



GREEN FINANCE FRAMEWORK

DECEMBER 2025

► MOLGROUP

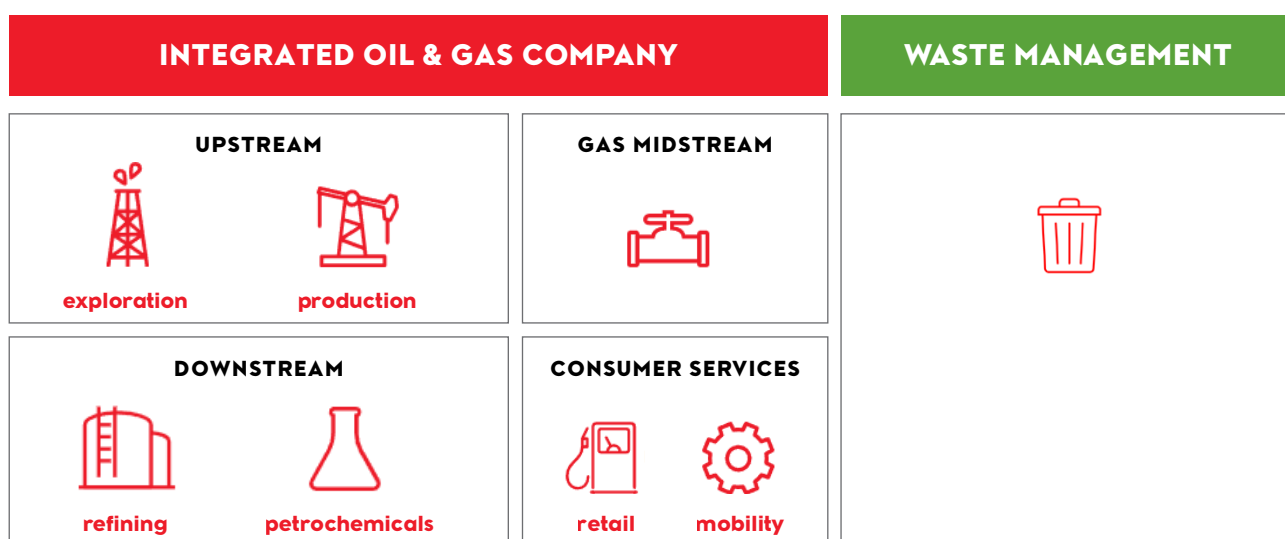
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MOL GROUP IN BRIEF

MOL Group is a leading integrated Central Eastern European oil and gas corporation supported by 80 years' experience in the hydrocarbon field. Since its establishment in 1957 as the Hungarian Oil and Gas Trust, the company has grown into an international energy enterprise present across over 30 countries worldwide.

Headquartered in Budapest, Hungary, MOL Group today employs 25,000 people united by a shared heritage of technical excellence. As a fully integrated oil and gas company, MOL Group participates across the entire value chain including upstream exploration and production, midstream transportation, downstream refining, and petrochemicals, as well as retail distribution.



UPSTREAM

Within its upstream operations, MOL Group undertakes onshore and offshore oil and gas exploration and production (E&P) across nine countries in Europe, the Middle East, Africa, and Asia. The company's current production amounts to around 90,000 barrels per day of oil equivalent.

DOWNSTREAM

On the downstream side, MOL Group is involved in different business activities that are part of an integrated value chain, which turns crude oil into a range of refined products, ultimately moved and marketed for household, industrial and transport use. The products include, among others, gasoline, diesel, heating oil,

aviation fuel, lubricants, bitumen, sulphur and liquefied petroleum gas (LPG). In addition, the company produces and sells petrochemicals worldwide and holds a leading position in the petrochemical sector in the Central Eastern Europe region.

GAS MIDSTREAM

FGSZ Földgázszállító Zrt. (FGSZ) is the sole transmission system operator (TSO) of Hungary and a 100% subsidiary of MOL Group. It owns and operates the nearly 6,000 km long high-pressure natural gas transmission pipeline system covering the territory of Hungary, supplying gas distribution companies, power plants and a number of large industrial consumers.

Main activities are the construction, operation, and allocation of natural gas transmission capacity, of which it offers yearly, quarterly, monthly, daily, and within day firm and interruptible capacities through auctions. Main responsibilities include the odorization and continuous quality control of natural gas delivered to partners for safety purposes, the maintenance of the hydraulic balance of the transmission system, as well as the measurement of quantitative and qualitative characteristics of natural gas in a transparent manner, in compliance with the most stringent international standards.

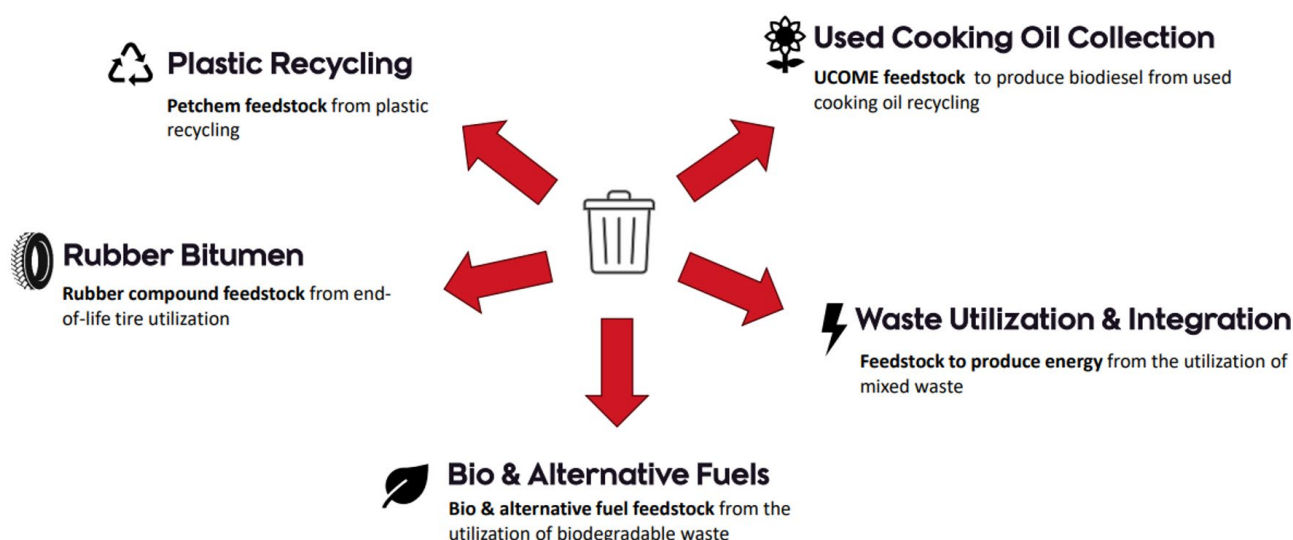
CONSUMER SERVICES

The business unit consists of three main pillars: retail, mobility solutions and digital factory. On fuel retailing MOL Group owns an extensive network of service stations across different brands in CEE. Beyond traditional retail, the company has started also to embrace rapid changes in transportation by tapping into growing areas of consumer demand, to become one of the primary sources of mobility solutions and innovations in the region, and to branch out from commodity seller to service provider. EV-chargers, fleet, bike and car-sharing services are the areas

to be expanded to become a fully integrated mobility provider. Digital Factory is leading the digital transformation of the consumer services business units by digitalizing customer interactions and internal operations. Through the personalization of customer interactions, the enhancement of convenience and the datafication of our internal operations, the factory supports the vision of MOL Group's retail business to become a true consumer goods retailer in the CEE region. At the core of our activities is the implementation of three digital platforms across ten markets: digital data & AI; digital CRM & loyalty and digital payments.

WASTE MANAGEMENT

Further, recently MOL Group entered into the new and exciting world of waste management, after being awarded for a long-term concession for Hungary's waste management services. MOL Group is now responsible for the collection of nearly 5 million tonnes of annual solid waste from households and businesses in Hungary, and for organizing the pre-treatment and treatment operations. Waste management business is meant to become an enabler of future growth by providing feedstock for energy industry:



Building on its heritage of innovation and regional leadership, MOL Group aims to evolve its portfolio towards low-carbon and circular economy solutions for Central and Eastern Europe: a highly efficient company, providing sustainable materials for the economy, low carbon fuels for mobility and convenient products and services for the people on the move, while also minimizing the environmental footprint of its own operations, making the region more sustainable and more self-sufficient.

