

## MVM Group Equal Opportunities Plan and Non-Discrimination Policy

The objective of the Equal Opportunities Plan is to prevent all forms of discrimination and to ensure equal treatment and equal opportunities for MVM Group employees.

MVM Group strives to create a working environment where differences among individuals are accepted and valued. Our goal is to create a working environment where our employees can work in a diverse, supportive team and inclusive culture, and where they can contribute to the best of their abilities.

A diverse workforce is not only a legal and moral requirement, it is also a business imperative, essential to the delivery of business strategy. Teams with diverse backgrounds and experience deliver the best ideas and solutions. At MVM Group, we believe that a diverse and inclusive environment contributes to fostering and sustaining innovation, creativity and a non-discriminatory culture.

Pursuant to Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities (hereinafter referred to as the "Equal Opportunities Act"), MVM Group applies the following equal opportunities plan.

### 1. General provisions

#### 1.1. Constitutional principles

Hungary will guarantee the fundamental rights of all citizens irrespective of any distinction, such as race, colour, sex, disability, language, religion, political or other opinion, national or social origin, property, birth or other status; it will take special measures to promote equal opportunities and social inclusion; it will take special measures to protect families, children, women, the elderly and people with disabilities.

Women and men have equal rights. [Fundamental Law, Article XV]

The State will also endeavour to apply new technical solutions and the results of science in order to promote equal opportunities [Fundamental Law, Article XXVI].

#### 1.2. General civil law principles

Everyone shall respect human dignity and the inherent rights of the individual. Rights of privacy are protected by law. [Civil Code 2:42 § (2)]

The right to privacy is violated, inter alia, by discrimination against a person. [Civil Code § 2:43]

#### 1.3. Protecting the rights of people with disabilities

If someone is unlawfully disadvantaged because of his or her disability, he or she will have all the rights prevailing in case of violation of the rights of privacy. [Fot. § 27]

#### 1.4. Equal treatment

Pursuant to the requirement of equal treatment, employees and groups or organisations of employees shall be treated with the same respect and consideration, taking equal account of individual aspects. [Ebkvtv. § 1]

#### 1.5. Violation of the equal treatment requirement

The requirement of equal treatment is in particular violated by:

- a. direct discrimination,
- b. indirect discrimination,
- c. harassment,
- d. unlawful segregation,
- e. retaliation,
- f. an instruction to do any of the above

## 1.6. Derogatory provisions

Unless otherwise provided by law, the following conduct, measures, conditions, omissions, instructions or practices (hereinafter together referred to as "provisions") do not violate the requirement of equal treatment:

- a. which, in an unavoidable case, restricts a fundamental right of the prejudiced party in order to enforce another fundamental right of the same party, provided that the restriction is suitable and proportionate for achieving the intended purpose;
- b. which, in cases not covered by point (a), has a reasonable cause directly related to the given legal relationship, according to an objective assessment.

The derogative provision specified in points (a) and (b) shall not apply in the case of direct discrimination on grounds of race, colour, nationality or ethnic origin or unlawful segregation.

## 1.7. Reference to the Code of Ethics

The provisions and objectives of the Equal Opportunities Plan shall be interpreted and applied in conformity with the provisions and aspirations of the KIE-19 MVM Group Compliance Central Policy (hereinafter referred to as the Compliance Policy), the KIE-19-M-03 MVM Group Code of Ethics (hereinafter referred to as the Code of Ethics) and the local Code of Ethics of each company.

## 1.8. Reference to the Collective Agreement, Social Agreements and Training Plan

The implementation of the Equal Opportunities Plan and the concrete measures shall take into account the provisions specified in MVM Group's group-level collective agreements, MVM Group's group-level social agreements and training plans, as well as the local collective agreements, social agreements and training plans of each company.

## 2. Direct discrimination

Direct discrimination is interpreted as a provision or measure leading to a situation where a person or group of persons is, has been or would be treated less favourably, whether because of an actual or perceived disadvantage, than another person or group in a comparable situation due to the following reasons: his or its

- a. sex,
- b. racial or ethnic origin,
- c. skin colour,
- d. nationality,
- e. membership in ethnicity,
- f. mother tongue,
- g. disability,
- h. state of health,
- i. religious or philosophical beliefs,
- j. political or other opinions,
- k. marital status,
- l. maternity (pregnancy) or paternity (fatherhood),
- m. sexual orientation,
- n. sexual identity,
- o. age,
- p. social origin,
- q. financial situation,
- r. the part-time or fixed-term nature of employment or other employment relationship,
- s. membership in an interest group,
- t. other location, property or characteristic (hereinafter collectively referred to as "property").

## 3. Indirect discrimination

Indirect discrimination is interpreted as a provision or measure leading to a situation where a person or group of persons with the characteristics set out in point 2 is disadvantaged to a significantly greater extent than another person or group in a comparable situation was, is or would be, which situation does not constitute direct discrimination and which appears to satisfy the requirement of equal treatment.

## 4. Harassment

Harassment is defined as conduct with degrading, sexual or other nature related to a characteristic of the person concerned as defined in point 2, and which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment towards a person.

## 5. Unlawful segregation

Unlawful segregation is a provision or measure which, without being expressly permitted by law, on the basis of the characteristics set out in point 2, separates a person or a group of persons from persons or a group of persons in a comparable situation.

## 6. Retaliation

Retaliation is interpreted as a conduct which causes, seeks to cause or threatens to cause legal harm to a person who objects to, initiates or participates in proceedings for breach of the requirement of equal treatment.

## 7. Preferential treatment

A provision or measure aiming at the elimination of unequal treatment of an explicitly identified social group based on an objective assessment, if it is based on a law or a government decree or collective agreement issued pursuant to a law and is limited in time or until a definite condition is fulfilled, does not constitute a breach of the requirement of equal treatment, provided that it does not violate a fundamental right, does not confer an unconditional advantage and does not exclude the consideration of individual aspects.

