

# KYC questionnaire for gas market

---

In order to ensure efficient cooperation, KELER CCP Central Counterparty Ltd. (hereinafter: KELER CCP) need to know and understand its existing and future clients and their activities. On this basis, the Risk Know Your Customer Questionnaire (hereinafter: Questionnaire) is introduced.

In line with the General Business Rules and the applicable Announcements of KELER CCP, filling out the Questionnaire forms part of the mandatory annual reporting obligation, and in the case of new clients it is one of the entry terms. The Questionnaire requests information related to your Company that KELER CCP needs in order to have as comprehensive information as possible for risk management purposes.

KELER CCP Ltd. reserves the right to change the content of this Questionnaire in full or in part, any time, without any restrictions, subject to the applicable legal requirements.

Please note that some of the questions in the Questionnaire require documents to be attached / sent. Please make sure that the attachment is in Hungarian or English. If documents in other languages are attached, additional questions may be asked in order to obtain information.

**By completing the Questionnaire, we acknowledge and accept the above terms and conditions and comply with them, we declare that the provided data, information are complete and correct.**

Date:

Signature:

## I. Company information

1. Please provide the following information about the Company you represent (Company):

Company name:

Short Company name:

Place of registration:

Time of registration:

***Registered office:***

Country:

ZIP code:

City:

Street name:

Street number:

***TAX number (EU, or local TAX number):***

- ☐ EU Tax number:
- ☐ If the company does not have EU Tax number, please state the local Tax number:

***LEI code:***

- ☐ LEI code:
- ☐ The Company does not have a LEI code.

**HELP: LEGAL ENTITY IDENTIFIER. IF THE COMPANY DOES NOT HAVE A LEI CODE, PLEASE LEAVE THE FIELD BLANK!**

***EIC code:***

- ☐ EIC code:
- ☐ The Company does not have a EIC code.

**HELP: ENERGY IDENTIFICATION CODE. IF THE COMPANY DOES NOT HAVE A EIC CODE, PLEASE LEAVE THE FIELD BLANK!**

**2. Does the Company have a website?**

- ☐ Yes / If yes, please provide the link to the website of the Company.

Website link:

- ☐ No

**3. Is the Company licensed by any energy regulatory authority to trade energy products?**

- ☐ No
- ☐ Yes / Please state the name and website name of the licensing energy regulatory authority in the table below.

Energy regulatory / authority name	Energy regulatory / authority website name

**4. Please declare if the Company was fined by the competent energy market supervisory authorities in the past 3 years (related to operational and trading activities).**

- ☐ No
- ☐ Yes / In the following table, please state the name of the authority that levied the fine, the amount and currency of the fine, and the reason of the imposed fine.

Name of authority imposing the fine	Amount and currency of fine imposed	Reason for fine imposed


**5. Do any of the following apply to the Company?**

- ☐ Yes
- ☐ Listed company.
  - ☐ Company with more than 50% direct or indirect state ownership.
  - ☐ Subject to the legal framework for the prevention of money laundering (or 100% owned subsidiary of a company that is subject to money laundering prevention rules).
- ☐ No

**6. Please name the direct owners of the Company with more than 10% holding in the Company. If you leave the table blank, we consider that you have declared that there is no owner with a share of more than 10% in the Company.**

Name	Ownership (%)

**7. Do the owners of the Company have shares in other companies in excess of 20%?**

- ☐ No
- ☐ Yes / Please name these companies.

**8. Please attach a document which fully presenting the Company's entire ownership structure and the shareholding percentages(direct or indirect holdings, share of ownership).**

HELP: PLEASE ATTACH THE OWNERSHIP STRUCTURE FILE TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSZFREPORTING@KELERKSZF.HU). THE FORMAT OF THE ATTACHED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

**9. Please list the press releases about the Company published in the last 12 months that you consider significant. If available on the Internet, please state the hyperlink to the article.**

Media name	Hyperlink

**10. Please state the number of employees of the Company.**

**11. Please attach the organizational chart of the Company.**

HELP: PLEASE ATTACH THE ORGANIZATIONAL CHART FILE TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSZFREPORTING@KELERKSZF.HU). THE FORMAT OF THE ATTACHED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

**12. Has the Company been part of a merger or division or has the ownership of the Company changed during the last business year?**

☐ Yes / Please detail the changes:

