

MVM GROUP BUSINESS POLICY ON VULNERABLE CONSUMERS AND PROTECTED USERS

The MVM Group's internal values, economic interests, creditor expectations, and the increasingly extensive regulatory requirements collectively demand the most comprehensive and professional consideration of environmental, social, and governance (hereinafter: ESG) aspects, as well as their integration across all areas of operation, regardless of geographical boundaries, covering the entire consolidation scope.

In this document, consumers and users considered vulnerable and marginalized according to the ESRS¹ are understood to be those who, due to their specific circumstances, require special attention and support to ensure access to services and products, as well as the security of supply. In the document, their designated term is 'vulnerable consumers' and 'protected users'.

Based on the above, vulnerable consumers are those household customers who, due to their social status defined by law or other specific characteristics, are entitled to participate in the electricity and/or natural gas supply under special conditions. Thus, the group of vulnerable consumers includes socially vulnerable consumers and consumers with disabilities.

Protected users are also considered to be those natural gas consumers who, in the event of a natural gas supply crisis or operational disruption, are exempt from the implementation of restrictive measures or receive preferential supply during such events. Thus, the group of protected users includes household consumers, basic social service providers, and district heating producers who generate heat exclusively using natural gas for the supply of household consumers or social service providers.

The MVM Group, with regard to consumers and end-users, defines and publishes traceable indicators and targets demonstrating its sustainability performance in the following areas:

- protection of privacy,
- protection of personal data,
- access to quality information,
- access to products and services,
- availability and reliability,
- system efficiency,
- responsible market practices

Furthermore, the MVM Group pays particular attention to ensuring the lawful, prudent and fair treatment of vulnerable consumers and protected users, in accordance with the relevant legislation and internal regulations.

In the context of the present business policy, only the protection of personal data and access to products and services are considered priority topics. The other areas listed – such as the protection of privacy, reliability, access to quality information, system efficiency, and responsible market practices – are presented in detail in the *MVM Group's Consumer and End-User Business Policy*.

The MVM Group is committed, also with regard to consumers and end-users, to the principles set out in its Code of Ethics, including compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

With regard to vulnerable consumers and protected users, the MVM Group is committed to the protection of privacy, the legally defined purpose of which is to ensure the right to the protection of personal data.

In line with the above objective, the MVM Group's companies are committed to fully ensuring this statutory right of vulnerable consumers and protected users, which guarantees the lawful processing and protection of individuals' personal data.

Personal data management and data protection activities of MVM Group's subsidiaries are governed by a standardized set of rules, outlined in a Group-level Data Protection Policy, which each company adapts to its own internal personal data management and data protection regulations. For foreign subsidiaries, an English Translation

¹ The ESRS (European Sustainability Reporting Standards) is a reporting framework mandated by the European Union and regulated by Commission Delegated Regulation (EU) 2023/2772. Its purpose is to provide companies with consistent and comparable sustainability disclosures for the implementation of the CSRD Directive.

of the Data Protection Policy is also available, they must apply in accordance with the legal framework of their own country.

In addition to their general data management notices, the MVM Group's data controller companies provide separate, specific information to data subjects about their data processing related to statutory benefits for vulnerable consumers and protected users. This includes data processing related to the provision of statutory benefits and/or special treatment by the respective MVM Group member companies for socially disadvantaged vulnerable consumers and consumers vulnerable consumers with disabilities.

MVM Group undertakes to provide mandatory and regular data protection training to its employees by applying lawful data management procedures to reduce the number of data protection incidents arising from potential ignorance, negligence, or improper work performance.

With regard to access to quality information, the MVM Group, through its energy retail companies, places increased emphasis on the principle of transparency. To ensure this, it strives for clarity, transparency, predictability, and the continuous availability, completeness and clarity of the necessary quality information in its communications to consumers – including vulnerable consumers and protected users. To this end, business terms and conditions, information on service prices, and bill explanations are made available through customer service channels and on the website.

It is of high importance to the MVM Group that its services are not only accessible to all customers, but also provide appropriate support, personalized administration options, and increased attention to those customer groups requiring special care and service – including vulnerable consumers and protected users.

In order to uphold social responsibility and the principle of equal treatment, the MVM Group pays particular attention to protecting those consumer groups that require special support or preferential conditions. In this context, the Group places emphasis on considering the situation of consumers requiring protection and protected users in its operations, as well as on maintaining the availability and security of the services provided to them.

Particular attention is given to socially vulnerable or disabled consumers, as well as—within the group of protected consumers in the natural gas supply—household customers, basic social service providers, and district heating producers that generate heat for the supply of household consumers or basic social service providers.

For these consumer groups, the MVM Group prioritizes ensuring conditions for barrier-free administration and providing safer access to services. In the event of extraordinary situations affecting the security of natural gas supply – particularly crises or operational disruptions – protected users are exempt from the implementation of restrictive measures and receive prioritized, enhanced service to ensure the continuity of supply.

To this end, we provide our protected consumers with access to the following options:

- Installment payments and payment deferrals are offered to our consumers in need.
- Prepaid meters can be installed upon request to ensure the continuity of energy supply.
- We cooperate with municipal debt management programs to ensure that support reaches those in need as quickly and efficiently as possible.
- Our personal customer service offices are largely accessible, allowing consumers with mobility limitations to visit us.
- Appointments can be scheduled at personal customer service offices to reduce waiting times.
- We provide even billing options: annual consumption can be paid in equal monthly amounts/quantities, avoiding temporarily high bills.
- Bill explanations have been prepared to facilitate easier understanding of our invoices.
- Consumers with disabilities can request accessible bills.
- Providing users with disabilities the option to settle their bills in cash at the place of consumption.
- We ensure the possibility of online administration and provide assistance with the necessary online registration.
- For consumers with disabilities, we provide an uninterruptible power supply (UPS) in cases of verified medical necessity.

In addition, the MVM Group places particular emphasis on earning and maintaining the trust of its customers. Accordingly, it takes all necessary measures to maintain up-to-date knowledge of customer expectations and the quality of customer relationships. To this end, the Group conducts general and targeted inquiries with its customers regarding its operations and services, carries out surveys, and regularly evaluates customer feedback.

The purpose of these activities is to enable the corporate to systematically consider the interests, needs, and specific aspects of each consumer group in its strategic and operational decisions. In this way, the MVM Group ensures that its business policy, service development, and customer management practices are aligned with consumer expectations, legal requirements, and the principles of social responsibility.

The MVM Group actively cooperates with its consumers and end-users, regularly consulting them and taking their feedback into account to improve services and achieve sustainability goals. Through its customer relationship channels, it ensures continuous dialogue and collaborative problem-solving. To ensure proper information for vulnerable consumers and protected users, our licensed companies regularly inform the affected consumers and publish informational materials, which are also available on the websites of the MVM Group companies engaged in natural gas and electricity trading, retail and distribution activities.

The MVM Group reviews its business policy regarding vulnerable consumers and protected users every two years and makes it publicly accessible on its website in both Hungarian and English.

Within the MVM Group, the CEO of MVM Ltd. and the Deputy CEO for Customer Relations assume responsibility for the implementation of the provisions set out in the policy and take the necessary steps and measures to ensure their fulfillment.

This announcement is published in Hungarian and English languages. In case of any contradiction between these two versions, the Hungarian version shall prevail.