

## Anti-Corruption Policy of MVM CEEnergy Zrt.

Our company, MVM CEEnergy Zrt. – as a member of the MVM Group, which is a key actor in the Hungarian and regional energy system – plays a significant role in the Hungarian natural gas supply market and – also in line with the strategic goals of the MVM Group – seeks to continue its active involvement and strengthen its position in the regional natural gas markets, as well.

The Company's above-mentioned key role also involves a great responsibility to ensure the integrity of the organisation, including the fight against corruption. For this reason, MVM CEEnergy Zrt. is committed to fighting corruption, so it explicitly prohibits and opposes all forms of corruption, takes definite actions to prevent and combat it, and thus establishes, maintains and develops a management system (Anti-Corruption Management System) operated in accordance with the ISO 37001:2019 Anti-Corruption Management Systems standard.

Therefore the management of MVM CEEnergy Zrt.

- reasonably ascertains the moral integrity of the person selected or nominated, prior to employment or appointment to a particular position in the organisation;
- requires full compliance with the anti-corruption legislation and the internal regulations;
- regularly reviews the risk of corruption in its organisation and in the business processes related to its activity for all forms of corruption;
- sets and reviews anti-corruption targets annually, and implements measures to achieve them;
- is committed to meeting the requirements of the Anti-Corruption Management System;
- encourages the expression of honest and legitimate concerns in confidence, without fear of retaliation;
- communicates the Anti-Corruption Policy within and outside the organisation;
- ensures that the requirements of the Anti-Corruption Management System are integrated into the organisational processes;
- promotes the development of an anti-corruption organisational culture;
- is committed to the continuous development of the Anti-Corruption Management System.

In this spirit, the management of MVM CEEnergy Zrt. allows and encourages the reporting of any attempt or suspicion of corruption, or any violation or deficiency of the Anti-Corruption Policy and the Anti-Corruption Management System, in good faith or based on reasonable belief (whether directly or via an appropriate

third party), even anonymously, by e-mail to [compliance@ceenergy.hu](mailto:compliance@ceenergy.hu) and through other contact details published on the Company's website.


In operating the Anti-Corruption Management System, the Company's Compliance support organisation has the responsibility and competence regarding anti-corruption compliance. They act independently when performing their tasks, and provide advice and guidance with regard to the Anti-Corruption Management System and corruption-related issues. They assess and, where necessary, investigate reported, identified or reasonably suspected corruption incidents and any violation of the Anti-Corruption Policy and the anti-corruption management systems.

MVM CEEnergy Zrt. refrains from establishing or maintaining business relations with partners that do not comply with the provisions of this Anti-Corruption Policy.

1 July 2023



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CEO



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Compliance support organisation