon capture and storage. MOL Group takes part in the respective committees of these associations to develop the industry position, to ensure they are in line with the company's and the region's climate objectives. Additionally, Mol Group has joined to IPIECA (global oil and gas association for advancing environmental and social performance) Accelerator program together with its peer to elaborate more on Corporate Sustainability Reporting Directive (CSRD) requirement effective from next year 2025.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.3** AIR EMISSIONS

**11.3.1** Disclosure 3-3 Management of material topics

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

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

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

Information regarding the potential negative and positive impacts of each material topic can be obtained in the Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.3** AIR EMISSIONS

**11.3.2** Disclosure 305-7 Nitrogen oxides (NO ), sulfur oxides (SO ), and other significant air emissions

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

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





TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305  
For further details please see disclosure 305-7

SUPPORTING DATA **YES** NAME OF INDICATOR Sulphur Dioxide / Nitrogen Dioxide / Volatile Organic Compounds / Carbon Monoxide / Particulate Matter

LINK [DATA LIBRARY](#) EXCEL SHEET ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.3** **AIR EMISSIONS**

**11.3.3** **Disclosure 416-1 Assessment of the health and safety impacts of product and services**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 305,416

MOL Group is highly committed to health protection and to operate all the assets and technologies according to the Best Available Technique document recommendations (in those cases where it is available) or to fulfil the requirements of all the local regulations and laws.

The main pollutant substances are regularly monitored, and risk assessments are conducted for the employees also according to the internal regulations related to health protection.

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/publications/sustainability/hse11-pd1-v3-eng.pdf>

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.4** **BIODIVERSITY**

**11.4.1** **Disclosure 3-3 Management of material topics**

REPORTING

OMITTED

EXTERNAL ASSURANCE

N/A

ANNUAL REPORT PAGE

N/A



EM-EP-160a.1



6

12

14

15



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

REASON FOR OMISSION:

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 or Nature conservation 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 labeled as an emerging topic in the company's Materiality Assessment.

Disclosure on this indicator is under discussion. Expected in the next 1-3 years in alignment with the CSRD requirements.

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.4 BIODIVERSITY**

**11.4.2 Disclosure 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  

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

REASON FOR OMISSION:

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 or Nature conservation 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 labeled as an emerging topic in the company’s Materiality Assessment.

Disclosure on this indicator is under discussion. Expected in the next 1-3 years in alignment with the CSRD requirements.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.4** **BIODIVERSITY**

**11.4.3** **Disclosure 304-2 Significant Impacts of activities, products and services on biodiversity**

REPORTING **OMITTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A / SASB EM-EP-160a.2



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

REASON FOR OMISSION:

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 or Nature conservation 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 labeled as an emerging topic in the company's Materiality Assessment.

Disclosure on this indicator is under discussion. Expected in the next 1-3 years in alignment with the CSRD requirements.

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.4** **BIODIVERSITY**

**11.4.4** **Disclosure 304-3 Habitats protected or restores**

REPORTING	OMITTED	EXTERNAL ASSURANCE	N/A	ANNUAL REPORT PAGE	N/A	/			
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304-2 / 304-3 / 304-4

REASON FOR OMISSION:

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 or Nature conservation 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 labeled as an emerging topic in the company's Materiality Assessment.

Disclosure on this indicator is under discussion. Expected in the next 1-3 years in alignment with the CSRD requirements.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
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LINK	N/A	EXCEL SHEET	N/A
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**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.4 BIODIVERSITY**

**11.4.5 Disclosure 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



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 304  
For further information please see disclosure 304-4

REASON FOR OMISSION:

Biodiversity is an emerging topic for MOL Group, therefore further disclosure on this indicator is under discussion. Expected in the next 1-3 years in alignment with the CSRD requirements.

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.1** **Disclosure 3-3 Management of material topics**

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



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

Information regarding the potential negative and positive impacts of each material topic can be obtained in the 2022YE Materiality Assessment Report and this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.2** **Disclosure 306-1 Waste generation and significant waste-related impacts**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 306  
For further details please see disclosure 306-1

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.3** **Disclosure 306-2 Management of significant waste-related impacts**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-RM-150a.2



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 306  
For further details please see disclosure 306-2

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Total Waste Generated / Total Waste Directed to Disposal and - Diverted From Disposal / Ratio of Reused / Recycled Waste
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.4** **Disclosure 306-3 Waste generated**

REPORTING	OMITTED	EXTERNAL ASSURANCE	N/A	ANNUAL REPORT PAGE	N/A	/	EM-RM-150a.1			
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 306

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.

REASON FOR OMISSION:

Omission refers to the additional sector specific requirements of the standard. The new structure of the GRI standard supports to follow the waste generation on a well detailed basis, therefore the recalculation of these indicators is not necessary and does not support the waste management and reduction targets and goals of MOL Group.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.5** **Disclosure 306-4 Waste diverted from disposal**

REPORTING	OMITTED	EXTERNAL ASSURANCE	N/A	ANNUAL REPORT PAGE	N/A	/				
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 306

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.

REASON FOR OMISSION:

Omission refers to the additional sector specific requirements of the standard. The new structure of the GRI standard supports to follow the treatment of the waste on a well detailed basis, therefore the recalculation of these indicators is not necessary and does not support the waste management and reduction targets and goals of MOL Group.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.5** **WASTE**

**11.5.6** **Disclosure 306-5 Waste directed to disposal**

REPORTING	OMITTED	EXTERNAL ASSURANCE	N/A	ANNUAL REPORT PAGE	N/A	/				
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 306

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.

