

ANTI-CORRUPTION POLICY

The senior management of European Power Services Zrt. (hereinafter: EPS) is committed to fighting corruption in all spheres of the activities of the internationally owned energy company it manages. It expressly prohibits and opposes corruption in all its forms, takes decisive steps to prevent and deter it, and therefore voluntarily undertakes to apply the key requirements of the MSZ ISO 37001:2019 Anti-Corruption Management Systems standard, which cover the prevention, detection and management of corruption, and the commitment to compliance with anti-corruption legislation.

As a joint venture of the MVM Group and a participant in international energy projects, European Power Services Zrt. has a key responsibility in the fight against corruption. In this capacity, it has an essential role to play in contributing to the fight against corruption at group level through its activities, the implementation of its strategic objectives and its professionalism.

In view of the foregoing, the management of European Power Services Zrt.:

- ✓ requires full compliance with the anti-corruption legislation and the internal regulations;
- ✓ regularly reviews the risk of corruption in its organisation and the business processes related to its activity, addressing all forms of corruption;
- ✓ sets and reviews anti-corruption objectives annually, and implements measures in order to achieve them;
- ✓ encourages the expression of concerns arising in good faith and/or justifiably, without the fear of retaliation;
- ✓ communicates the Anti-Corruption Policy within and outside the organisation;
- ✓ supports the development of the organisational culture of anti-corruption;

In the spirit of the above, the senior management of European Power Services Zrt. allows and encourages the reporting of any attempt at or suspicion of any breach 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 letter or e-mail at the email address: compliance@eupowers.hu or compliance@mvm.hu.

Responsibility and authority for the Compliance Function lies with the Chief Executive Officer. Corporate compliance activities are carried out by the Officer in charge of the Compliance Function. In the course of the performance of his/her tasks, the Officer provides advice and guidance in connection with the Anti-Corruption standards, as well as matters related to corruption. The Officer assesses and, where necessary, investigates reported, identified or reasonably suspected corruption events, as well as any breach of the Anti-Corruption Policy.

European Power Services Zrt. refrains from establishing or maintaining business relationships with third parties that do not comply with the provisions of the Anti-Corruption Policy.

I undertake to abide by this policy!

Budapest, 30 March 2023



Domonkos Medgyesy
Chief Executive Officer