MOL GROUP SUSTAINABILITY STRATEGY

MOL Group was one of the first players in the industry to come to terms with the changing environment and communicate its plan on the best path forward to the public. The 2030 strategy published in 2016 focused on a balanced transition towards meeting the demands of a low-carbon economy while at

the same time addressed how the traditional fossil-based economy can adapt and what role MOL Group can play in this change. This direction was reaffirmed already twice, first in 2021 and latest in March 2024 in the “Shape Tomorrow” strategy.

“SHAPE TOMORROW” STRATEGY

The Shape Tomorrow strategy was launched in 2021 and updated in 2024 to respond to the evolving energy and fuel demand market trends, the importance of secure energy supply, and the EU’s more ambitious decarbonization targets, prompting the revision of sustainability goals to accelerate the transition.

Key focus areas of 2021 of the “Shape Tomorrow 2030+” strategy remain but with an extra emphasis on supply security and green transformation.

INVEST INTO TRANSFORMATION



PETCHEM

Focus of further development shifted from large-scale projects to medium size investments until 2030



SUSTAINABLE DS ACTIVITIES

Emphasis on sought-after “green” alternatives with biogas, hydrogen and recycling opportunities



RENEWABLE ENERGY GENERATION

Increased focus due to strengthened decarbonization goals and compliance requirements



WASTE MANAGEMENT

Providing additional raw materials to the economy while achieving EU-level regulatory requirements

MAINTAINING SECURITY OF SUPPLY



E&P

Maintain a healthy, diversified portfolio with low break-even & super cash generation capability while leveraging subsurface expertise in geothermal, lithium & CCS



FUELS

Focus on building up further logistic capabilities for crude diversification and to exploit fuel market potential



RETAIL

Keep both the fuel and the non-fuel business on the growth path leveraging on the combination of strong credentials and stable market outlook



MOBILITY

Delayed ramp-up of alternative fuel in the CEE shift the full scale-up of EV-charging segment

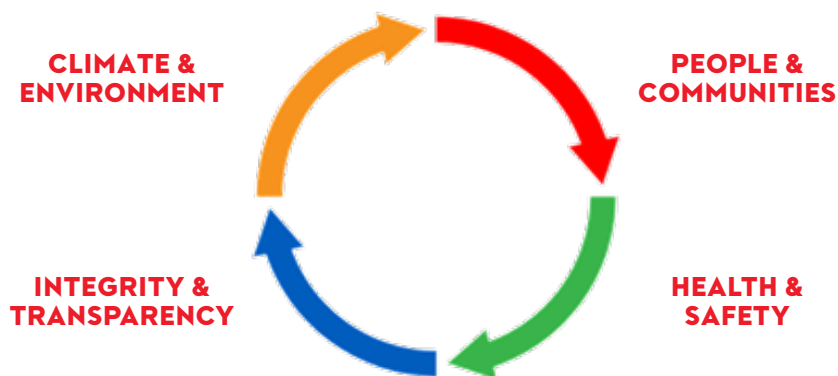
SUSTAINABILITY STRATEGY

MOL Group’s sustainability strategy is fully embodied in the Shape Tomorrow strategy last updated in 2024, and annually informed since 2020 by materiality assessments. In 2024, MOL Group introduced a new Double Materiality Assessment methodology to comply with CSRD requirements, where the focus of the approach shifted from assessing the importance of sustainability-related issues for MOL Group and

its external stakeholders to identify the material impacts on people and the environment (“inside-out”) and the financial risks and opportunities arising from sustainability matters that may affect the company (“outside-in” perspective). MOL Group’s Materiality Matrix represents the outcome of the assessment and provides the sustainability matters from the topical perspective.



The material impacts and financial risks and opportunities identified are convened in four sustainability focus areas:



CLIMATE & ENVIRONMENT

Understanding the environment in which MOL Group operates and minimizing the environmental footprint are critical to maintain the corporate's legal, social and commercial license to operate. MOL Group is continuously working on eliminating, minimizing, and mitigating the negative environmental impacts in all areas of its operation. MOL Group aims to improve its waste management and emission performance, manage the impacts on water and biodiversity and address any related impacts on local communities.

Targets and actions have been defined in all sustainability focus areas to ensure MOL Group's sustainable development in collaboration with its partners and stakeholders in the supply chain.

CLIMATE TRANSITION PLAN

MOL Group considers climate change caused by the emission of greenhouse gases to be one of mankind's major economic-social-environmental problems; an issue of utmost importance for sustainable development. MOL Group is committed to minimize its environmental footprint and aims to decrease the greenhouse gas emissions throughout the entire value chain of its operations.

Expanding on MOL Group's Shape Tomorrow strategy, the company has published its transition plan for climate change mitigation in the 2024 Sustainability Statement. The transition plan, approved by the Sustainable Development Committee of the Board of Directors, details the roadmap for net zero until 2050 and provides insight to the identified decarbonization levers to achieve the following targets¹:

- 25% reduction in Absolute Scope 1 & 2² GHG emissions by 2030 (2019 baseline)³
- 5% reduction in Absolute Scope 3 – category 11 “use of sold products” - GHG emissions by 2030 (2022 baseline)
- Net-zero by 2050 (all Scopes)
- 30-40% of total CAPEX allocated to low carbon and sustainable business projects between 2025 and 2030

¹ The targets take into account MOL Group's best estimates with regards to macroeconomic scenarios, the speed of the energy transition in the Central and Eastern European region, established regulatory frameworks and the Group's expected strategic shifts in the business scope. Premises are developed through partial equilibrium models where external assumptions are regularly used, including IEA World Energy Outlook scenario results. However, climate modelling is not the scope of these exercises.

² Scope 2 location-based

³ GHGs covered in target: carbon dioxide (CO₂) and methane (CH₄)

MOL Group identified the key decarbonization levers and their expected contribution to the aforementioned Scope 1 and 2 target:

1. ENERGY EFFICIENCY:

Optimizing processes and equipment to reduce energy consumption and emissions. This includes upgrading to more efficient machinery, improving insulation, and implementing advanced process controls. By reducing energy waste, companies can lower their carbon footprint and operational costs. Energy efficiency technologies are well established and widely implemented across various industries, including the oil and gas sector. For this reason, energy efficiency initiatives are key from the earliest stages of decarbonization.

Energy efficiency is expected to contribute 800 kt of Scope 1 and 2 emissions reduction between 2025-2030.

2. ELECTRIFICATION AND RENEWABLE ENERGY:

Replacing fossil-fuel based energy sources with electricity. This transition can significantly reduce GHG emissions, especially when combined with renewable energy integration. The maturity of electrification and renewable energy technologies varies. Solar and wind power are highly mature and cost competitive with traditional energy sources in the CEE region. While rapidly advancing technology, integrating renewable energy at industrial production sites also poses several challenges. The variability and intermittency of renewable energy sources can lead to reliability issues; conventional power management systems require significant upgrades or the adoption of advanced solutions such as energy storage installation; more specifically for oil and gas operations, full balance of steam systems also has to be considered.

MOL Group has already implemented actions which support the electrification of its production sites. Electrification and

renewable energy is expected to contribute a further 100-200 kt of Scope 1 and 2 emissions reduction between 2025-2030.

3. SUSTAINABLE FEEDSTOCKS AND PRODUCTS:

This lever includes using sustainable feedstocks such as green hydrogen, biogas, biomethane, biofuels, waste-based feedstock, and recycled plastics. These alternatives can replace conventional fossil-based feedstocks, reducing the carbon intensity of products and processes. The above-mentioned products are not only feedstocks for MOL Group's own operations but also direct the company towards a more sustainable product portfolio.