REASON FOR OMISSION:

Omission refers to the additional sector specific requirements of the standard. The new structure of the GRI standard supports to follow the treatment of the waste on a well detailed basis, therefore the recalculation of these indicators is not necessary and does not support the waste management and reduction targets and goals of MOL Group.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.6** **WATER AND EFFLUENTS**

**11.6.1** **Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



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

Information regarding the potential negative and positive impacts of each material topic can be obtained in this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

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

LINK **N/A** EXCEL SHEET **N/A**





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.6** **WATER AND EFFLUENTS**

**11.6.2** **Disclosure 303-1 Interactions with water as a shared resource**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303  
For further details please see disclosure 303-1

SUPPORTING DATA **YES** NAME OF INDICATOR **Water**

LINK **DATA LIBRARY** EXCEL SHEET **ENVIRONMENT**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.6** WATER AND EFFLUENTS

**11.6.3** Disclosure 303-2 Management of water discharge-related impacts

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303

For further details please see disclosure 303-2

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS


**11.6** **WATER AND EFFLUENTS**

**11.6.4** **Disclosure 303-3 Water withdrawal**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

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



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303

For further details please see disclosure 303-3

SUPPORTING DATA **YES** NAME OF INDICATOR **Water Withdrawal – Total / Water Withdrawal – by business / Water Withdrawal – by country**

LINK **DATA LIBRARY** EXCEL SHEET **ENVIRONMENT**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.6** **WATER AND EFFLUENTS**

**11.6.5** **Disclosure 303-4 Water discharge**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-140a.2



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303

Data on the amount of water produced and discharged and its hydrocarbon content can be obtained from the Data Library.

For further details please see disclosure 303-4

PARTIALLY REPORTING EXPLANATION:

Partially reporting explanation refers to the additional sector specific requirements of the standard. MOL Group currently does not disclose the concentration of hydrocarbons discharged in produced water and process wastewater, only the amount of Total Petroleum Hydrocarbons (TPH) in tonnes. The future reporting of this data is currently under consideration.

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Contaminants; Produced Water – Upstream; Water Discharge
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.6** **WATER AND EFFLUENTS**

**11.6.6** **Disclosure 303-5 Water consumption**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-140a.1



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303

For further details please see disclosure 303-5

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Water consumed - Total
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	ENVIRONMENT



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7** **CLOSURE AND REHABILITATION**

**11.7.1** **Disclosure 3-3 Management of material topics**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-140a.1



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 303

For further details please see disclosure 303-5

For information regarding how MOL Group manages its material topics please visit indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7** CLOSURE AND REHABILITATION

**11.7.2** Disclosure 402-1 Minimum notice periods regarding operational changes

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 402-1

Number of weeks notice provided will depend on the different jurisdiction. Under the Hungarian Employment Code Section 264 (1) employers shall consult the works council at least 15 days prior to passing a decision in respect of any plans for actions and adopting regulations affecting a large number of employees. 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.

Where Collective Agreements are in place, the extent of consultation and the time periods are specified in the agreement. Based on the Collective Agreement currently in force the employer grants the right to prior comments to the trade unions for drafts of actions affecting major employee groups. In the event the trade union asks for information from the employer in issues related to the employees' economic, social and safety interests in connection with the employment and obtaining this information requires an extensive analysis or research, the employer shall give such information within 30 days following the receipt of the relevant request.

PARTIALLY REPORTING EXPLANATION:

MOL Group does not disclose information for indicator 11.7.2. as prescribed by the GRI Standards.

SUPPORTING DATA YES NAME OF INDICATOR Minimum notice period(s) for trade unions regarding significant operational changes (weeks)

LINK DATA LIBRARY EXCEL SHEET PEOPLE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7** CLOSURE AND REHABILITATION

**11.7.3** Disclosure 404-2 Programs for upgrading employee skills and transition assistance programs

REPORTING

PARTIALLY REPORTED

EXTERNAL ASSURANCE

YES

ANNUAL REPORT PAGE

N/A



TCFD

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 404

For further details please see disclosure 404-2

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7 CLOSURE AND REHABILITATION**

**11.7.4 Additional sector disclosures**

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE N/A



MOL Group entities are operated in a highly and strictly regulated environment, where the regulations and the operation permits contain the requirements that the entities have to comply with in case of closure of the given sites. The environmental authorities of the different countries where MOL Group has operations conduct regular site inspections and extraordinary inspections in case of closure and rehabilitation which can be found in the following link:

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

**Information regarding MOL Group’s Downstream operations:**

In 2023, within the Downstream division, in the Tisza Industrial complex a hazardous waste incinerator has been closed, the rehabilitation plans .

**Information regarding MOL Group’s Upstream operations:**

In Croatia, by the end of June 2023, Ivana-D well was successfully P&A and secured in a permanently safe state according to HSE professional standards. The gas pipeline was conserved in accordance with legal framework, and the steel structure of the platform remains on the seabed. An environmental impact study was done, and on February 5, 2024, INA submitted a request to the Ministry of Economy and Sustainable Development to carry out the environmental impact assessment. This study will serve as the foundation for the upcoming environmental impact assessment process.

The whole procedure takes about a year. Through the environmental impact assessment procedure, the Ministry will decide whether the platform structure can remain on the seabed as an artificial reef or must be removed and disposed of onshore.

For further details please visit the following links:

[https://molgroup.info/storage/documents/publications/quarterly\\_reports/2023/presentation-of-q4-2023-results.pdf](https://molgroup.info/storage/documents/publications/quarterly_reports/2023/presentation-of-q4-2023-results.pdf)

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

[Publications - Investor Relations – MOLGroup](#)

**PARTIALLY REPORTING EXPLANATION:**

The majority of MOL Group operation is covered by the European Union regulations that we need to comply with but further reporting on this indicator is under consideration (disclosure is expected in the next 1-3years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7** CLOSURE AND REHABILITATION

**11.7.5** Additional sector disclosures

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



In the financial year of 2023, in connection with MOL Group not a single decommissioned structures have been left in place.