☐ No

**13. Is the main activity of the Company directly linked to energy or commodity trading?**

- ☐ Yes  
☐ No

**14. Please describe (i) what the Company wish to achieve with the role of clearing membership, and (ii) the strategy of the Company for the next 3 to 5 years \*.**

*\* KELER CCP Ltd. treats the provided information confidentially in accordance with the legal provisions on business secrets and securities secrets.*

**15. Is the Company a financial institution subject to [575 / 2013 EU regulation](#) (commonly known as CRR)?**

- ☐ Yes  
☐ No

**16. Please list the countries where the Company currently provides services.**

**17. Does the Company have**

• any offices, transactions, investments, activities or planned activities in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela,

or

• any dealings with any individual or entity located, resident, or organized in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela, or with any entity directly or indirectly owned or controlled by any entity located, resident, or organized in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela, in each case, including with Intermediaries acting on behalf of or engaging in related Dealings with Russian / Belarusian / Donetsk, Luhansk regions / Crimean / Cuban / Iranian / North Korean / Sudanese / Syrian / Venezuelan entities

or

- banking relationship with Russian-based or Belorussian-based banks?

- ☐ No  
☐ Yes

If the answer for the previous question is YES please specify these (i) transactions, investments, activities or (ii) planned transactions, investments, activities (iii) dealings (iv) the percentage of these to the Company's total revenue and / or assets, and (v) name the banks, (vi) the services provided by the banks to the Company, (vii) how the provided services affect the financial capability, liquidity and trading activity of the Company.

**18. List the Company's top 5 business partners. If the Company is not currently trading, please indicate.**

**19. If the Company has a clearing membership with a central counterparty (CCP) other than the clearing membership with KELER CCP, please fill in the table below as follows:**

ESMA recommends that the National Competent Authorities ensure that supervised CCPs consider in their participation requirements and as part of the initial and ongoing assessment of the credit worthiness of their clearing members, the amount of losses that their members could be exposed to, due to their participation in multiple CCPs taking into account the potential losses of mutualized pre-funded and non-pre-funded resources, on the basis of data that need to be provided by clearing members.” ([Link to the report](#) - page 60.)

Based on the clearing members’ feedback KELER CCP will evaluate the exposures in line with ESMA recommendation.

- ☐ No, the Company does not have a clearing membership relationship with another CCP.  
☐ Yes, the Company has a clearing membership relationship with another CCP.

If the Company has a clearing membership other than the clearing membership with KELER CCP, then please fill in the below table.

**The total exposure of the clearing member towards CCPs on 31th December of the latest closed business year (including exposures to KELER CCP arising from gas market clearing membership).**

**Please state the currency (EUR, USD etc.)**

Pre-funded resources  
(e.g. contribution to default fund)

.....

Non-pre-funded resources  
(pl.: assessment powers committed)

.....



## II. Financials

**1. Please attach the most recent audited annual report of the Company that was signed by the auditor. If available electronically, please state a hyperlink that directs to the annual report.**

**If the Company was founded in the latest 6 months, then please attach the company extract.**

PLEASE ATTACH THE AUDITED FINANCIAL STATEMENT TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSFREPORTING@KELERKSF.HU). THE FORMAT OF THE UPLOADED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

***Hyperlink to the annual report:***

HELP: BY ATTACHING THE AUDITED ANNUAL REPORT WITH APPROPRIATE CONTENT OR STATING THE HYPERLINK TO THE PUBLIC AND OFFICIAL WEBSITE YOU MEET THE APPLICABLE REPORTING OBLIGATION. FOR MORE DETAILS ON THE REPORTING OBLIGATION, PLEASE REFER TO POINTS 8.5. OF THE GENERAL BUSINESS RULES OF KELER CCP LTD. IF YOU COMPLETE THE QUESTIONNAIRE AS PART OF ENTERING KELER CCP LTD., THE DATA OF THE ANNUAL REPORT ATTACHED HERE WILL BE USED TO CHECK SHAREHOLDERS' EQUITY, FOR MORE DETAILS PLEASE REFER TO POINTS 8.4.

**2. Please state the following details related to the annual report of the Company:**

***Balance sheet date:***

***How much time does the Company have to prepare and / or disclose your financial statement (calculated from the balance sheet date) in the country where your company is seated?***

***In case the Company has more than 9 months (calculated from the balance sheet date to prepare your financials) please indicate the proper regulation which justifies it.***

**Please mark and fill in the one below that is appropriate for the Company:**

- ☐ There is an audited report available.
  - ☐ Annual report was audited by:
  - ☐ The annual report was prepared in line with the following reporting standards:
    - ☐ National
    - ☐ International / Please state the name of the international reporting standards (e.g. IFRS, US GAAP):
- ☐ There is no audited report available.

