

Information on Trade Data under MiFID II

The HUDEX Energy Exchange Ltd. ("HUDEX") complies with Article 11 of (EU) 2017/567 Regulations with the following documents at the links below.

a) The date of the most recent modifications of the terms of accessing market data, the actual schedule of fees, the discount policy, regarding the fees of our market data can be found at the following links below:

- https://hudex.hu/uploads/riportok/HUPX%20Group%20Information%20package%20fees_2018.pdf
- <https://hudex.hu/uploads/Info%20user-Data%20vendor/HUPX%20group%20info%20user%20agreement.pdf>
- <https://hudex.hu/uploads/Info%20user-Data%20vendor/HUPX%20group%20info%20vendor%20agreement.pdf>

b) Future price changes related to accessing data will be published by HUDEX at least 90 days in advance of the modification.

c) Information on the content of market data, including the number of covered assets, the total turnover of the covered assets and any other type of data in addition to the market data can be found at the links below:

- https://hudex.hu/uploads/riportok/HUDEX_Aggregated_Market_report_power_INFO_public.docx.pdf
- https://hudex.hu/uploads/riportok/HUDEX_Daily_Market_report_power_INFO_public.pdf
- https://hudex.hu/uploads/riportok/HUDEX_Post_trade_report_power_INFO_public.pdf
- https://hudex.hu/uploads/riportok/HUDEX_Aggregated_Market_report_GAS_INFO.pdf
- https://hudex.hu/uploads/riportok/HUDEX_Daily_Market_report_GAS_INFO.pdf
- https://hudex.hu/uploads/riportok/HUDEX_Post_trade_report_GAS_INFO.pdf
- https://hudex.hu/uploads/riportok/PhF_Aggregated_report_INFO_public.pdf
- https://hudex.hu/uploads/riportok/PhF_Daily_report_INFO_public.pdf

d) With regards to the revenue generated by providing access to the market data and its ratio to the total revenue of HUDEX, the Company does not have any official (audited) data yet, as the Company has been carrying out its activity subject to MiFID II regulation since January 2018.

e) HUDEX provides the following information about the price setting method, including the applied cost allocation method and also explains the guiding rules of cost allocation between the direct and indirect costs of production and distribution of market data and other services provided by HUDEX.

HUDEX examines the costs based on its nature defined by management accounting, and assigns them cost driver to allocate them between the activities.

During the pricing of the market data HUDEX takes into account the costs that can be considered – which can be linked to data vending – with the ratio of the total costs, applying the following method:

- During the pricing of the stock exchange data HUDEX takes into account the full amount of contributor's fee and system license fees incurred by the data vending;
- System usage fees and other direct, variable IT costs (including depreciation) are taken into account based on the proportion of data vending and other stock activity users;
- Marketing costs are taken into consideration based on the proportion of data vending and other stock activity users
- Administrative costs are taken into considerations based on the proportion of invoices linked to the activity
- Rental fee and other operating costs are taken into consideration by using the average of the following allocation keys (proportion of invoices linked to data vending and proportion of data vending users)

Price for market data are based on prime cost and distribution costs. The reasonable margin for market data applied to the actual costs incurred is determined by HUDEX taking into account the return on revenue, return on costs and market conditions.

f) HUDEX decided not to make market data available on a „per user basis” since to charge on such a basis is disproportionate to the cost and manpower need of making that data available, having regard to the scale and scope of the data.