For further information please visit the FY202 Integrated Annual Report of MOL Group [Publications - Investor Relations - MOLGroup](#)

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.7** CLOSURE AND REHABILITATION

**11.7.6** Additional sector disclosures

REPORTING **OMITTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   

In 2019 MOL Group has launched INA's Downstream 2023 New Course transformation program, within the framework of which, crude refining activity in Croatia was concentrated in the Rijeka Refinery, while Sisak Refinery conversed into an industrial site. Since 2019, the crude oil processing operation has ceased in Sisak, the site is being transformed into an industrial site. Until the transformation is completed, MOL Group has additional aftercare costs regarding Sisak, which is called Complex Maintenance Spending.

REASON FOR OMISSION:  
MOL Group Upstream, while making provisions for closure and rehabilitation

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.8 ASSET INTEGRITY AND CRITICAL INCIDENT MANAGEMENT**

**11.8.1 Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-540a.2/ EM-RM-540a.3



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

Information regarding the potential negative and positive impacts of each material topic can be obtained in the 2022YE Materiality Assessment Report and this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.8 ASSET INTEGRITY AND CRITICAL INCIDENT MANAGEMENT**

**11.8.2 Disclosure 306-3 Significant spills**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



To be read and understood in conjunction with GRI 306 and for further information please see disclosure 306-3

MOL Group’s philosophy about behaving responsibly towards stakeholders covers not just employees but communities and the environment as well. Based on this principle of responsibility, the prevention of hazardous spills and leakages is a key priority. The number and the volume of the spill events are available in the data library.

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

PARTIALLY REPORTING EXPLANATION:

Currently MOL Group does not report the cause of spills on a case-by-case basis, the future reporting of this data is under consideration.

SUPPORTING DATA **YES** NAME OF INDICATOR **Spills**

LINK **DATA LIBRARY** EXCEL SHEET **ENVIRONMENT**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.8 ASSET INTEGRITY AND CRITICAL INCIDENT MANAGEMENT**

**11.8.3 Additional sector disclosures**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-540a.1 / EM-RM-540a.1



During 2023, the number of TIER 1 Process Safety Events (PSE) reached 9 across the Group, a decrease from 13 cases registered in 2022. The number of TIER 2 Process Safety Events remained the same – 18 events during 2023.

Detailed information on MOL Group’s process safety events can be found in it’s annual report through this link:  
<https://molgroup.info/en/investor-relations/publications#nav-annual-reports>

SUPPORTING DATA **YES** NAME OF INDICATOR **Process Safety**

LINK **DATA LIBRARY** EXCEL SHEET **HEALTH&SAFETY**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.8** **ASSET INTEGRITY AND CRITICAL INCIDENT MANAGEMENT**

**11.8.4** **Additional sector disclosures**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-540a.1 / EM-RM-540a.1



REASON FOR OMISSION:  
MOL Group does not have oil sand mining operations.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9 OCCUPATIONAL HEALTH AND SAFETY**

**11.9.1 Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.2 / EM-RM-150a.2





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

Information regarding the potential negative and positive impacts of each material topic can be obtained in the 2022YE Materiality Assessment Report and this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

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

LINK **N/A** EXCEL SHEET **N/A**





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** OCCUPATIONAL HEALTH AND SAFETY

**11.9.2** Disclosure 403-1 Occupational health and safety management system

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.2 / EM-RM-150a.2



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-1

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS


**11.9 OCCUPATIONAL HEALTH AND SAFETY**

**11.9.3 Disclosure 403-2 Hazard identification, risk assessment, and incident investigation**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.2 / EM-RM-150a.2



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-2

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** OCCUPATIONAL HEALTH AND SAFETY

**11.9.4** Disclosure 403-3 Occupational health services

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.2 / EM-RM-150a.2



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-3

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9 OCCUPATIONAL HEALTH AND SAFETY**

**11.9.5 Disclosure 403-4 Worker participation, consultation, and communication on occupational health and safety**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.2 / EM-RM-150a.2



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-4

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** **OCCUPATIONAL HEALTH AND SAFETY**

**11.9.6** **Disclosure 403-5 Worker training on occupational health and safety**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



EM-EP-320a.1 / EM-EP-320a.2 / EM-RM-150a.2



**3** **8**



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-5

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** OCCUPATIONAL HEALTH AND SAFETY

**11.9.7** Disclosure 403-6 Promotion of worker health

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



EM-EP-320a.1 / EM-EP-320a.2 / EM-RM-150a.2



**3** **8**



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-6

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS


**11.9** **OCCUPATIONAL HEALTH AND SAFETY**

**11.9.8** **Disclosure 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 / EM-RM-150a.2





TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-7

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** **OCCUPATIONAL HEALTH AND SAFETY**

**11.9.9** **Disclosure 403-8 Workers covered by an occupational health and safety management system**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-8

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

LINK **N/A** EXCEL SHEET **N/A**





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** **OCCUPATIONAL HEALTH AND SAFETY**

**11.9.10** **Disclosure 403-9 Work-related injuries**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**

 EM-EP-320a.1 / EM-RM-320a.1



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-9

SUPPORTING DATA **YES** NAME OF INDICATOR **Multiple Indicators incl. Fatalities: LTI, LTIF, TRIR, TROIF, LDR , AR and High-consequence work-related injuries**

LINK **DATA LIBRARY** EXCEL SHEET **HEALTH & SAFETY**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.9** **OCCUPATIONAL HEALTH AND SAFETY**

**11.9.11** **Disclosure 403-10 Work-related ill health**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 403

For further information please see disclosure 403-10

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.1** **Disclosure 3-3 Management of material topics**

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



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

Information regarding the potential negative and positive impacts of each material topic can be obtained in the 2022YE Materiality Assessment Report and this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.2** **Disclosure 401-1 New employee hires and employee turnover**