### III. Operating capacities

#### III/1. Ensuring and availability of liquidity

1. Please describe the Company's liquidity management framework, including how the Company ensures the availability of necessary liquidity to maintain normal continuous day-to-day trading activity. In addition, which tools ensure the establishment of the necessary liquidity demand in a market stress situation (e.g. significant change in margin requirements, intraday margin call, increased guarantee fund contribution)?

2. Is the parent company / owner(s) of the Company able to financially support the Company in case of liquidity issues?

- ☐ Yes
- ☐ No
- ☐ N/A, justification:

3. I declare that the Company is always capable of ensuring the required liquidity by its available tools and resources to be able to maintain its future/planned and current trading activities at any time.

- ☐ Yes
- ☐ No

### III/2. Ability to interface with financial systems

1. I undertake that the Company will establish and continuously maintain access to its bank accounts held at settlement banks, thus I undertake that the Company will always be technically capable of ensuring the funds required within the appropriate deadline on the settlement account for the settlement of financial obligations arising from clearing membership.

- ☐ Yes
- ☐ No

2. I undertake that the Company will establish and continuously have a backup solution which enables the Company to be technically capable of ensuring the funds required for the settlement, on its settlement account with the settlement banks within the appropriate deadline.

- ☐ Yes  
Presentation of a backup solution:

- ☐ No

3. I declare that the Company can fulfill its obligations towards KELER CCP directly to KELER CCP in case of any obstacles arising in connection with the settlement account.

- ☐ Yes
- ☐ No

4. I declare that the Company can deal with operational obstacles due to different working days and/or national (bank) holidays.

- ☐ Yes
- ☐ No

### **III/3. Availability of appropriate IT systems related to clearing membership**

**1. I declare that the Company has the primary software and applications used for electronic communication (e-mail) with KELER CCP, these tools are always ensured and the Company can receive the e-mails sent by KELER CCP.**

☐ Yes

☐ No

**2. I declare that the Company has a backup solution that is technically able to ensure the electronic communication with KELER CCP and able to receive e-mails sent by the KELER CCP.**

☐ Yes

Presentation of a backup solution:

☐ No

### III/4. Required expertise, experience, risk management within the Company

**1. Please name the traders of the Company:**

Name	Full time / part time	Other companies, where the trader was employed in the past 5 years.	Trading experience (year)

**2. If at least 2 traders have not been named, filling in the following statement is mandatory.**

**Given the lack of minimally sufficient resources (2 people due to substitutability), I declare that the Company has backup solutions that ensure the smoothness and continuity of the trading process.**

☐ Yes

Presentation of a backup solution:

☐ No

**3. Please describe the Company's trading decision process, including internal approval procedure.**

**4. Please describe the solutions of the Company which are dedicated to ensure the trading activity. If the solutions are performed by the parent company / outsourced, please indicate.**

	Please describe in some sentences.	The solution is provided by the parent company/ outsourced by a third party	If the solution is provided by the parent company/ third party, please explain how the Company manage the related risks, how supervise the function?
IT systems / resources  (e.g. name of software and purpose of use, outsourced activity)			
Backup solutions  (e.g. cloud solutions)			
Dedicated trading department  (if any, and what work schedule they work on (e.g. 7 / 24)			
Backoffice department  (if any, and what work schedule they work on (e.g. 7 / 24)			

**5. Please attach the completed template provided by KELER CCP showing the Company's planned trading volume for the current gas year.**

HELP: THE FORMAT OF THE ATTACHED DOCUMENT CAN BE: XLSX.