## 8. Enforcing equal treatment in employment

### 8.1. Prohibition of discrimination

MVM Group does not discriminate, either directly or indirectly, in the following:

- a. access to employment, in particular public job advertisements, recruitment, terms and conditions of employment;
- b. in the context of a measure relating to the procedure preceding and facilitating the establishment of an employment or other relationship with the aim of providing work or services;
- c. the establishment and termination of employment or other relationship with the aim of providing work or services;
- d. in relation to the training received before or during the work;
- e. in establishing and providing working conditions;
- f. the benefits payable under the employment or other relationship with the aim of providing work or services, in particular the benefits provided for in the determination and guaranteeing of wages as defined in Article 12 (2) of the Labour Code;
- g. in relation to membership or participation in employees' organisations;
- h. in the career development system;
- i. in the enforcement of liability for damages or disciplinary liability, as well as
- j. in the context of requesting or taking parental leave to facilitate the harmonisation of parental and employee responsibilities and to increase the time available for childcare.

### 8.2. Derogatory provisions

Proportional discrimination based on all relevant and legitimate conditions of employment which are justified by the nature or characteristics of the work will not constitute a violation of the requirement of equal treatment.

In the application of point 8.1. f., any discrimination in relation to the characteristics set out in points 2. a) to 2. e) will in all cases constitute a violation of the requirement of equal treatment.

## 9. Obligation to give preferential treatment

A law, a government decree or a collective agreement authorised by law may impose an obligation of preferential treatment on a specific category of employees in connection with the employment or other relationship with the aim of providing work or services.

## 10. Groups receiving special attention

MVM Group pays special attention to the following employment groups, in particular with regard to their treatment:

- a. women,
- b. expectant mothers,
- c. parents of three or more minor children,
- d. employees with disabilities,
- e. employees caring for a relative who is permanently ill or seriously disabled,
- f. employees above 55 years of age.

## 11. Registrations

The registration of membership in the group detailed in point 10 is based on voluntary consent (declaration, statement, notification) of the employee, in addition to the data which are not obvious, but are already available or have been previously processed in accordance with legislation.

## 12. Objectives promoting equal opportunities

### 12.1. For women

Supporting women's employment quality, professional and managerial promotion and their involvement in decision-making.

### 12.2. For expectant mothers

Increased protection of pregnant mothers at work, applying flexible forms of employment.

### 12.3. For parents of three or more minor children

Maintaining a balance between work and private life for parents with above-average family responsibilities, and improving their employment quality. Applying flexible forms of employment and taking specific aspects into consideration when approving leave/holidays.

### 12.4. For parents and employees providing care for children under 8 years of age

For parents providing care for children under 8 years of age, the use of flexible forms of employment, maintaining a balance between work and private life.

### 12.5. For employees with disabilities

To promote employment opportunities for employees with disabilities, to improve their working conditions, to establish, maintain and, where possible, improve wheelchair accessibility in the workplace.

### 12.6. For employees providing care for a long-term sick or seriously disabled relative

Maintaining the employment of employees providing care for long-term sick or seriously disabled relatives, and maintaining a balance between their work and private life.

### 12.7. For employees above 55 years of age

Utilising the industry- and career-specific skills of employees above 55 years of age, with longer professional and practical work experience, and retaining their employment.

## 13. Specific programmes and actions to promote equal opportunities

### 13.1. For women

MVM Group supports the participation of women in training and career development programmes.

MVM Group supports women to become managers.

MVM Group facilitates the reintegration and readmission of mothers returning from caring for their child at home, for this purpose it keeps in touch with mothers during the childcare period, provides information on training, holidays and other opportunities.

### 13.2. For expectant mothers

MVM Group provides enhanced protection of pregnant mothers at work, and supports the use of flexible and atypical forms of employment.

### 13.3. For parents of three or more minor children

MVM Group supports the use of atypical forms of employment.

When approving leave/holidays, MVM Group will take into account, as far as possible, the breaks in the operation of childcare and educational institutions.

MVM Group facilitates the reintegration and readmission of parents returning from caring for their child at home, for this purpose it keeps in touch with mothers during the childcare period, provides information on training, holidays and other opportunities.

13.4. For parents and employees providing care for children under 8 years of age

MVM Group supports the use of atypical forms of employment.

When approving leave/holidays, MVM Group will take into account, as far as possible, the breaks in the operation of childcare and educational institutions.

13.5. For employees with disabilities

In the design and development of working conditions, MVM Group takes into account the special needs of people with disabilities (in the design of transport routes for people with reduced mobility, and controls of passenger lifts for blind and people with visual impairments).

13.6. For employees providing care for a long-term sick or seriously disabled relative

MVM Group supports the use of atypical forms of employment.

13.7. For employees above 55 years of age

In selecting, employing and promoting employees, MVM Group gives equal weight not only to the qualifications, skills and abilities required for the job, but also to the competence and experience. MVM Group considers long professional, practical work experience and the reliability based thereon to be just as important a criterion as other skills and competences.

MVM Group supports employees over 55 to learn new skills, transfer their professional experience and retain their employment.

13.8. Procedures and remedies

In the case of a well-founded suspicion of any form of discrimination, violation of equal treatment and equal opportunities, employers will act on their own initiative or on the basis of a complaint by the employee.

When investigating and examining all the circumstances of the case, taking the necessary measures and further developing the equal opportunities plan, equal treatment and equal opportunities, the Group will act in accordance with the relevant rules of the Compliance Directive, the Code of Ethics and related company regulations. Compliance or ethics procedures do not preclude employees from seeking legal remedies.