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



TO BE READ AND UNDERSTOOD WITH GRI 401

For further information please see disclosure 401-1

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 **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.3** **Disclosure 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 401

For further information please see disclosure 401-2

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.4** **Disclosure 401-3 Parental leave**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 401

For further information please see disclosure 401-3

SUPPORTING DATA **YES** NAME OF INDICATOR **Parental leave by gender**

LINK **DATA LIBRARY** EXCEL SHEET **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.5** **Disclosure 402-1 Minimum notice periods regarding operational changes**

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



TO BE READ AND UNDERSTOOD WITH GRI 402

For further information please see disclosure 402-1

SUPPORTING DATA **YES** NAME OF INDICATOR **Minimum notice period(s) for trade unions regarding significant operational changes (weeks)**

LINK **DATA LIBRARY** EXCEL SHEET **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.6** **Disclosure 404-1 Average hours of training per year per employee**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 404

For further information please see disclosure 404-1

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Average Hours of Training per Employee Group
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.7** **Disclosure 404-2 Programs for upgrading employee skills and transition assistance programs**

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



TO BE READ AND UNDERSTOOD WITH GRI 404

For further information please see disclosure 404-2

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.8** **Disclosure 414-1 New suppliers that were screened using social criteria**

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



TO BE READ AND UNDERSTOOD WITH GRI 414

For further information please see disclosure 414-1

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.10** **EMPLOYMENT PRACTICES**

**11.10.9** **Disclosure 414-2 Negative social impacts in the supply chain and actions taken**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 414

For further information please see disclosure 414-2

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.1** **Disclosure 3-3 Management of material topics**

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



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 3-1 AND GRI 3-2 FOR INFORMATION REGARDING HOW MOL GROUP MANAGES THIS MATERIAL TOPIC, PLEASE SEE GRI INDICATOR 3-3

Information regarding the potential negative and positive impacts of each material topic can be obtained in this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.2** **Disclosure 202-2 Proportion of senior management hired from the local community**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 202

For further information please see disclosure 202-2

SUPPORTING DATA **YES** NAME OF INDICATOR **Ratio of senior executives (CEO, or HAY21 and above) with local citizenship to all senior executives (CEO, or HAY21 and above)**

LINK **DATA LIBRARY** EXCEL SHEET **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.3** **Disclosure 401-3 Parental leave**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 401

For further information please see disclosure 401-3

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.4** **Disclosure 404-1 Average hours of training per year per employee**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 404

For further information please see disclosure 404-1

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Average Hours of Training per Employee Group
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	PEOPLE



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.5** **Disclosure 405-1 Diversity of governance bodies and employees**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 405

For further information please see disclosure 405-1

SUPPORTING DATA **N/A** NAME OF INDICATOR **Composition of Governance Bodies by Gender, Citizenship and Age Group; Breakdown of employees by employee category (according to gender, age group)**

LINK **DATA LIBRARY** EXCEL SHEET **INTEGRITY&TRANSPARENCY; PEOPLE**





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.6** **Disclosure 405-2 Ratio of basic salary and remuneration**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 405

For further information please see disclosure 405-2

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 **PEOPLE**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.11** **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

**11.11.7** **Disclosure 406-1 Incidents of discrimination and corrective actions taken**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 406

For further information please see disclosure 406-1

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Topics of Ethics Complaints (Whistle-Blower Reports) – Total
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.12** **FORCED LABOR AND MODERN SLAVERY**

**11.12.1** **Disclosure 3-3 Management of material topics**

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

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 3-1 AND GRI 3-2 FOR INFORMATION REGARDING HOW MOL GROUP MANAGES THIS MATERIAL TOPIC, PLEASE SEE GRI INDICATOR 3-3

Information regarding the potential negative and positive impacts of each material topic can be obtained in this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.12** **FORCED LABOR AND MODERN SLAVERY**

**11.12.2** **Disclosure 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**



TO BE READ AND UNDERSTOOD WITH GRI 409

For further information please see disclosure 409-1

**PARTIALLY REPORTING EXPLANATION:**

Human Rights is a new material topic based on 2023 materiality assessment. Ensuring the compliance of the additional GRI standard requirements necessitate setting up new internal processes. Full disclosure is expected in the next 1-2 years in alignment with the new CSRD requirements.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.12** **FORCED LABOR AND MODERN SLAVERY**

**11.12.3** **Disclosure 414-1 New suppliers that were screened using social criteria**

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



TO BE READ AND UNDERSTOOD WITH GRI 414

For further information please see disclosure 414-1

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.13** **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

**11.13.1** **Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 3-1 AND GRI 3-2 FOR INFORMATION REGARDING HOW MOL GROUP MANAGES THIS MATERIAL TOPIC, PLEASE SEE GRI INDICATOR 3-3

Information regarding the potential negative and positive impacts of each material topic can be obtained in this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.13** **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

**11.13.2** **Disclosure 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**



TO BE READ AND UNDERSTOOD WITH GRI 407

For further information please see disclosure 407-1

REASON 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 the data non-availability. Disclosure on the previously mentioned points are under discussion, (data collection in 1-3 years).

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.1** **Disclosure 3-3 Management of material topics**

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



At Group level we operate the following programs:

- Talent support program - Arts, Sciences and Sport categories (exists in Romania, Slovakia,) with help of our partnership foundations we provide financial help for talented children by refunding the cost of equipment, special clothing, event registration or travel expenses. In Hungary we transferred this program to the MOL New Europe Foundation.
- GreenBelt program (Romania, Croatia, Slovakia, Czechia, Serbia) The main objective of this program is activating communities through creating community green spaces. Applicants should submit their ideas with budget proposal, and after a tender process –in case of selection- they can implement it. In every country we have a cooperation with trusted, well-known NGOs, who provide professional help in the tendering process
- Child healing program/grants (Romania, Croatia: children hospital donation) This programme operates in Romania, supporting institutions and non-profit organizations which promote the psycho-social rehabilitation of chronically ill children and also strive to help physically or mentally handicapped kids to recover. These institutions offer various alternative therapies and healing methods through drama, dancing, fine arts and film, while dogs and horses are also involved. In Croatia we support children hospitals.

