

MVM GROUP'S POLICY ON CONSUMERS AND END-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.

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

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.

The MVM Group reviews its Policy on Consumers and End Users every two years and makes it publicly available on its website in both Hungarian and English.

Within the MVM Group, the Chief Executive Officer of MVM Ltd. assumes responsibility for the implementation of the commitments set out in this Policy and takes the necessary actions and measures to ensure their fulfilment.

1. Privacy and personal data protection

MVM Group is committed to protecting the privacy of its Consumers and End-users, with the legal objective of ensuring the right to personal data protection.

The subsidiaries of the MVM Group are committed to fully guaranteeing the above-mentioned legal right of consumers and end-users, ensuring the lawful processing and protection of personal data of natural persons.

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

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.

2. Access to quality information

In terms of access to quality information, the MVM Group, through its energy retail companies, places particular emphasis on the principle of transparency. To ensure this, the Group strives for clarity, openness, predictability, and the continuous availability, completeness, and comprehensibility of essential quality information in its communications with consumers and end-users. To this end, the Group makes its business codes, service pricing information, and billing explanations available through its customer service channels and on its official website.

Through its companies with customer relations, MVM Group makes its news, information, regulation and general terms and conditions that are relevant to their orientation in the contractual period available on its website to all its customers. Customers of MVM Group have the possibility of personal contact through customer service centers. Other contact methods include call centers, written communication, and dedicated contact persons who provide professional support with a high level of industry knowledge and experience, all with a customer-oriented approach.

MVM Group also places great emphasis on increasing the energy efficiency of its customers and has a dedicated team of experts to facilitate these goals. It is therefore committed to providing comprehensive services of improvement of energy efficiency.

Another priority of MVM Group is to keep its customers informed about current electricity and natural gas market news, related industry information, innovations, the Company's professional achievements and developments.

In addition to the above, the MVM Group pays special attention to earning and maintaining the trust of its customers. Therefore, it makes every effort to ensure that it has up-to-date knowledge of customer expectations and the quality of its customer relations. Accordingly, the MVM Group conducts both general and targeted surveys among its customers regarding its operations and services. The purpose of these feedback activities is to achieve industry excellence and the highest possible level of customer support indicators, while maintaining the MVM Group's market-leading position.

3. Access to products and services

The MVM Group actively cooperates with its consumers and end-users, engages in regular consultations with them, and takes their feedback into consideration to improve its services and achieve its sustainability goals. Through its customer relationship channels, the Group ensures continuous dialogue and collaborative problem-solving.

MVM Group provides all of its customers with easy and fast access to its services. To this end, it operates a customer service in compliance with the applicable legal requirements. It places great emphasis on maintaining and continuously enhancing its digital customer service channels, providing customers with flexible, easily accessible, and fast service in every aspect.

In the competitive market, MVM Group aims to accommodate each customer's unique habits and ensure the necessary level of collaboration in the energy sector through customized bilateral contractual agreements. It also dedicates to adhering to legal requirements and actively participates in all energy customer moratoria and composition programs, striving to offer comprehensive information and easy access for all parties involved.

MVM Group views its customers as equal partners and does not abuse its market leadership. All members of the Group actively respond to fluctuations in energy stock market prices in a cooperative manner, doing their utmost in portfolio management to mitigate their impact and minimize market risks for both their individual customers and customers in general. At the same time, they are constantly working to identify and respond to current market needs, adapting their supply structures accordingly while preparing for the future. The Group considers various pricing needs and trends, continually improving them.

By developing a methodology for managing deviations from contracted volumes and adopting a customer-oriented approach, it establishes a tolerance band within which, deviations are allowed without penalty.

The MVM Group offers its customers the possibility to choose the pricing method based on the settlement of their consumption.

4. Availability and reliability, system efficiency

MVM Group is continuously working on reducing network losses to ensure the sustainable operation of the distribution system operator. In this regard, it also conducts inspections to detect irregular requisition.

Through availability, readiness, and business continuity, it ensures that traders, and ultimately consumers and end-users, have access to the energy they need with minimal interruptions, and ensures proper maintenance.

MVM Group also commits to supporting the integration of renewable energy producers into the grid through targeted investments and strives to minimize the affected areas during its operations, with the objective of the least disruption, thereby ensuring the continuity of electricity generation.

MVM Group, through the system operator, commits to maintaining the power balance of the system to ensure the stability of the national electricity grid's frequency. For all distribution system operator, the goal has been set to minimize losses.

5. Responsible market practices

MVM Group ensures strict compliance with the law and provides non-discriminatory customer service, in accordance with its contractual obligations.

The MVM Group is committed to taking appropriate corrective actions in the event that its activities result in adverse human rights impacts. To this end, the Group operates grievance mechanisms and ensures that access to remedies is available to all affected parties.

It aims to ensure energy security and continuity through its planning and procurement policies, supporting long-term operational stability. To ensure the security of supply, the duration and renewal of commercial contracts are determined in advance, in alignment with the current market situation. The Group continuously adjusts its commercial service portfolio and contractual terms to reflect the current regulatory environment and any anticipated factors influencing the energy market.

MVM Group's commercial business policy aims to provide fair service to all interested businesses demanding energy supply.