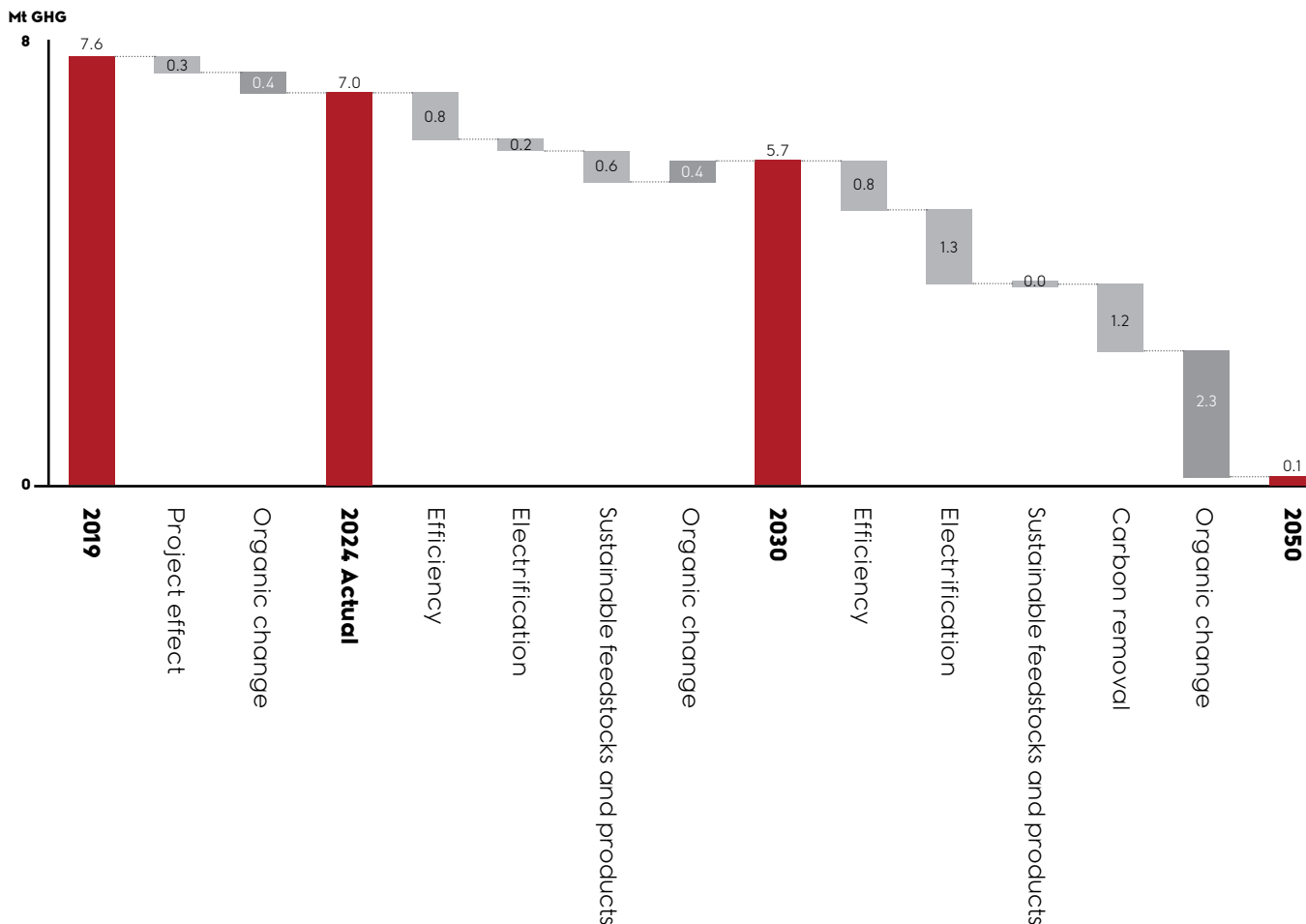
The maturity of sustainable feedstocks and products varies. For example, first generation biofuels and biogas are relatively mature and commercially viable, while technologies like green hydrogen or advanced biofuels are still developing but show significant potential. MOL Group has already implemented projects in all of these directions.

4. CARBON CAPTURE SOLUTIONS:

Technologies include carbon capture, utilization, and storage (CCUS), direct air capture (DAC) and solutions related to land use change. Verified negative emissions are an acknowledged part of climate scenarios and will be necessary to tackle residual emissions in hard to abate sectors such as oil and gas.

Carbon removal technologies are in various stages of development. CCUS is relatively mature and has been implemented in several large scale projects around the world, while DAC is still in the early stages but is rapidly advancing. MOL Group plans to use and gradually scale up carbon removal solutions after 2030 to reach its net zero target.

Beside the described decarbonization levers, MOL Group acknowledges that future organic growth (investments in new assets), but also the decline of traditional fossil fuel sales due to demand changes (presented as organic decline in the chart) will affect MOL Group's emission pathway. The planned actions and the expected demand changes are also taken into account in the transition plan.



MOL Group's forecasts are prepared for three scenarios: Slow Transition, Steady Transition & Net Zero Emission. The green energy transition is happening in all three scenarios, the biggest difference between them is the pace of the transition. The Shape Tomorrow Strategy and the transition plan is predominantly based on the Steady Transition scenario. If one of the other two scenarios materializes, it would mostly affect the timing of the investments and actions envisaged in the Shape Tomorrow Strategy and the transition plan, not the strategic directions themselves.

For the above reasons, MOL Group's 2030 targets are below the SBTi's cross-sector pathway, which suggests that gross Scope 1, 2 and 3 emissions should be reduced by 42% by 2030 and 90% by 2050 from 2020 levels⁴. Based on MOL Group's activities, MOL Group is excluded from the EU Paris-aligned Benchmarks⁵.

Overall, the described transformation requires significant funding. MOL Group has published its financial framework for the 2025-2030 period in the Shape Tomorrow Strategy, which presents a viable path towards the full execution of MOL Group's organic investment plan, even at conservative macro assumptions. More favourable macroeconomic conditions would leave financial headroom for special dividends and acquisitions as well.

⁴ SBTi: Pathways to Net Zero

⁵ Article 12(1) of Commission Delegated Regulation (EU) 2020/1818

ENVIRONMENT

In addition to climate change, MOL Group's holistic approach to sustainability means considering other aspects like waste and water management, air emissions and biodiversity. For this reason, MOL Group is committed to:

- New waste utilization & integration and water reservation strategy implementation (incl. biodiversity by 2025)
- Maintaining SO_x emissions at baseline levels by 2040 (baseline: average of 2021-2022)
- Maintaining NO_x emissions at baseline levels by 2040 (baseline: average of 2021-2022)
- Achieve a 10% reduction in freshwater withdrawal by 2040 compared to the average withdrawal recorded in 2021 and 2022
- 100+ ktpa polymer recycling by 2030
- zero routine flaring by 2030

MOL Group intends to leverage on the key following areas for addressing air emissions impact:

- low NO_x burners installation
- fixed roofs on floating roof tanks installation
- first and second stage vapour recovery units installation
- LDAR programmes implementation for VOC leakages, including programme for improving emissions monitoring and reporting

MOL Group intends to leverage on the following key areas in waste management:

- capacity scale-up: waste-to-chemicals integration
- waste feedstock: integration of Hungarian municipal solid waste into recycling operations but also biomass, plastic waste, etc.
- product development: customized solutions addressing customers' new challenges, e.g. the Packaging and Packaging Waste Directive
- recyclable materials extensive usage (e.g. coffee cups) at Service Stations
- efficiency improvement of the existing system (fragmented operations in ring-fenced regions)

- waste landfill minimization whilst increasing recycling and waste-to-energy
- deposit refund system (DRS) operation system
- cooperation with Hungarian retailers
- reverse vending machines (RVMs) purchase and installation
- 10 waste yards, 3 transfer stations and 3 waste sorting plants to be developed
- 100,000+ separate collection containers purchase and installation

MOL Group intends to leverage on the following key areas in water management:

- water-saving measures for downstream
- ground water periodical analysis of the quality through wells monitoring
- on-going implementation of the Water Conservation Action Plan (2014)
- use of treated effluent water for gardening purposes
- underground remediation measures (pumps and skimmers)
- groundwater hydraulic protection system

MOL Group intends to leverage on the following key areas in biodiversity:

- remediation measures (e.g. bioremediation) for contaminated soil
- trees plantation
- nests installation and bird population monitoring

Steering the portfolio towards low-carbon and circular economy products and services reflects the increasing awareness of MOL Group as a key player towards a low-carbon and climate resilient economy. MOL Group has already started low-carbon circular projects to enter into waste management, biogas production, green hydrogen, solar and other means of energy production. Continued expansion brings efficiency, self-reliance, and compliance with EU sustainability-related information.

PEOPLE & COMMUNITIES

MOL Group aims to conduct its business operations in a socially responsible manner which also complies with industry best practices. A fundamental part of MOL Group's corporate value set is the support for national, cultural, religious diversity, gender equality and diverse communities. To fulfil these commitments and social responsibilities MOL Group has increased the support to the local communities in the geographical scope of its operations.

