

MOL Group Economic Sanctions Compliance Policy

The MOL Group “MOL CHARTS” is designed to convey the core values to be embraced by all group employees. “MOL CHARTS” is disseminated within the MOL Group to act as a guide and reminder to keep compliance as a Top Priority and to ensure that actions comply with social norms and the highest ethical standards, as well as to seize the initiative in social issues and take responsibility for your behavior.

We recognize business risks arising from economic sanctions (hereinafter referred to as “Economic Sanction Risks”) is a very real peril and therefore pledge to conduct fair and responsible business activities by implementing appropriate risk management measures to improve business operations and satisfy the expectations of all stakeholders.

1. Basic Policy

The MOL Group recognizes compliance with economic sanctions-related laws applicable to its business activities as a critical issue. Accordingly, the MOL Group conducts its business activities after confirming the legality of each transaction in accordance with such laws.

In addition, taking into consideration the nature of its business activities and transaction structures, the MOL Group identifies and assesses Economic Sanction Risks and implements preventive and mitigating measures commensurate with the level of such risks and seeks to minimize such risks.

2. Scope of Application

This Policy applies to all executives and employees of the MOL Group.

We also expect all business partners involved in our business activities to support this Policy.

3. Compliance

All executives and employees of MOL Group companies shall understand the importance of Economic Sanction Risks and economic sanctions-related laws and shall conduct their business activities in accordance with this Policy.

4. MOL compliance structure

As part of its efforts to address Economic Sanction Risks in the execution of its business activities, the MOL Group has established internal rules and defines fundamental matters to be addressed by each organization with respect to compliance with economic sanctions-related laws.

5. Updates on Economic Sanctions-Related Laws

The MOL Group continuously monitors the latest developments in economic sanctions, as well as amendments to and revisions of economic sanctions-related laws, and shall review and update its measures for addressing Economic Sanction Risks as necessary.

6. Education and Communication

The MOL Group provides education and awareness-raising activities regarding Economic Sanction Risks for executives and employees of Group companies.

Established in June, 2026