**6. I declare, the Company has a framework for the management of operational risks and a BCP plan or other solutions ensuring business continuity, the continuous operation of clearing, and also the trading and operational processes preceding clearing.**

- ☐ Yes
- ☐ No

**7. Please describe how the Company manages operational risks?**

**Please mark the company profile of the Company:**

- ☐ Company with natural gas trading license with no limitation  
*Please fill in additional questions in **part III/4./A***
- ☐ Company with limited natural gas trading license  
*Please fill in additional questions in **part III/4./B***
- ☐ System operator, distributor (TSO, DSO)  
*Please fill in additional questions in **part III/4./C***
- ☐ Natural gas producer  
*Please fill in additional questions in **part III/4./D***
- ☐ End user  
*Please fill in additional questions in **part III/4./E***



### III/4./A - Questions for companies with not limited natural gas trading license

**1. Has the Company registered on regulated trading platforms other than those settled by/through KELER CCP?**

- ☐ No
- ☐ Yes / Please state the name of the platform:

**2. Is the Company involved in OTC trades?**

- ☐ No
- ☐ Yes / Please state the estimated share of OTC trades in total trading turnover (in %):

**3. In addition to proprietary trading, does the Company also trade on behalf of clients?**

- ☐ No
- ☐ Yes / Please state the estimated share of agency trading in total trading turnover (in %):

**4. In which of the following activities is the Company actively engaged?**

- ☐ End-user supply (retail),..... %.
- ☐ Wholesale

*Help: Natural gas turnover in the previous gas year, as a percentage of total natural gas sales.*

**5. What data does the Company use to plan its annual gas turnover? (On the one hand, please indicate the elements the Company is considering and on the other hand, briefly explain the planning strategy.)**

- ☐ Previous gas year gas turnover by point of delivery (POD)
- ☐ Previous gas year gas turnover at portfolio level
- ☐ Expected annual gas turnover at portfolio level, monthly breakdown
- ☐ Expected customer loss, customer gain effects
- ☐ Expected effects of market changes

☐ Other:

Description of the planning strategy:

**6. What data does the Company use to plan the next gas year's supply to end users?**

- ☐ Previous gas year gas turnover by point of delivery (POD), broken down by month
- ☐ Expected annual gas turnover by point of delivery (POD), per hour
- ☐ Information received from the end users
- ☐ Expected resources
- ☐ Expected effects of market changes
- ☐ Other:

**7. Does the Company apply customer ratings?**

- ☐ Yes, for bidding and contracting, in all cases
- ☐ Yes, for bidding and contracting, but not in all cases
- ☐ Yes, but only in relation to the risk classification related to solvency
- ☐ We perform a complex risk assessment for all potential customers
- ☐ We do not rate our customers

*Comment:*

**8. Does the contracts with customers include guarantees for the event of customer default?**

- ☐ Yes, for some customers, but not in all cases
- ☐ Yes, in all cases
- ☐ Usually not

**9. What types of guarantees do the contracts with customers include to reduce the counterparty risks of smaller customers?**

- ☐ Bank guarantee
- ☐ Prepayment
- ☐ Deposit, other guarantees
- ☐ Take or Pay (TOP) condition system
- ☐ We do not require a guarantee
- ☐ Other:

**10. What types of guarantees do the contracts with customers include to reduce the counterparty risks of larger costumers?**

- ☐ Bank guarantee
- ☐ Prepayment
- ☐ Deposit, other guarantees
- ☐ Take or Pay (TOP) condition system
- ☐ We do not require a guarantee
- ☐ Other:

**11. How does the Company procure the natural gas to be sold?**

- ☐ Already during the campaign period, before the start of the gas year, we have the vast majority of the expected required resources provided by wholesale contracts (OTC).
- ☐ Only at the end of the campaign period, before the start of the gas year, we contract for the necessary resources (OTC).
- ☐ We continuously close positions during the campaign period using OTC or stock exchange transactions, we do not leave open positions.
- ☐ We start with many open positions, we use trade deals to provide resources.
- ☐ Other:

**12. In the case of variable price sales contracts that take into account current exchange price movements,**

- ☐ the procurement of natural gas for supply is also carried out at current prices, taking into account the exchange price movements in all cases
- ☐ the procurement of natural gas for supply is mostly also carried out at current prices, taking into account the exchange price movements
- ☐ the procurement of natural gas for supply is rarely carried out at current prices, taking into account the exchange price movements
- ☐ Other:

**13. In the case of fixed-price sales contracts,**

- ☐ the purchase of natural gas for supply is always covered by exchange transactions (e.g. hedges)
- ☐ the natural gas required for the supply is mostly purchased through a fixed price OTC contract
- ☐ the purchase of natural gas for the supply is also conceivable on the basis of undefined open positions
- ☐ Other:

**15. Have any defaults of trading counterparties occurred against the Company during the last 12-month period?**

- ☐ Yes / If yes, please specify how many times and the concerned value of the amounts:
- ☐ No

**III/4./B - Questions for companies with limited natural gas trading license**

**1. Has the Company registered regulated on trading platforms other than those settled by/through KELER CCP?**

- ☐ No
- ☐ Yes / Please state the name of the platform:

*Help: Please state the regulated trading platforms where the Company is present not as a (non-) clearing member of KELER CCP Ltd. Regulated trading platform e.g. ICE, POLPX, OPCOM.*

**2. Is the Company involved in OTC trades?**

- ☐ No
- ☐ Yes / Please state the estimated share of OTC trades in total trading turnover (in %):

**3. In addition to proprietary trading, does the Company also trade on behalf of clients?**

- ☐ No
- ☐ Yes / Please state the estimated share of agency trading in total trading turnover (in %):

**4. What contract type does the Company use?**

- ☐ EFET
- ☐ EFET and individual contracts
- ☐ Individual contracts

**5. What types of guarantees do the contracts with customers include to reduce the counterparty risks of smaller customers?**

- ☐ We use EFET contracts
- ☐ Bank guarantee
- ☐ Prepayment
- ☐ Deposit, other guarantees
- ☐ Take or Pay (TOP) condition system
- ☐ We do not require a guarantee
- ☐ Other:

**6. Please describe the partner (procurement) risk management tools of the Company.**

**7. Have any defaults of trading counterparties occurred against the Company during the last 12-month period?**

- ☐ Yes / If yes, please specify how many times and the concerned value of the amounts:
  
- ☐ No

**III/4./C - Questions for system operators, distributors (TSO, DSO)****1. Does the Company use a trading platform to manage its transactions?**

- ☐ No
- ☐ Yes / Please list in which cases:

*Help: for example, selling produced natural gas, buying natural gas to improve gas quality, etc.*

**2. Has the Company registered on regulated trading platforms other than those settled by/through KELER CCP?**

- ☐ No
- ☐ Yes / Please state the name of the platform:

*Help: Please state the regulated trading platforms where the Company is present not as a (non-) clearing member of KELER CCP Ltd. Regulated trading platform e.g. ICE, POLPX, OPCOM.*

**3. Is the Company involved in OTC trades?**

- ☐ No
- ☐ Yes / Please state the estimated share of OTC trades in total trading turnover (in %):

**4. In addition to proprietary trading, does the Company also trade on behalf of clients?**

- ☐ No
- ☐ Yes / Please state the estimated share of agency trading in total trading turnover (in %):

**5. What is the Company's natural gas procurement process for network and metering losses during system operation?**

- ☐ Public procurement procedures, call for tenders.
- ☐ We always conclude fixed-price supply contracts.
- ☐ We always conclude variable price contracts, that take into account the current exchange price movements.
- ☐ We always follow the procurement process required by the regulatory authority.

*Comment:*

**6. When setting the regulated prices, the costs incurred are taken into account by the Authority during the cost review. Is that a significant risk for the Company?**

- ☐ No, our turnover based on the regulated prices largely covers our costs.
- ☐ Yes, the turnover based on the regulated prices is continuously under the necessary costs.

*Comment:*

**7. Please describe the partner (procurement) risk management tools of the Company.**

**8. Have any defaults of trading counterparties occurred against the Company during the last 12-month period?**

- ☐ Yes / If yes, please specify how many times and the concerned value of the amounts:
  
- ☐ No



**III/4./D - Questions for natural gas producers**

**1. Does the Company use a trading platform to manage its transactions?**

- ☐ No
- ☐ Yes / Please list in which cases:

*Help: for example, selling produced natural gas, buying natural gas to improve gas quality, etc.*

**2. Has the Company registered on regulated trading platforms other than those settled by/through KELER CCP?**

- ☐ No
- ☐ Yes / Please state the name of the platform:

*Help: Please state the regulated trading platforms where the Company is present not as a (non-) clearing member of KELER CCP Ltd. Regulated trading platform e.g. ICE, POLPX, OPCOM.*

**3. Is the Company involved in OTC trades)?**

- ☐ No
- ☐ Yes / Please state the estimated share of OTC trades in total trading turnover (in %):

**4. In addition to proprietary trading, does the Company also trade on behalf of clients?**

- ☐ No
- ☐ Yes / Please state the estimated share of agency trading in total trading turnover (in %):

**5. Does the Company have a 1-5 year technical design per production field?**

- ☐ No
- ☐ Yes
- ☐ Yes, but not for all fields.