PEOPLE

MOL Group considers human capital a key driver for innovation and essential for its complex transformational journey. MOL Group supports fair treatment practices such as guaranteeing diversity, ensuring fair and equal remuneration and supporting freedom of association. MOL Group partners with trade unions and work councils that are active across the organization and engage the majority of MOL Group's employees. MOL Group is committed to:

- Women in management: reach 30% target by 2030
- Sustainable employee engagement level at min. 75%

To achieve those targets, MOL Group intends to leverage on the following key areas:

- attraction and development programs
- training and development activities
- Diversity & Inclusion (D&I) framework actions
- employee engagement surveys and segment level action planning
- fair treatment practices
- wellbeing strategies

COMMUNITIES

MOL Group is a major market player and employer with a sizeable operational footprint, working under special attention from stakeholders, especially from community interests in areas where MOL Group conducts its operations.

Members of the public or representatives of different impacted groups expect to be informed of, consulted on and involved in MOL Group's decision-making. A lack of consultation or limited engagement can lead to adverse impacts on people and contribute to disruption to project planning or operations, delays, rising costs, legal challenges and the potential escalation of local issues to the national stage. Community engagement plays a crucial role for MOL Group, particularly in Downstream Production sites across the CEE and in Upstream operations in Pakistan.

MOL group is committed to:

- 50% social investment on local communities
- Practices for handling grievance mechanism and training implementation at all major operations

To achieve those targets, MOL Group intends to leverage on the key following areas:

- site-level connections
- public hearings
- joint activities with stakeholders
- Social Investment (SI) programmes for major projects
- Green Belt Program
- Talent Support and Child Healing programs
- Community Relationship Officers
- social investment strategies

HEALTH & SAFETY

As a responsible employer, MOL Group always considers the health and safety of its employees a top priority. MOL Group believes that the safe delivery of projects and operation of facilities is critical for its success and have a goal of delivering its business objectives with zero injuries to its people. MOL Group continuously seeks to improve its safety performance, to create a safe workplace for its employees and its contracted personnel, thus avoiding accidents and occupational illnesses.

MOL Group is committed to act responsibly on the health, safety, environmental (HSE) areas and realize the social impact of its activities as part of its day-to-day operations and business conduct, including but not limited to improving asset integrity to prevent incidents of any type, whilst maintaining a high standard of emergency response and promoting a culture in which all MOL Group employees share these commitments:

- Zero fatality
- TRIR below 1.1 by 2030 for core oil & gas operations
- Significant API Tier 1 process safety events elimination

To achieve those targets, MOL Group intends to leverage on the following key areas:

- Awareness raising
- HSE profession enhancing
- Strategic partnerships

INTEGRITY & TRANSPARENCY

MOL Group owns its excellent reputation to the reliability of its employees, managers and business partners. Good reputation and brand equity account for a significant portion of the corporate's business value. Ethical business conduct contributes to the creation of a corporate environment and culture that shall ensure the prevention or mitigation of internal and external risks and conflicts, which would jeopardize the achievement of the strategic long-term business targets, including the special focus on sustainable development. In addition to the risk mitigation objectives, ethical, fair and transparent operation also has a tremendous positive impact on society, environment and economy as well as the future growth potential. Uncompromised integrity and good reputation support the development and maintenance of business relationships that create value, boost consumer and shareholder confidence, attract and retain talent, increase goodwill, brand trust and profitability.

ETHICS & GOVERNANCE

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, and targets and requires:

- Annual ethics training for 100% of employees

MOL Group implemented an ethics management system which includes a Code of Ethics and Business Conduct (CoEBC), Ethics Council, Ethics Officers, Ethics & Compliance "Speak-up!", ethics communication, training, monitoring, risk assessment and audit.

SUPPLY CHAIN

MOL Group Procurement aims to ensure transparency on group level, treat suppliers equally and fairly, practice integrity and prevent conflicts of interest. Furthermore, the organization ensures that the non-HC purchased products and services are in compliance with relevant policies, laws and regulations and establish sustainable supply chain by integrating sustainability in its procurement processes. MOL Group Responsible Procurement Policy represents commitments to support the sustainability principles to be shared with all suppliers of MOL Group. Therefore, all suppliers of MOL Group are requested to accept and sign this Policy.

SUPPORTING REGULATIONS, STANDARDS, OR FRAMEWORKS FOR SUSTAINABILITY-RELATED DISCLOSURE AND REPORTING

MOL Group aims to follow best market practices for sustainability-related disclosure and reporting:



Climate related disclosures in accordance with the recommendations of the TCFD



Non-financial (sustainability) reporting according to GRI Standards- Sustainability Reporting Guidelines, including the GRI sector supplement for “Oil & Gas sector standard” guidelines



Financially material sustainability information according to SASB standards including SASB metric codes from relevant sub-sectors based on SASB Materiality Map



Materiality assessment, content and selection of sustainability indicators in line with the Sustainability Reporting Guidance for the Oil and Gas Industry developed by IPIECA, IOGP and API



Calculation and reporting of GHG emissions Scope 1, 2 and 3 consistent with the Greenhouse Gas Protocol – operational control approach



Recurring participation in CDP Corporate Questionnaire on environmental, water, biodiversity and plastic issues – 2024 CDP Climate/Water Scores: C



Reporting under the European Sustainability Reporting Standards (ESRS), including EFRAG’s Materiality Assessment Implementation Guidance



Reporting based on Article 8 of the EU Taxonomy Regulation



Management systems certified according to ISO standards. See here for further information

SUSTAINABILITY GOVERNANCE

BOARD OF DIRECTORS

MOL Group's Board of Directors (BoD) is responsible for defining the main business objectives of the group as well as to review and approve the group's business strategy. MOL Group in 2024 updated its long-term strategy (Shape Tomorrow) that is now fully integrated with a sustainability strategy (which includes climate change-related actions), and the BoD is responsible for approving the group's business strategy. Furthermore, the BoD and its committees are tasked with monitoring and overseeing progress against goals and targets, including climate related ones. The BoD is informed and continually updated on climate related risks and challenges via regular reporting through various channels.

SUSTAINABLE DEVELOPMENT COMMITTEE (SDC)

MOL Group established the Sustainable Development Committee (SDC) of the BoD, and the SDC is responsible for sustainability related matters, including but not limited to climate change. This includes advising and guiding the group-level strategy's sustainability part, overseeing the progress of goals and target related to this area, approving the sustainability section of MOL Group's integrated annual reports (which include an extensive public disclosure) and monitoring the external environment. The SDC guides and approves MOL Group's double materiality assessment process and its outcome (materiality matrix) that includes

impacts, risks and opportunities, and which among others, covers climate change, water, and biodiversity.

FINANCE AND RISK COMMITTEE (FRC)

In addition to the BoD, the Finance and Risk Committee (FRC) has also been assigned climate-related responsibilities, directly dealing with specific climate change related matters. The FRC is tasked with monitoring, among other things, the financial and operational risks related to climate change as well as the methodology and management of risks, as well as operating the Enterprise Risk Management (ERM) system.

EXECUTIVE MANAGEMENT

Part of the roles and responsibilities of the executive management includes assessing and managing climate-related risks and challenges, as well as executing the approved strategy. In terms of organizational structure, responsibility for climate change does not reside in a single department or person. Responsibilities for climate change related matters are dispersed through a wide number of roles across the group. Several functions at group level analyze climate change related risks and challenges. Furthermore, all divisions monitor and assess climate-related risks and challenges as an integral part of their roles and responsibilities in executing and designing their strategies as well as in the ERM risk reviews.



INCENTIVES FOR THE MANAGEMENT OF ENVIRONMENTAL ISSUES

Top management (C-suite managers) remuneration mix consists of four key pillars: a) annual base salary; b) short-term incentives (STI); c) long-term incentives (LTI); and d) benefits. The STI framework includes a mix of financial and non-financial KPIs. Non-financial KPIs may comprehend sustainable development & health, safety and environment-related performance indicators, including Scope 1 and 2 GHG emissions and TRIR targets defined by the Corporate Governance and Remuneration Committee. Non-financial targets may also contain company or divisional level key projects, focusing on people and culture. For further information, refer to the publicly available [remuneration policy](#) and [integrated annual report](#).

