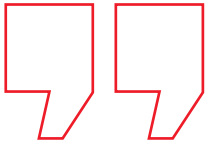




BUSINESS PARTNER CODE OF ETHICS



Regardless of the place of operation, MOL Group is determined to do business the right way and committed to ethics and integrity, and we strive for partnership in this regard as well.

MOL Group Business Partner Code of Ethics is the essence of MOL Group Code of Ethics and Business Conduct containing the norms we consider particularly important in our business relations, and we also expect our business partners to comply with these norms, however, it is not interchangeable with the MOL Group Code of Ethics and Business Conduct that we ask our business partners to be familiar with.

Business partners include suppliers, contractors, service providers, customers, transaction partners, advisors, sponsorship or corporate giving co-operation and other contracted partners of MOL Group companies, whom MOL Group expects to follow the highest standards of business ethics including but not limited to the following.

- 1. Ethical Values** – MOL Group business partners are expected to adhere to the ethical values of LAW ABIDING, RESPONSIBILITY, INTEGRITY, RESPECT, HONESTY, FAIRNESS, CARING, RELIABILITY and ACCOUNTABILITY as described in the MOL Group Code of Ethics and Business Conduct.
- 2. Human rights** – MOL Group business partners shall respect human rights during their operations including but not restricted to Right to Life and Dignity, Liberty and Security of the Person, Right to the Highest Attainable Standard of Health, Right to Just and Favourable Conditions of Work, Rights to Fair Wages and a Decent Living, Right to an Adequate Standard of Living, Right to Form and Join a Trade Union and Right to Collective Bargaining, Freedom from all forms of Forced or Compulsory or Child Labour, Freedom of Opinion and Religious Belief and Peaceful Assembly, Right to Rest, Free Time and Regular Paid Leave.
- 3. Fair labour practices** – MOL Group business partners shall not tolerate any form of forced, bonded and child labour, in addition shall commit themselves to implementing a fair policy of employment and remuneration in compliance with applicable laws.
- 4. Health, safety and environmental protection (HSE)** – MOL Group business partners regardless of their core activities' HSE relevancy shall comply with the relevant health, safety and environmental protection laws and regulations all times.
- 5. Avoidance of discrimination** – MOL Group business partners shall not discriminate against anybody on the grounds of any professionally non-relevant trait or situation like sex, marital status, age, ethnic origin, colour, religion and political conviction, disability or sexual orientation.
- 6. Communication** – MOL Group business partners are expected to follow the highest standards of conduct in all verbal and written communication based on mutual trust.

7. **Anti-Harassment** – MOL Group business partners shall not engage in behaviour that could be characterised as offensive, intimidating, humiliating, malicious or insulting.
8. **Information security** – MOL Group business partners shall handle information related to other business partners as confidential, in accordance with the applicable confidentiality provisions. Business partners shall adopt proper security measures to assure confidentiality, integrity and availability of information. Business partners shall respect that valuable, confidential ideas, strategies and other types of business information created or developed at MOL Group represent company property, and in certain cases they are under the protection of intellectual property law.
9. **Avoiding insider trading** – MOL Group business partners shall not unlawfully use insider information for material gain or disclose insider information to unauthorised persons. Business partners must never spread false market rumours having impact on financial instruments.
10. **True statements and reports** – MOL Group business partners shall never compromise the integrity of any financial statement and report and shall act in accordance with legal and ethical bookkeeping practices.
11. **Assets** – MOL Group business partners shall assume responsibility for ensuring the integrity, adequate and economical use of MOL Group property they have access to or having impact on.
12. **Anti-Corruption** – MOL Group business partners shall commit themselves to conducting their business free of any and all forms of corruption or bribery including facilitation payments and fraud. This commitment shall include staying away from offering or giving and the rejection of propositions of any kind of benefit, or any such attempts made to, by or on behalf of their employees, organisations or intermediaries aiming at unlawfully influencing or deceiving anyone.
13. **Avoiding conflicts of interest** – MOL Group business partners shall not engage in relations with MOL Group company employees in a way that could cause conflict of interest, including but not limited to employing persons who are employees of any MOL Group company (except in case of dual employment agreed by the relevant MOL Group company); allowing employee of any MOL Group company to personally invest, acquire property or shares in their companies, except of acquiring shares of publicly listed companies. MOL Group business partners are expected to avoid and disclose any further situation that could cause – or apparently cause – conflict of interests with MOL Group.
14. **Fair competition** – MOL Group business partners shall conduct their operations in accordance with the norms of fair competition and in conformity with applicable competition laws. MOL Group does not support the unethical practice of withholding payments or ‘chain of debts’ in its value chain and MOL Group business partners shall apply measures to avoid this in their own supply chains.
15. **Compliance with international trade restrictions** – MOL Group business partners shall comply with and make all efforts to follow all applicable trade rules, controls, restrictions, sanctions and import-export embargos. MOL Group business partners are expected to disclose every related information if they or any of their affiliates are affected by such measures.
16. **Products and services** – MOL Group suppliers shall strive for quality, safe and secure product or service. MOL Group suppliers shall provide highest attainable quality and safest delivery that can be expected according to product and service specifications; supply timely; disclose true, reliable, precise and clear information to every customer and do not worsen deliberately or negligently expected quality excellence.
17. **Privacy** – MOL Group business partners shall respect people’s privacy and comply with personal data protection laws; only acquire and keep personal information that is necessary and provide adequate information to data owners in compliance with the law. MOL Group business partners shall adopt proper security measures to assure confidentiality, integrity and availability of information.



MOL Group has a zero tolerance policy on corruption, cartels, major human rights violations and breaches of health, safety and environmental protection rules.

MOL Group business partners are expected to demonstrate – in proportion to the operation size, complexity and risk environment – commitment to these principles through compliance and by having adequate measures in place (i.e. own equivalent code of conduct/ethics, similar policy or other type of management commitment and means to uphold it) enabling adherence to these expectations, relevant and applicable laws and regulations.

MOL Group business partners shall ensure that every stakeholder (i.e. everybody and anybody who is affected by MOL Group operations or by MOL Group business partner's operation pursued on behalf of or for MOL Group; e.g. employees, sub-contractors, service providers, etc.) is informed of the above expectations and their application. MOL Group expects its business partners to cascade, apply and follow the above provisions also throughout the entire chain of their own suppliers, sub-contractors, service providers and business partners.

To further enhance compliance with the above norms, MOL Group business partners shall also strive for better understanding of the full content of the MOL Group Code of Ethics and Business Conduct available at MOL Group companies' websites, and should strive for fully ensuring compliance with every aspect.

Should you have any questions or complaints concerning ethics, or wish to report any unethical conduct, please contact MOL Group Ethics Council. MOL Group will not tolerate any retaliation against people reporting compliance issues or raising concerns in good faith.



MOL Group Compliance & Ethics whistle-blower "Speak Up!" page and Email: <https://molgroup.info/en/about-mol-group/speak-up> or <https://mol.hu/hu/molrol/speak-up>; speakup@molgroup.info

Mailing address: MOL Group Ethics Council, H-1117 Budapest, Dombóvári út 28.

Email: ethicscouncil@mol.hu

24-hour phone with an answering machine: (+36 1) 464-1725 (ordinary land line) or 21-725 (intercom).

For further information please visit www.molgroup.info or www.mol.hu

WE REQUEST YOU TO SUPPORT OUR EFFORTS AIMING AT ETHICAL BUSINESS CONDUCT!

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MEMBERS OF MOL GROUP