Detailed Information available on the following webpage:

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

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.2** **Disclosure 201-1 Direct economic value generated and distributed**

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



TO BE READ AND UNDERSTOOD WITH GRI 201

For further information please see disclosure 201-1

Information on projects that generate direct economic value can be obtained through the following links:

<https://molgroup.info/en/investor-relations/publications#nav-annual-reports> Under "Shared Wealth & Economic Impact" section on page 165.

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

SUPPORTING DATA **YES** NAME OF INDICATOR **Economic**

LINK **DATA LIBRARY** EXCEL SHEET **INTEGRITY&TRANSPARENCY**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.3** **Disclosure 202-2 Proportion of senior management hired from the local community**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: YES | ANNUAL REPORT PAGE: N/A



TO BE READ AND UNDERSTOOD WITH GRI 202

For further information please see disclosure 202-2

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.4** **Disclosure 3-3 Management of material topics**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/			
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At Group level we operate the following programs:

- Talent support program - Arts, Sciences and Sport categories (exists in Romania, Slovakia,) with help of our partnership foundations we provide financial help for talented children by refunding the cost of equipment, special clothing, event registration or travel expenses. In Hungary we transferred this program to the MOL New Europe Foundation.
- GreenBelt program (Romania, Croatia, Slovakia, Czechia, Serbia) The main objective of this program is activating communities through creating community green spaces. Applicants should submit their ideas with budget proposal, and after a tender process –in case of selection- they can implement it. In every country we have a cooperation with trusted, well-known NGOs, who provide professional help in the tendering process
- Child healing program/grants (Romania, Croatia: children hospital donation) This programme operates in Romania, supporting institutions and non-profit organizations which promote the psycho-social rehabilitation of chronically ill children and also strive to help physically or mentally handicapped kids to recover. These institutions offer various alternative therapies and healing methods through drama, dancing, fine arts and film, while dogs and horses are also involved. In Croatia we support children hospitals.

Detailed Information available on the following webpage:

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

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.5** **Disclosure 203-2 Significant indirect economic impacts**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 203

For further information please see disclosure 203-2

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** **ECONOMIC IMPACTS**

**11.14.6** **Disclosure 204-1 Proportion of spending on local suppliers**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 204

For further information please see disclosure 204-1

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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** LOCAL COMMUNITIES

**11.15.1** Disclosure 3-3 Management of material topics

REPORTING PARTIALLY REPORTED EXTERNAL ASSURANCE YES ANNUAL REPORT PAGE N/A / SASB EM-EP-210b.1



MOL Group’s Social Engagement Group Practice sets the criteria, steps and methodologies to follow in establishing a relationship with the communities. The detailed methodology guide, which MOL Group extended in 2023 to all operational site with significant impact, is available on our website: [https://molgroup.info/en/show/case\\_studies/communities/mol\\_group\\_community\\_engagement\\_guide.pdf](https://molgroup.info/en/show/case_studies/communities/mol_group_community_engagement_guide.pdf)

MOL Group is currently working on the roll-out of the community engagement process to all significant sites and operations, so we expect more detailed information about this topic in the coming years. Currently in Hungary the Danube Refinery and Tisza-site has a community engagement plan that they follow in relation to the local communities.

In Bratislava Slovnaft refinery developed a mobile application to be able to proactively communicate to the local communities, while users can get in touch with the company via the app as well, not only the regular channels for grievances (email and phone to call center). This proved to be a best practice and in early 2024 the Danube Refinery will launch a similar application for the local community with the same purpose. Also, MPC is doing the same practice however they use the app Tiszaújváros has for their residents to proactively communicate the major events expected in the site.

Community engagement is a new material topic based on 2023 materiality assessment. Since, ensuring the compliance of the additional GRI standard requirements necessitate setting up new internal processes. Full disclosure is expected in the next 1-2 in alignment with the new CSRD requirements.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.14** LOCAL COMMUNITIES

**11.15.2** Disclosure 413-1 Operations with local community engagement, impact assessments, and development programs

REPORTING PARTIALLY REPORTED

EXTERNAL ASSURANCE YES

ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD WITH GRI 413

For further information please see disclosure 413-1

Community engagement is a new material topic based on 2023 materiality assessment. Since, ensuring the compliance of the additional GRI standard requirements necessitate setting up new internal processes. Full disclosure is expected in the next 1-2 in alignment with the new CSRD requirements.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.15** LOCAL COMMUNITIES

**11.15.3** Disclosure 413-2 Operations with significant actual and potential negative impacts on local communities

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-210b.1		
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 413-2

Understanding the environment in which we operate and minimizing our environmental footprint is critical to maintaining our legal and social license to operate. MOL Group is continuously working on avoiding, minimizing and mitigating environmental impacts in all of its areas of operation. We aim to improve our waste management and emission performance, manage our impact on water and biodiversity and address any related impact on local communities.

MOL Group entities are operated in a highly and strictly regulated environment, where the regulations and the operation permits contain the requirements that the entities have to comply with in case of closure of the given sites. The environmental authorities of the different countries where MOL Group has operations conduct regular site inspections.

Potential negative and positive impacts are identified mainly focusing on the areas around our operational sites and refineries (ex: Dunai Finomító, Rijeka, Pozsony). Odor measurements are continuously takes place via Enose. MOL Group tries to intervene as little as possible in the quality of life of local communities and provides information about its planned activities through the hello dufi app, where locals can also report any occurring issue.