MOL GROUP GREEN FINANCE FRAMEWORK

MOL GROUP RATIONALE FOR SUSTAINABLE FINANCING

MOL Group has established a Green Finance Framework (referred to as the “**Framework**”) to be able to issue green finance instruments to finance and/or refinance projects to better align the financing needs with the sustainability strategy. The establishment of this Framework supports accountability and commitments with regards to MOL Group’s environmental strategy, as it provides additional transparency around the financing and/or refinancing of projects which enable the transition to a low-carbon, circular and unpolluted economy.

MOL Group believes green finance instruments are an effective tool to channel projects that demonstrate environmental benefits and thereby contribute to the objectives of the EU Green Deal, the Paris Climate Agreement and the UN Sustainable Development Goals 2030 (UN SDGs). MOL Group is committed to promoting sustainable economic activities in the industry and regions where the company operates.

In addition, green finance instruments will help to diversify MOL Group’s investor base, to broaden dialogue with the existing investors and to contribute to the development of the green finance market.

BASIS OF THE MOL GROUP GREEN FINANCE FRAMEWORK

MOL Group has established this Framework under which it or any of its subsidiaries (referred to as “**MOL Group**”) can issue green finance instruments (referred to as “**Green Finance Instruments**”), which may include senior bonds (preferred and non-preferred), subordinated bonds, medium-term notes (MTNs), promissory notes (Schuldscheindarlehen), commercial papers, repurchase agreements and/or loans in any currency and/or denomination to finance and/or refinance green eligible projects (referred to as “**Eligible Green Projects**”) with a positive environmental impact.

The Framework is based on the:

- ICMA Green Bond Principles 2025⁶
- ICMA Pre-issuance Checklist for Green Bonds / Green Bond Programme 2023⁷
- LMA/APLMA/LSTA Green Loan Principles 2025⁸

which provide guidance in the form of four key components:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

The Framework also follows the recommendation of the Green Bond Principles with regards to external review.

⁶ See here: <https://www.icmagroup.org/assets/documents/Sustainable-finance/2025-updates/Green-Bond-Principles-GBP-June-2025.pdf>

⁷ See here: <https://www.icmagroup.org/assets/documents/Sustainable-finance/2023-updates/Pre-issuance-Check-List-for-Green-Bonds-Green-Bond-Programmes-June-2023-220623.pdf>

⁸ See here: https://www.lma.eu.com/application/files/1917/4298/0817/Green_Loan_Principles_-_26_March_2025.pdf

MOL Group may review and update this Framework, from time to time, to align with changing market practices, evolving regulations, technological innovations, and updates to external standards (i.e. future changes to the ICMA Green Bond Principles and the LMA/APLMA/LSTA Green Loan Principles). Any future version of this Framework will either keep or improve the current level of transparency and reporting disclosures, including the corresponding external review (referred to as “**Second Party Opinion**”) by an external

consultant (referred to as the “**Second Party Opinion Provider**”), and will be published on MOL Group’s website⁹.

This Framework will apply to any Green Finance Instruments issued by MOL Group. For the avoidance of doubt, any future version of this Framework (including the relevant eligibility criteria) and related Second Party Opinion may not necessarily apply to Green Finance Instruments issued under this version of the Framework.

USE OF PROCEEDS

An amount equivalent to the (net) proceeds from Green Finance Instruments issued by MOL Group will be used to finance and/or refinance Eligible Green Projects which comply with the eligibility criteria (referred to as “**Eligibility Criteria**”) set out below.

Eligible Green Projects include the current value of fixed assets (“**Assets**”), capital expenditures (“**CapEx**”)¹⁰ and/or operational expenditures (“**OpEx**”) or a combination thereof. Assets shall qualify for refinancing with no limitation with regards to look-back period, while CapEx and OpEx qualify with a maximum three-years look-back period.

In alignment with MOL Group’s broader sustainability strategy and support of the UN SDG 2030 agenda, the Eligibility Criteria contemplated under this Framework may directly contribute to the achievement of UN SDGs¹¹ and EU Environmental Objectives¹².

Eligibility Criteria for the Eligible Green Projects align with the applicable Substantial Contribution (“**SC**”) criteria of the EU Taxonomy Climate Delegated Act – Annex I and II, Environmental Delegated Act – Annex II and III and subsequent amendments.

MOL Group shall rely on the EU Taxonomy Art. 8 disclosures when selecting Eligible Green Projects, where applicable. The share of alignment of the Eligible Green Projects, if any, with the EU Taxonomy Regulation will be disclosed either before issuance and/or in the bond reporting.

Eligible Green Projects may be located in Hungary, Croatia, Slovakia, Czech Republic, Romania and/or Slovenia, but this may evolve overtime to other geographies where MOL is or may become active.








⁹ <https://molgroup.info/en/investor-relations/financing>

¹⁰ MOL group may refer to the definition of CapEx under point 1.1.2.2. of Annex I to the EU Taxonomy Disclosures Delegated Act <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32021R2178>

¹¹ Mapping between ICMA Eligible Categories and UN SDGs based on ICMA High Level Mapping to the Sustainable Development Goals: https://www.icmagroup.org/assets/documents/Sustainable-finance/2022-updates/Mapping-SDGs-to-GSS-Bonds_June-2022-280622.pdf

¹² Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending regulation (EU) 2019/2088

GREEN ELIGIBLE CATEGORIES

CATEGORY	ELIGIBILITY CRITERIA	CONTRIBUTION TO UN SDGS	CONTRIBUTION TO EU ENVIRONMENTAL OBJECTIVE	EU ECONOMIC ACTIVITY ¹³
Renewable Energy 	<p>Assets, CapEx and/or OpEx for the construction and/or operation of facilities producing electricity from:</p> <ul style="list-style-type: none"> • Solar power: solar photovoltaic (PV) facilities • Wind power: onshore facilities • Geothermal power: geothermal facilities with life-cycle GHG emissions lower than 100gCO₂e/kWh¹⁴ 	 	<p>Climate Change Mitigation (Article 10), including but not limited to:</p> <p>1.a) Generating, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, including through using innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid</p>	<p>4.1 – Electricity generation using solar photovoltaic technology (Annex I – Climate Delegated Act)</p> <p>4.3 – Electricity generation from wind power (Annex I – Climate Delegated Act)</p> <p>4.6 – Electricity generation from geothermal energy (Annex I – Climate Delegated Act)</p>
Green Infrastructure 	<p>Assets, CapEx and/or OpEx for the construction and/or operation of facilities producing electricity from:</p> <ul style="list-style-type: none"> • Transmission and/or distribution networks for renewable and low-carbon gases where the activity: <ul style="list-style-type: none"> • is either one of the following: <ul style="list-style-type: none"> • construction and/or operation of new T&D networks dedicated to hydrogen or other low-carbon gases • conversion/repurposing of existing natural gas networks to 100% hydrogen • retrofit of gas T&D networks that enables the integration of hydrogen and other low-carbon gases in the network, including any gas T&D network activity that enables the increase of the blend of hydrogen or other low carbon gasses in the gas system <ul style="list-style-type: none"> • includes leak detection and repair of existing gas pipelines and other network elements to reduce methane leakage • Electric heat pumps where the Global Warming Potential (GWP) of the refrigerant does not exceed 675 and energy efficiency requirements laid down in the implementing regulations¹⁵ under Directive 2009/125/EC are met • Facilities for waste heat recovery to produce heat/cool • Bioenergy-based combined heat, cooling and power (CCHP) systems where the greenhouse gas emission savings from the use of biomass in cogeneration installations are at least 80% in relation to the GHG emission saving methodology and fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001¹⁶ • Energy efficiency equipment in buildings: heating, ventilation and air-conditioning (HVAC) and water heating systems, including equipment related to districting heating services, with highly efficient technologies¹⁷ 	  	<p>Climate Change Mitigation (Article 10), including but not limited to:</p> <p>1.b) Improving energy efficiency, except for power generation activities as referred to in Article 19(3)</p> <p>1.g) Establishing energy infrastructure required for enabling the decarbonization of energy systems</p>	<p>4.14 – Transmission and distribution networks for renewables and low-carbon gases (Annex I – Climate Delegated Act)</p> <p>4.16 – Installation and operation of electric heat pumps (Annex I – Climate Delegated Act)</p> <p>4.20 – Cogeneration of heat/cool from bioenergy (Annex I – Climate Delegated Act)</p> <p>4.25 – Production of heat/cool using waste heat (Annex I – Climate Delegated Act)</p> <p>7.3 – Installation, maintenance and repair of energy efficiency equipment (Annex I – Climate Delegated Act)</p>




¹³ Supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives, see here: https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/taxonomy-regulation_en

¹⁴ Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.