**6. Is it necessary to technically manage the natural gas quality issues in most of the fields owned by the Company (use of mixing gas, mixing of the production of several fields, etc.)?**

- ☐ No
- ☐ Yes

*Comment:*

**7. Does the Company have its own commercial organizational unit to handle natural gas sales tasks?**

- ☐ Yes, it has.
- ☐ No, it hasn't.

*Comment:*

**8. Does the Company have its own dispatcher who can handle production-related flexibility issues?**

- ☐ Yes, it has.
- ☐ No, it hasn't.

*Comment:*

**9. What natural sales process does the Company operate in the course of natural gas production?**

- ☐ We typically enter into contracts on an OTC basis.
- ☐ We sell mainly through exchange transactions.

*Comment:*

**10. In general, do the Company's contracts with customers include penalties for underperformance (lower-than-planned production, lower quality natural gas, etc.)?**

- ☐ No
- ☐ Yes

*Comment:*

**11. Does the Company apply customer ratings?**

- ☐ Yes, for bidding and contracting, in all cases.
- ☐ Yes, for bidding and contracting, but not in all cases.
- ☐ Yes, but only in relation to the risk classification related to solvency.
- ☐ We perform a complex risk assessment for all potential customers.
- ☐ We do not rate our customers.

*Comment:*

**12. Do the contracts with customers include guarantees for the event of customer default?**

- ☐ Yes, for some customers, but not in all cases.
- ☐ Yes, in all cases.
- ☐ Usually not.

**13. What types of guarantees do the contracts with customers include to reduce the counterparty risks of customers?**

- ☐ Bank guarantee.
- ☐ Prepayment.
- ☐ Deposit, other guarantees.
- ☐ Take or Pay (TOP) condition system.
- ☐ We do not require a guarantee.
- ☐ Other:

**14. When setting the sales price, the Company basically takes into account the following:**

- ☐ Market situation, supply and demand conditions.
- ☐ Cost of production and a predictable margin with non-fixed price construction.
- ☐ Cost of production and a predictable margin with fixed price construction.

*Comment:*

16. Have any defaults of trading counterparties occurred against the Company during the last 12-month period?

- ☐ Yes / If yes, please specify how many times and the concerned value of the amounts:
- ☐ No

**III/4./E - Questions for end users**

**1. Has the Company registered on regulated trading platforms other than those settled by/through KELER CCP?**

- ☐ No
- ☐ Yes / Please state the name of the platform:

*Help: Please state the regulated trading platforms where the Company is present not as a (non-) clearing member of KELER CCP Ltd. Regulated trading platform e.g. ICE, POLPX, OPCOM.*

**2. What is the share of natural gas costs in the Company's total cost?**

- ☐ 1-25 %
- ☐ 26-50 %
- ☐ 51-75 %
- ☐ 76-99 %

**3. What data does the Company use to plan its annual gas turnover? (On the one hand, please indicate the elements the Company is considering and on the other hand, briefly explain the planning strategy)**

- ☐ Previous gas year gas turnover.
- ☐ Expected annual gas turnover, monthly breakdown.
- ☐ Expected hourly peaks.
- ☐ Expected effects of market changes.
- ☐ Expected effects of corporate operations.
- ☐ Other:

Description of the planning strategy:

**4. If the Company purchases natural gas at current prices following the current exchange price movements, does it carry out market risk management operations (hedging, etc.)?**

- ☐ Yes
- ☐ No

**5. How does the Company procure the natural gas?**

- ☐ Before the start of the gas year, we contract to all the necessary resources (OTC).
- ☐ We start with open positions the gas year, and we use daily trade transactions to ensure the resources.
- ☐ Other:

**6. In the case of fixed-price sales contracts,**

- ☐ the purchase of natural gas for supply is always covered by exchange transactions (e.g. hedges).
- ☐ the natural gas required for the supply is mostly purchased through a fixed price OTC contract.
- ☐ the purchase of natural gas for the supply is also conceivable on the basis of undefined open positions.

**7. Please describe the partner (procurement) risk management tools of the Company.****8. Have any defaults of trading counterparties occurred against the Company during the last 12-month period?**

- ☐ Yes / If yes, please specify how many times and the concerned value of the amounts:
  
- ☐ No