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

Information on grievance management and its results can be obtained from our Integrated Annual Report's Communities section. <https://molgroup.info/en/investor-relations/publications#nav-annual-reports> - under "Community Engagement section" on page 160.

Community engagement is a new material topic based on 2023 materiality assessment. Since, ensuring the compliance of the additional GRI standard requirements necessitate setting up new internal processes. Full disclosure is expected in the next 1-2 in alignment with the new CSRD requirements.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.15** LOCAL COMMUNITIES

**11.15.4** Additional sector disclosures

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



The number of grievances identified from the community for each site is included in the data library. More detailed report on these grievances are currently not available. However, based on MOL Group's 2023 regulation about grievance management and process, we expect to have a more detailed report and more insight on this topic from next year.

SUPPORTING DATA **YES** NAME OF INDICATOR **Total number of grievances from local communities**

LINK **DATA LIBRARY** EXCEL SHEET **COMMUNITIES**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.16** **LAND AND RESOURCE RIGHTS**

**11.16.1** **Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-210b.1  

**Approach to engaging with affected vulnerable groups**

Communities - Sustainability – MOLGroup

Community Engagement Guide : [mol\\_group\\_community\\_engagement\\_guide.pdf](https://molgroup.info/mol_group_community_engagement_guide.pdf) ([molgroup.info](https://molgroup.info))

Structured community engagement is a process with supporting guidelines that allow: identification, anticipation and, where possible, control of the effects of stakeholder actions and reactions. If appropriately managed, community engagement will allow mitigation and containment of stakeholder-related risks and the capturing of opportunities that have the potential to create win-win situations for both the company and the communities. The Community Engagement Guide has been designed to give guidance to site-level managers on how to plan and implement successful community engagement activities, the results of which should become integral parts of the general action planning process.

Diversity and Inclusion Policy (HR5.5\_PD1):

The objective of Diversity and Inclusion process description is to make Diversity & Inclusion (D&I) a common responsibility throughout MOL Group. Our goal is to raise awareness about D&I principles to further support cultural diversity and the creation of an international business community. At MOL Group, as a socially responsible company: diversity and inclusion, equality and respect are embedded in our corporate culture and values, and are part of our Code of Ethics and Business Conduct.

**Approach to providing remediation to local communities or individuals subject to involuntary resettlement**

HSE Management System: <https://molgroup.info/storage/documents/publications/sustainability/hse11-pd1-v3-eng.pdf>

Element 9: Stakeholder & Community Relations

Open, proactive and effective HSE communication and consultation is maintained with stakeholders regarding the HSE aspects of all of our business activities.

Element 10: Incident Management

Systems are in place to ensure that all HSE incidents are reported, recorded, investigated and analysed in a timely manner to prevent recurrence and improve performance. Corrective and preventive actions are undertaken, its effectiveness is evaluated and learning outcomes are shared.

Corrective Action: Action designed to correct an undesirable HSE problem or defect in the management system. Examples may include breakdown of controls, non-conformance with MOL or regulatory requirements, accident, injury, illness, fire, release to the environment or other HSE-related loss, undesirable trends in HSE metrics, etc.

Community engagement is a new material topic based on 2023 materiality assessment. For more information, please see GRI indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.16** **LAND AND RESOURCE RIGHTS**

**11.16.2** **Additional sector disclosures**

REPORTING **OMITTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-210b.1



Information on how MOL Group manages involuntary resettlement and how peoples' livelihoods affected and restored can be obtained through the following link.  
Community Engagement Guide : [mol\\_group\\_community\\_engagement\\_guide.pdf \(molgroup.info\)](#)

REASON FOR OMISSION:

The full list of locations of operations that caused or contributed to involuntary resettlement are not publicly available due to its confidentiality, however disclosure on this indicator is under discussion, (data collection in 1-3 years.)

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.17** **RIGHTS OF INDIGENOUS PEOPLES**

**11.17.1** **Disclosure 3-3 Management of material topics**

REPORTING **OMITTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A / SASB EM-EP-210a.3



MOL Group Code of Ethics and Business Conduct provides for the protection of indigenous people 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.”)

MOL Group Code of Ethics and Business Conduct: [https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

REASON FOR OMISSION:

MOL Group does not operate in countries where the rights of indigenous people would be at risk, therefore – besides MOL Group’s commitment in the Code of Ethics to respect indigenous people's rights presented below – MOL Group does not have specific programs, trainings provided to indigenous peoples. Further disclosure on this indicator is under discussion, (data collection in 1-3 years).

Based on MOL Group’s FY 2023 Materiality assessment Human Rights is a material topic, however MOL Group does not identify ‚Rights of Indigenous peoples’ a material subtopic of Human Rights. For more information, please see GRI indicator 3-3.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.17 RIGHTS OF INDIGENOUS PEOPLES**

**11.17.2 Disclosure 411-1 Incidents of violations involving rights of indigenous peoples**

REPORTING **OMITTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A /  EM-EP-210a.3  

MOL Group Code of Ethics and Business Conduct provides for the protection of indigenous people 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.”)

MOL Group Code of Ethics and Business Conduct:  
[https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

MOL Group does not operate in countries where the rights of indigenous people would be at risk. Therefore, MOL Group does not have incidents of violations involving rights of indigenous people. Further disclosure on this indicator is under discussion, (data collection in 1-3 years).

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.17** **RIGHTS OF INDIGENOUS PEOPLES**

**11.17.3** **Additional sector disclosures**

REPORTING **OMITTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A



**1 3 5 11 16**



MOL Group Code of Ethics and Business Conduct provides for the protection of indigenous people 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.”)