¹⁵ Commission Regulation (EU) No 206/2012 of 6 March 2012 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for air conditioners and comfort fans (OJ L 72, 10.3.2012, p. 7), Commission Regulation (EU) No 813/2013 of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for space heaters and combination heaters (OJ L 239, 6.9.2013, p. 136) and Commission Regulation (EU) 2016/2281 Commission Regulation (EU) 2016/2281 of 30 November 2016 implementing Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for energy-related products, with regard to ecodesign requirements for air heating products, cooling products, high temperature process chillers and fan coil units (OJ L 346, 20.12.2016, p. 1).

¹⁶ Agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria down in Article 29, paragraphs 6 and 7 of that Directive. Where the cogeneration installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria set out in the economic activity 5.6 and criteria 1 and 1 of the economic activity 5.7, respectively, of the EU Taxonomy Climate Delegated Act – Annex I, as applicable. Points 1 and 2 do not apply to cogeneration installations with a total rated thermal input below 2 MW and using gaseous biomass fuels.

¹⁷ The equipment complies with minimum requirements set for individual components and systems in the applicable national measures implementing Directive 2010/31/EU and, where applicable, are rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation.

CATEGORY	ELIGIBILITY CRITERIA	CONTRIBUTION TO UN SDGS	CONTRIBUTION TO EU ENVIRONMENTAL OBJECTIVE	EU ECONOMIC ACTIVITY ¹³
Green Products   	<p>Assets, CapEx and/or OpEx for the manufacturing of:</p> <ul style="list-style-type: none"> • Hydrogen and/or hydrogen-based synthetic fuels where the life-cycle GHG emissions savings requirements are respectively of 73.4% and 70% relative to a fossil fuel comparator of 94gCO₂e/MJ¹⁸ • Organic basic chemicals where the GHG emissions¹⁹ are lower than: <ul style="list-style-type: none"> • for HCV: 0.693 tCO₂e/t of HCV • for aromatics: 0.0072 tCO₂e/t of complex weighted throughput • for vinyl chloride: 0.171 tCO₂e/t of vinyl chloride • for styrene: 0.419 tCO₂e/t of styrene • for ethylene oxide/ethylene glycol: 0.314 tCO₂e/t of ethylene oxide/glycol • for adipic acid: 0.32 tCO₂e/t of adipic acid <p>Where the organic chemicals in scope are produced wholly or partially from renewable feedstock, the life-cycle GHG emissions of the manufactured chemical, manufactured wholly or partially from renewable feedstock, are lower than the life-cycle GHG emissions of the equivalent chemical manufactured from fossil fuel feedstock.</p> <ul style="list-style-type: none"> • Plastics in primary form where either²¹: <ul style="list-style-type: none"> • the plastic in primary form is fully manufactured by mechanical recycling of plastic waste • where mechanical recycling is not technically feasible or economically viable, the plastic in primary form is fully manufactured by chemical recycling of plastic waste and the life-cycle GHG emissions of the manufactured plastic, excluding any calculated credits from the production of fuels, are lower than the life-cycle GHG emissions of the equivalent plastic in primary form manufactured from fossil fuel feedstock²² • derived wholly or partially from renewable feedstock²³ and its life-cycle GHG emissions are lower than the life-cycle GHG emissions of the equivalent plastics in primary form manufactured from fossil fuel feedstock • Biogas and biofuels for use in transport and/or of bioliquids where the greenhouse gas emission savings are at least 65% in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex V to Directive (EU) 2018/2001²⁴ • Exclusionary criteria: food and feed crops 	 	<p>Climate Change Mitigation (Article 10), including but not limited to:</p> <p>1.b) Improving energy efficiency, except for power generation activities as referred to in Article 19(3)</p> <p>1.d) Switching to the use of sustainably sourced renewable materials</p> <p>1.h) Producing clean and efficient fuels from renewable or carbon-neutral sources</p>	<p>3.10 – Manufacture of hydrogen (Annex I – Climate Delegated Act)</p> <p>3.14 – Manufacture of organic basic chemicals (Annex I – Climate Delegated Act)</p> <p>3.17 – Manufacture of plastics in primary form (Annex I – Climate Delegated Act)</p> <p>4.13 – Manufacture of biogas and biofuels for use in transport and of bioliquids (Annex I – Climate Delegated Act)</p> <p>4.20 – Cogeneration of heat/cool and power from bioenergy (Annex I – Climate Delegated Act)</p>

¹⁸ In analogy to the approach set out in Article 25(2) of and Annex V to Directive (EU) 2018/2001. Life-cycle GHG emissions savings are calculated using the methodology referred to in Article 28(5) of Directive (EU) 2018/2001 or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emission savings are verified in line with Article 30 of Directive (EU) 2018/2001 where applicable, or by an independent third party. Where the CO₂ that would otherwise be emitted from the manufacturing process is captured for the purpose of underground storage, the CO₂ is transported and stored underground, in accordance with the technical screening criteria set out in the economic activities 5.11 and 5.12, respectively, of the EU Taxonomy Climate Delegated Act – Annex I.

¹⁹ Calculated in accordance with Regulation (EU) 2019/331. Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.

²⁰ Agricultural biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of organic basic chemicals complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive.

²¹ Agricultural biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 2 to 5 of Directive (EU) 2018/2001. Forest biomass used for the manufacture of plastics in its primary form complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive.

²² Life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.

²³ Renewable feedstock refers to biomass, industrial bio-waste or municipal bio-waste.

²⁴ Agricultural biomass used for the manufacture of biogas or biofuels for use in transport and for the manufacture of bioliquids complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used for the manufacture of biogas or biofuels for use in transport and for the manufacture of bioliquids complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive. Where the manufacture of biogas relies on anaerobic digestion or organic material, the production of the digestate meets the criteria of economic activity 5.6 under the EU Taxonomy Climate Delegated Act – Annex I and the substantial contribution criteria 1 and 2 of economic activity 5.7 under the EU Taxonomy Climate Delegated Act – Annex I, as applicable. Where the CO₂ that would otherwise be emitted from the manufacturing process is captured for the purpose of underground storage, the CO₂ is transported and stored underground in accordance with the technical screening criteria set out in the economic activities 5.11 and 5.12 of the EU Taxonomy Climate Delegated Act – Annex I.

CATEGORY	ELIGIBILITY CRITERIA	CONTRIBUTION TO UN SDGS	CONTRIBUTION TO EU ENVIRONMENTAL OBJECTIVE	EU ECONOMIC ACTIVITY ¹³
Energy Efficiency 	Assets, CapEx and/or OpEx for: Close-to-market research, development and innovation as per the substantial contribution criteria to climate change mitigation of the EU Taxonomy Climate Delegated Act (Annex I) under 9.1		Climate Change Mitigation (Article 10), including but not limited to: 1.i) Enabling any of the activities listed in points (a) to (h) of paragraph 1 in accordance with Article 16	9.1 – Close to market research, development and innovation (Annex I – Climate Delegated Act)
Clean Transportation 	Assets, CapEx and/or OpEx for the purchase, financing, renting, leasing and/or operation of: <ul style="list-style-type: none"> · Bicycles: electric or regular bikes 	 	Climate Change Mitigation (Article 10), including but not limited to: 1.c) Increasing clean or climate-neutral mobility	6.4 – Operation of personal mobility devices, cycle logistics (Annex I – Climate Delegated Act)
Sustainable Water and Wastewater Management	Assets, CapEx and/or OpEx for the renewal, construction, extension and/or operation of: <ul style="list-style-type: none"> · Water collection, treatment and/or supply systems leading to improve energy efficiency in one of the following ways: by decreasing the net average energy consumption of the system by at least 20% compared to own baseline performance averaged for three years, including abstraction and treatment, measured in kWh per cubic meter produced water supply by closing the gap by at least 20% either between the current leakage level averaged over three years, calculated using the Infrastructure Leakage Index (ILI) rating method and an ILI of 1.5²⁵, or between the current leakage level averaged over three years, calculated using another appropriate method, and the threshold value established in accordance with Article 4 of Directive (EU) 2020/2184. The current leakage level averaged over three years is calculated across the extent of water supply (distribution) network where the works are carried out, i.e. for the renewed water supply (distribution) network at district metered area(s) (DMAs) or pressure managed area(s) (PMAs) · Centralized waste water systems where the net energy consumption of the waste water treatment plant²⁶ equals to or is lower than: <ul style="list-style-type: none"> · 35kWh per population equivalent (p.e.) per annum for treatment plant capacity below 10000 p.e. · 25kWh per population equivalent (p.e.) per annum for treatment plant capacity between 10000 and 100000 p.e. · 20kWh per population equivalent (p.e.) per annum for treatment plant capacity above 100000 p.e.. For the construction and extension of a waste water treatment plant or a waste water treatment plant with a collection system, which are substituting more GHG-intensive treatment systems (such as septic tanks, anaerobic lagoons), an assessment of the direct GHG emissions is performed. The results are disclosed to investors and clients on demand.		Climate Change Mitigation (Article 10), including but not limited to: 1.b) Improving energy efficiency, except for power generation activities as referred to in Article 19(3)	5.2 – Renewal of water collection, treatment and supply systems (Annex I – Climate Delegated Act) 5.3 – Construction, extension, operation of waste water collection and treatment (Annex I – Climate Delegated Act)

²⁵The Infrastructure Leakage Index (ILI) is calculated as current annual real losses (CARL)/unavoidable annual real losses (UARL): The current annual real losses (CARL) represent the amount of water that is actually lost from the distribution network (i.e. not delivered to final users). The unavoidable annual real losses (UARL) take into consideration that there will always be some leakage in a water distribution network. The UARL is calculated based on factors such as the length of the network, the number of service connections and the pressure at which the network is operating.

²⁶Net energy consumption of the operation of the waste water treatment plant may take into account measures decreasing energy consumption relating to source control (reduction of storm water or pollutant load inputs), and, as appropriate, energy generation within the system (such as hydraulic, solar, thermal and wind energy).

CATEGORY	ELIGIBILITY CRITERIA	CONTRIBUTION TO UN SDGS	CONTRIBUTION TO EU ENVIRONMENTAL OBJECTIVE	EU ECONOMIC ACTIVITY ¹³
<p>Circular Economy Adapted Products, Production Technologies and Processes</p>  	<p>Assets, CapEx and/or OpEx for the management, remediation, depollution and/or dismantling of:</p> <ul style="list-style-type: none"> • Non-hazardous waste, where the activity is at least one of the following: <ul style="list-style-type: none"> · collection and/or transport, including the construction, operation and/or upgrade of facilities involved in the collection and transport, as per the substantial contribution criteria to the transition to a circular economy of the EU Taxonomy Environmental Delegated Act (Annex II) under 2.3 · construction, operation and/or upgrade of facilities for the sorting and material recovery, either: <ul style="list-style-type: none"> · converting at least 50%, in terms of weight, of the processed separately collected non-hazardous waste into secondary raw materials that are suitable for the substitution of virgin materials in production processes; or · as per the substantial contribution criteria to the climate change mitigation of the EU Taxonomy Climate Delegated Act (Annex I) under 5.8 · as per the substantial contribution criteria to the transition to a circular economy of the EU Taxonomy Environmental Delegated Act (Annex II) under 2.5 · as per the substantial contribution criteria to the transition to a circular economy of the EU Taxonomy Environmental Delegated Act (Annex II) under 2.7 • Hazardous waste, where the activity is at least one of the following: <ul style="list-style-type: none"> · collection and transport and/or construction, operation and/or upgrade of facilities involved in the collection and transport, either: <ul style="list-style-type: none"> · as per the substantial contribution criteria to the transition to a circular economy of the EU Taxonomy Environmental Delegated Act (Annex II) under 2.3; or · construction, operation repurposing and/or upgrade of facilities for the treatment, either: <ul style="list-style-type: none"> · meeting the following criteria: <ul style="list-style-type: none"> · the activities consist of the material recovery of secondary raw materials (including chemical substances and critical raw materials) from source-segregated hazardous waste · the recovered materials are substituting primary raw materials, including critical raw materials, or chemicals in production processes²⁷ · the recovered materials comply with the applicable industry specifications, harmonized standards, or end-of-waste criteria, as well as relevant applicable Union and national legislation; or · as per the substantial contribution criteria to pollution prevention and control of the EU Taxonomy Environmental Delegated Act (Annex III) under 2.2 		<p>Climate Change Mitigation (Article 10), including but not limited to:</p> <p>1.b) Improving energy efficiency, except for power generation activities as referred to in Article 19(3)</p> <p>Transition to a Circular Economy (Article 13), including but not limited to:</p> <p>1.f) Increasing the use of secondary raw materials and their quality, including by high-quality recycling of waste</p> <p>1.h) Increasing preparing for the re-use and recycling of waste</p> <p>1.i) Increasing the development of the waste management infrastructure needed for prevention, for preparing for re-use and for recycling, while ensuring that the recovered materials are recycled as high-quality secondary raw material input in production, thereby avoiding downcycling</p> <p>Pollution Prevention and Control (Article 14), including but not limited to:</p> <p>1.a) Preventing or, where that is not practicable, reducing pollutant emissions into air, water or land, other than greenhouse gases</p> <p>1.b) Improving levels of air, water or soil quality in the areas in which the economic activity takes place whilst minimising any adverse impact on, human health and the environment or the risk thereof</p> <p>1.c) Preventing or minimising any adverse impact on human health and the environment of the production, use or disposal of chemicals</p>	<p>5.8 – Composting of bio-waste (Annex I – Climate Delegated Act)</p> <p>5.9 – Material recovery from non-hazardous waste (Annex I – Climate Delegated Act)</p> <p>2.3 – Collection and transport of non-hazardous and hazardous waste (Annex II – Environmental Delegated Act)</p> <p>2.4 – Treatment of hazardous waste (Annex II – Environmental Delegated Act)</p> <p>2.5 – Recovery of bio-waste by anaerobic digestion or composting (Annex II – Environmental Delegated Act)</p> <p>2.7 – Sorting and material recovery of non-hazardous waste (Annex II – Environmental Delegated Act)</p> <p>2.2 – Treatment of hazardous waste (Annex III – Environmental Delegated Act)</p>

The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States. <http://www.un.org/sustainabledevelopment>

²⁷ Production processes refer to any kind of economic activity that produces a material, product or asset; recovered materials refer to the output of the recovery process.

PROCESS FOR PROJECT EVALUATION AND SELECTION

MOL Group has established a decision-making process to determine the eligibility of the Eligible Green Projects, in accordance with the description of the Eligibility Criteria outlined in the Use of Proceeds section of this Framework. Eligible Green Projects will be selected by a dedicated

Green Finance Working Group (referred as to the “Working Group”) set up within MOL Group. The Working Group is formed by members of the following departments: Group Planning & Reporting, Group Strategy and Group Treasury.

The Working Group will meet at least on an annual basis.

The Working Group is responsible for:

- Reviewing the content of MOL Group’s Green Finance Framework and updating it to reflect changes about the use of proceeds, the selection of Eligible Green Projects, the management of proceeds or reporting, and more broadly any changes in corporate strategy, technology, market, or regulatory developments as well as MOL Group’s relevant policies and long-term targets for social and environmental sustainability;
- Initiating the update of external documents such as Second Party Opinion, and related documents from external consultants and accountants;
- Evaluating and selecting Eligible Green Projects in line with the Eligibility Criteria, and excluding projects that no longer comply with the Eligibility Criteria or have been disposed of and, in such case, when required, replacing them;
- Overseeing the allocation of proceeds from Green Finance Instruments to Eligible Green Projects;
- Overseeing, approving and publishing the allocation and impact reporting, including external assurance statements. MOL Group may rely on external consultants and their data sources, in addition to its own assessment;
- Monitoring internal processes to identify known material risks of negative social and/or environmental impacts associated with the Eligible Green Projects and appropriate mitigation measures, where possible;
- Liaising with relevant business finance segments and other stakeholders on the above.