MOL Group Code of Ethics and Business Conduct:  
[https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

REASON FOR OMISSION:

MOL Group does not operate in locations where indigenous people are present or affected by the company’s activity. Therefore – besides MOL Group’s commitment in the Code of Ethics to respect indigenous people’s rights as presented below – MOL Group does not have data regarding this GRI standard. Further disclosure on this indicator is under discussion, (data collection in 1-3 years).

Based on MOL Group’s FY 2023 Materiality assessment Human Rights is a material topic, however MOL Group does not identify ,Rights of Indigenous peoples’ a material subtopic of Human Rights. For more information, please see GRI indicator 3-3.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.17** **RIGHTS OF INDIGENOUS PEOPLES**

**11.17.4** **Additional sector disclosures**

REPORTING **OMITTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A



MOL Group Code of Ethics and Business Conduct provides for the protection of indigenous people 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.”)

MOL Group Code of Ethics and Business Conduct:  
[https://molgroup.info/storage/documents/sustainability/mol\\_group\\_code\\_of\\_ethics.pdf](https://molgroup.info/storage/documents/sustainability/mol_group_code_of_ethics.pdf)

REASON FOR OMISSION:  
MOL Group does not operate in countries where indigenous people are present and their rights would be at risk, therefore – besides MOL Group’s commitment in the Code of Ethics to respect indigenous people's rights presented below – MOL Group does not have agreements with indigenous people. Further disclosure on this indicator is under discussion, (data collection in 1-3 years).

Based on MOL Group’s FY 2023 Materiality assessment Human Rights is a material topic, however MOL Group does not identify ‚Rights of Indigenous peoples’ a material subtopic of Human Rights. For more information, please see GRI indicator 3-3.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.18** **CONFLICT AND SECURITY**

**11.18.1** **Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /  EM-EP-210a.3  **16** 

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 providers shall also respect the Codes and they are trained in human rights policies or procedures. Trainings take 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](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](https://molgroup.info/storage/documents/sustainability/business_partner_code_of_ethics/business_partner_code_of_ethics_2017_english.pdf)

An organization’s activities may trigger conflict or, in cases of existing conflict, intensify it. The use of security personnel to manage conflict can play an essential role in allowing an organization to operate safely and productively but also has the potential to impact on people’s human rights. This topic covers the organization’s security practices and its approach to operating in areas of conflict.

- List of the locations operations in areas of conflict:
- Pakistan (1 subsidiary with several employees, operation: E&P activities)
  - Russia (subsidiaries with several employees, operation: E&P activities)
  - Ukraine (1 subsidiary with few employees, operation: sales of lubricants)
  - Kazakhstan (1 subsidiary with few employees, operation: E&P activities)
  - Syria (1 subsidiary with few employees, operation: exploration activities)

More information on the topic can be found in the Annual Report under "Site and Cyber Security" section.

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.18** **CONFLICT AND SECURITY**

**11.18.2** **Disclosure 410-1 Security personnel trained in human rights policies or procedures**

REPORTING **OMITTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 410

For further details please see disclosure 410-1

REASON FOR OMISSION:

GRI standard required data not available at the moment for this indicator however, disclosure on the missing information is under discussion, (data collection in 1-3 years).

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.19** **ANTI-COMPETITIVE BEHAVIOUR**

**11.19.1** **Disclosure 3-3 Management of material topics**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 3-1 AND GRI 3-2 FOR INFORMATION REGARDING HOW MOL GROUP MANAGES THIS MATERIAL TOPIC, PLEASE SEE GRI INDICATOR 3-3

Information regarding the potential negative and positive impacts of each material topic can be obtained from this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.19** **ANTI-COMPETITIVE BEHAVIOUR**

**11.19.2** **Disclosure 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



TO BE READ AND UNDERSTOOD WITH GRI 206

For further details please visit disclosure 206-1

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 **INTEGRITY&TRANSPARENCY**



**10.20 ANTI-CORRUPTION**

**11.20.1 Disclosure 3-3 Management of material topics**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	YES	ANNUAL REPORT PAGE	N/A	/	EM-EP-510a.2	12	16	
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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.
- For more information, please see the following link: <https://molgroup.info/en/sustainability/ethics-and-governance>

• For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**10.20** **ANTI-CORRUPTION**

**11.20.2** **Disclosure 205-1 Operations assessed for risks related to corruption**

REPORTING **PARTIALLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



**12** **16**



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205

For further details please see disclosure 205-1

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**10.20** **ANTI-CORRUPTION**

**11.20.3** **Disclosure 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



12

16



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205

For further details please see disclosure 205-2

REASONS FOR OMISSION:

GRI standard required data not available at the moment, disclosure is under consideration, (data collection in 1-3 years).

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**10.20** **ANTI-CORRUPTION**

**11.20.4** **Disclosure 205-3 Confirmed incidents of corruption and actions taken**

REPORTING **FULLY REPORTED** EXTERNAL ASSURANCE **YES** ANNUAL REPORT PAGE **N/A** /   **12**  **16** 

TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 205

For further details please see disclosure 205-3

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Topics of ethics complaints (whistle-blower reports) - Total
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.20** **ANTI-CORRUPTION**

**11.20.5** **Additional sector disclosures**

REPORTING **OMITTED**

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A



REASON FOR OMISSION:

Due to business confidentiality, our 3rd party contracts are not publicly available. The contract is available at both party with complete transparency, but the confidentiality obligation applies to all 3rd party contracts. Disclosure of this indicator is under discussion, (data collection in 1-3 years).