ENVIRONMENTAL AND SOCIAL RISK ASSESSMENT FRAMEWORK

MOL Group integrates Environmental, Social, and Governance (ESG) considerations comprehensively into decision-making processes at the corporate level, ensuring sustainable investments and operational practices that align with both regulatory requirements and voluntary standards. The approach begins with adherence to relevant European Union regulations and directives, such as the Environmental Impact Assessment (EIA) Directive, the EU Methane Regulation, and the REACH Regulation. These frameworks establish mandatory environmental safeguards that MOL Group must

comply with, guiding the early identification and management of potential environmental risks linked to new projects and investments. Beyond regulatory compliance, MOL Group incorporates voluntary standards and certifications into the due diligence processes to strengthen ESG risk management. The company holds numerous ISO certificates for its facilities, which underscore the commitment to environmental stewardship, health and safety, and social responsibility. These certifications help shape internal policies and practices, fostering continuous improvement and aligning with global best practices. MOL Group’s publicly available Energy Policy and

Health, Safety, and Environmental (HSE) and Social Impact Policy further demonstrate the dedication to managing the broader social and environmental implications of its operations. During project evaluation and investment decision-making, MOL Group undertakes a rigorous HSE risk assessment process. Based on MOL Group's internal HSE Management System, systems are in place to identify, assess, manage, regularly review and document HSE-related hazards and risks associated with MOL Group activities to prevent or reduce the likelihood and/or consequences of incidents. Planned and unplanned changes to MOL Group activities are identified and properly managed from a risk perspective. The assessment and management

of process and HSE risks are an integral part of project design and construction, enabling sound HSE performance throughout the planning, construction and commissioning of facilities. As part of this process, Environmental and Social Impact Assessments (ESIA) are carried out in the required depth.

This integrated approach ensures that MOL Group's investments advance sustainability goals while safeguarding the resilience and well-being of communities and ecosystems.

MANAGEMENT OF PROCEEDS

The (net) proceeds from Green Finance Instruments will be managed, tracked, and monitored in appropriate manner by MOL Group Treasury.

MOL Group shall allocate proceeds to Eligible Green Projects, selected in accordance with the Eligibility Criteria and the Process for Project Evaluation and Selection presented above, within 36 months following the time of issuance of each Green Finance Instruments.

Pending full allocation, unallocated (net)

proceeds will be managed temporarily in accordance with MOL Group's treasury principles (in cash, deposits, or other money market instruments), for the repayment of other indebtedness and/or other capital management activities, at the company's own discretion. MOL Group commits not to invest temporarily unallocated (net) proceeds in economic activities dedicated to hard coal, lignite, oil fuels, tobacco and controversial weapons.

REPORTING

MOL Group will make and keep readily available reporting on the allocation and impact of proceeds from Green Finance Instruments to the Eligible Green Projects annually and at least until full allocation (or until maturity) of each Green Finance Instruments, or in case of material change at the company's discretion.

The reporting will be based at least on an aggregated category level and will be made publicly available on MOL Group's website²⁸. MOL Group intends to consider for its reporting the ICMA "Handbook – Harmonized Framework for Impact Reporting for Green Bonds (June 2024)"²⁹

²⁸ See here: <https://molgroup.info/en/investor-relations/financing>

²⁹ See here: <https://www.icmagroup.org/assets/documents/Sustainable-finance/2024-updates/Handbook-Harmonised-Framework-for-Impact-Reporting-June-2024.pdf>

ALLOCATION REPORTING

The allocation reporting will include the following information, on an aggregated basis, for each eligible category:

- the amount of the identified Eligible Green Projects, per eligible category
- the balance (if any) of unallocated proceeds
- the lookback period of Eligible Green Projects, if any
- the amount or the proportion of new financing³⁰ and refinancing
- the geographic location of the Eligible Green Projects, where feasible
- the nature of the Eligible Green Projects (re)financed (Assets, CapEx and/or OpEx)
- the amount or the percentage of the Eligible Green Projects aligned with the EU Taxonomy Regulation

MOL Group will ensure that Eligible Green Projects are not allocated to multiple green and/or sustainable finance instruments.

IMPACT REPORTING

The impact report may provide the impact indicators as detailed in the table below:

GREEN ELIGIBLE CATEGORIES

CATEGORY	POTENTIAL OUTPUT INDICATORS	POTENTIAL IMPACT INDICATORS
Renewable Energy	<ul style="list-style-type: none"> ✓ Renewable energy installed capacity [MW] ✓ Annual renewable energy generation [MWh] 	<ul style="list-style-type: none"> ✓ Estimated annual GHG emissions avoided [tCO₂e/year]
Green Infrastructure	<ul style="list-style-type: none"> ✓ Pipelines installed/retrofitted [km] ✓ Low-carbon gases transported [bcm] ✓ Heat pumps installed [#] ✓ Average heating seasonal performance factor of heat pumps [BTU/kWh] ✓ Waste heat recovered [BTU] ✓ Bioenergy CCHP capacity installed [MW] ✓ Energy efficient equipment installed, including type of product [#] 	<ul style="list-style-type: none"> ✓ Estimated annual GHG emissions avoided [tCO₂e/year]
Green Products	<ul style="list-style-type: none"> ✓ Annual green hydrogen production/capacity [tH₂/year] ✓ Annual organic basic chemicals manufacturing from renewable feedstock [t] ✓ Annual plastic in primary form manufacturing from mechanical, circular and/or renewable feedstock recycling [t] ✓ Annual biogas/biofuel/bioliquid manufacturing from waste biomass [t] 	<ul style="list-style-type: none"> ✓ Estimated annual GHG emissions avoided [tCO₂e/year]
Energy Efficiency	<ul style="list-style-type: none"> ✓ Solutions, processes, technologies, business models implemented [#] 	<ul style="list-style-type: none"> ✓ Estimated annual GHG emissions reduced, avoided and/or removed [tCO₂e/year]

³⁰ New financing refers to Eligible Green Projects financed from the year issuance of each Green Finance Instrument onwards.

CATEGORY	POTENTIAL OUTPUT INDICATORS	POTENTIAL IMPACT INDICATORS
Clean Transportation	<ul style="list-style-type: none"> ✓ Number of bicycles deployed [#] 	<ul style="list-style-type: none"> ✓ Estimated annual GHG emissions avoided [tCO₂e/year]
Sustainable water and wastewater management	<ul style="list-style-type: none"> ✓ Energy efficiency measures implemented [#] ✓ Water loss control measures implemented [#] ✓ Population equivalents of the wastewater treatment systems (by capacity) [p.e] 	<ul style="list-style-type: none"> ✓ Estimated annual energy savings [kWh/m₃] ✓ Estimated (annual) reduction in water losses [m₃/year or ILI] ✓ Estimated annual amount of wastewater reused [m₃/year]
Circular Economy Adapted Products, Production Technologies and Processes	<ul style="list-style-type: none"> ✓ Share / amount of annual hazardous / non-hazardous waste collected and/or transported [% / t] ✓ Number / share of population with access to waste collection [# / %] ✓ Area with improved regular waste collection service [m²] ✓ Share / amount of annual residual non-separated waste [% / t] ✓ Share / amount of annual hazardous / non-hazardous waste treated (including material recovery, composting and/or anaerobic digestion) [% / t] ✓ Material recovery rate [%] ✓ Polluting emissions / contaminants removed, controlled, contained, and/or diminished [t] 	<ul style="list-style-type: none"> ✓ Estimated annual avoided waste to landfill [million containers]

Depending on availability and subject to confidentiality agreements, MOL Group might seek to complement above indicators with relevant case studies. MOL Group may appoint specialized consultants to develop a methodology for the estimation

and calculation of the impacts that were made publicly available. Further MOL Group may report also on the potential social co-benefits associated with the Eligible Green Projects.

EXTERNAL REVIEW

SECOND PARTY OPINION (PRE-ISSUANCE)

MOL Group has obtained an independent Second Party Opinion from Sustainable Fitch to assess the alignment of the framework with the ICMA Green Bond Principles 2025 and the LMA/APLMA/LSTA Green Loan Principles 2025. The independent Second Party Opinion will be published on MOL Group's official webpage³¹.

VERIFICATION (POST-ISSUANCE)

MOL Group will request annually until full allocation (or until maturity), a limited or reasonable assurance report on the allocation of an amount equivalent to (net) proceeds from each Green Finance Instrument to the Eligible Green Projects, provided by its external auditor (or any subsequent external auditor).

³¹ See here: <https://molgroup.info/en/investor-relations/financing>

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