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.20** **ANTI-CORRUPTION**

**11.20.6** **Additional sector disclosures**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE **YES**

ANNUAL REPORT PAGE **N/A**



List of the organization's beneficial owners can be found in the Annual Report under the Financial Consolidated Statements through the following link:

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

Identifying the beneficial owners of business partners is managed under sanction clearing task. The Contracting Unit shall check whether the relevant business partner is subject to international sanctions (EU, US, UK and UN). For that purpose, the *Partner Datasheet* needs to be filled out and signed by the business partner to obtain information necessary to perform the sanctions clearance. The following information has to be given regarding ownership:

- Ownership:
- Name and registered seat of controlling shareholder(s)
  - Name and registered seat of minor shareholder(s)
  - Name and address of ultimate beneficial owner(s)

The information shall be crosschecked by the Contracting Unit with the relevant sanctions reference lists. In case of any match with the sanctions lists or if the transaction involves a country affected by sanctions, Legal team has to be notified about sanctions exposure.

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

LINK **N/A** EXCEL SHEET **N/A**



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.1** **Disclosure 3-3 Management of material topics**

REPORTING	FULLY REPORTED	EXTERNAL ASSURANCE	N/A	ANNUAL REPORT PAGE	N/A	/			
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TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 3-1 AND GRI 3-2 For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

Information regarding the potential negative and positive impacts of each material topic can be obtained in the 2023YE Materiality Assessment Report and this year's Integrated Annual Report.

MOL Group puts great emphasis on addressing its negative impacts through its activities or as a result of its business relationships which has been set out in greater detail in the Annual Report under the "Integrated Corporate Risk Management" section.

For information regarding how MOL Group manages (3-3) material topics, please see GRI indicator 3-3 and please see the following link: <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 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.2** **Disclosure 201-1 Direct economic value generated and distributed**

REPORTING **FULLY REPORTED**

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201

For further details please see disclosure 201-1

SUPPORTING DATA **YES** NAME OF INDICATOR Economic

LINK [DATA LIBRARY](#) EXCEL SHEET INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.3** **Disclosure 201-4 Financial assistance received from government**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 201

For further details please see disclosure 201-4

SUPPORTING DATA	<b>YES</b>	NAME OF INDICATOR	Financial assistance received from government
LINK	<a href="#">DATA LIBRARY</a>	EXCEL SHEET	INTEGRITY&TRANSPARENCY



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.4** **Disclosure 207-1 Approach to tax**

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



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 207

For further information please see disclosure 207-1

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.5** **Disclosure 207-2 Tax governance, control, and risk management**

REPORTING: PARTIALLY REPORTED | EXTERNAL ASSURANCE: N/A | ANNUAL REPORT PAGE: N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 207

For further information please see disclosure 207-2

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.6** **Disclosure 207-3 Stakeholder engagement and management of concerns related to tax**

REPORTING **PARTIALLY REPORTED** EXTERNAL ASSURANCE N/A ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD IN CONJUNCTION WITH GRI 207

For further information please see disclosure 207-3

SUPPORTING DATA	N/A	NAME OF INDICATOR	N/A
LINK	N/A	EXCEL SHEET	N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** **PAYMENTS TO GOVERNMENTS**

**11.21.7** **Additional sector disclosures**

REPORTING **OMITTED**

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A



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, however further disclosure on this indicator is under discussion disclosure is expected in the next 1-years.

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A





**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.21** PAYMENTS TO GOVERNMENTS

**11.21.8** Additional sector disclosures

REPORTING **OMITTED**

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A



REASON FOR OMISSION:

MOL Group Upstream does not disclose detailed information related to this disclosure requirement due to the confidential nature of commercial topics, however further disclosure on this indicator is under discussion, (data collection in 1-3 years).

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.22** PUBLIC POLICY

**11.22.1** Disclosure 3-3 Management of material topics

REPORTING FULLY REPORTED

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A

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

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MOL Group's strategy and sustainability department and its regulatory & public affairs department both belong to the Group Strategic Operations and Corporate Development organization, which enables direct lines to make sure that MOL Group's strategy and stated policies are reflected during participation in public policy development and lobbying activities. All relevant business departments are consulted to make sure that engagement is in line with MOL Group's strategic directions.

Beyond activities on the issue of climate change (described in section 11.2.4), MOL Group also participates in public policy development in other areas including secondary raw materials, waste management, industrial emissions, occupational and chemical safety, sustainable finance. The stance of public policy development and lobbying activities in these areas is supportive of the Green Deal objectives beyond climate neutrality, including the zero-pollution ambition and circular economy. MOL Group's objective is to advocate for policies that can ensure the transition to a low-carbon circular economy in the Central and Eastern European region. Considering EU targets in these areas and the CEE region's progress towards those targets, new technologies, new policy approaches and large investments are needed in the region.

The EU-level industry associations mentioned in section 11.2.4. (FuelsEurope, Cefic, IOGP) also participate in policy development on the above issues, apart from climate change. All of these associations have published policy-related positions supporting the zero-pollution ambition and circular economy and have outlined visions and transition pathways for the respective industries to meet these challenges. MOL Group takes part in the working groups of these associations to develop the industry position, to ensure they are in line with the company's and the region's industrial transition and circularity objectives.

For information regarding how MOL Group manages this material topic, please see GRI indicator 3-3

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A



**GRI 2**  
GENERAL DISCLOSURES



**GRI 3**  
MATERIAL TOPICS



**GRI 200**  
ECONOMIC



**GRI 300**  
ENVIRONMENTAL



**GRI 400**  
SOCIAL



**GRI 11**  
OIL&GAS

**11.22** PUBLIC POLICY

**11.22.2** Disclosure 415-1 Political contributions

REPORTING FULLY REPORTED

EXTERNAL ASSURANCE N/A

ANNUAL REPORT PAGE N/A



TO BE READ AND UNDERSTOOD WITH GRI 415

For further information please see disclosure 415-1

SUPPORTING DATA N/A NAME OF INDICATOR N/A

LINK N/A EXCEL SHEET N/A

# 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.

## **CONTACT DETAILS**

### **INVESTOR RELATIONS**

[investorrelations@mol.hu](mailto:investorrelations@mol.hu)