



EGYÜTT. VELED

ANNUAL REPORT

OF MAGYAR TELEKOM TELECOMMUNICATIONS
PUBLIC LIMITED COMPANY

FOR THE YEAR ENDED DECEMBER 31, 2021



SEPARATE FINANCIAL STATEMENTS AND MANAGEMENT REPORT

OF MAGYAR TELEKOM TELECOMMUNICATIONS
PUBLIC LIMITED COMPANY

FOR THE YEAR ENDED DECEMBER 31, 2021



INDEX TO THE SEPARATE ANNUAL REPORT

SEPARATE FINANCIAL STATEMENTS	4
STATEMENT OF FINANCIAL POSITION - ASSETS	5
STATEMENT OF FINANCIAL POSITION – LIABILITIES AND EQUITY	6
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME	7
STATEMENT OF CASH FLOWS	8
STATEMENT OF CHANGES IN EQUITY	9
NOTES TO THE SEPARATE STATEMENT OF CHANGES IN EQUITY	10
NOTES TO THE SEPARATE FINANCIAL STATEMENTS	11
1 GENERAL INFORMATION	11
2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES	12
3 CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS	15
4 FINANCIAL INSTRUMENTS	21
5 FINANCIAL RISK MANAGEMENT	41
6 INCOME TAXES	48
7 INVENTORIES	52
8 ASSETS AND LIABILITIES HELD FOR SALE	52
9 PROPERTY, PLANT AND EQUIPMENT (PPE).....	53
10 INTANGIBLE ASSETS	57
11 INVESTMENTS	61
12 OTHER ASSETS	64
13 PROVISIONS	64
14 OTHER CURRENT LIABILITIES	66
15 OTHER NON-CURRENT LIABILITIES	66
16 EQUITY	66
17 LEASES	68
18 REVENUE.....	73
19 DIRECT COSTS.....	78
20 EMPLOYEE-RELATED EXPENSES.....	78
21 OTHER OPERATING EXPENSES.....	80
22 OTHER OPERATING INCOME.....	81
23 INTEREST INCOME.....	81
24 INTEREST EXPENSES.....	81
25 OTHER FINANCE EXPENSES – NET	82
26 RESULTS OF INVESTMENTS	82
27 EARNINGS PER SHARE (EPS).....	83
28 PURCHASE OF PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS	83
29 PURCHASE OF SUBSIDIARIES	83
30 CONTINGENT ASSETS AND LIABILITIES.....	84
31 PURCHASE COMMITMENTS.....	84
32 RELATED-PARTY TRANSACTIONS	84



33 REPORTABLE SEGMENTS AND INFORMATION ABOUT GEOGRAPHICAL AREAS	87
34 REGULATED MARKETS AND PROCEDURES	88
35 EVENTS AFTER THE REPORTING PERIOD.....	91
BUSINESS REPORT	92
Declaration	126



SEPARATE FINANCIAL STATEMENTS

OF MAGYAR TELEKOM TELECOMMUNICATIONS PUBLIC LIMITED COMPANY

FOR THE YEAR ENDED DECEMBER 31, 2021

PREPARED IN ACCORDANCE WITH

INTERNATIONAL FINANCIAL REPORTING STANDARDS
AS ENDORSED BY THE EUROPEAN UNION

(EU IFRS)

STATEMENT OF FINANCIAL POSITION - ASSETS

(in HUF millions)	Note	At December 31,	At December 31,
		2020	2021
ASSETS			
Cash and cash equivalents.....	4.2.1	738	945
Trade receivables.....	4.2.2	118,967	121,846
Other assets.....	12.1	2,626	4,305
Other current financial assets.....	4.2.3.1	41,720	8,254
Contract assets.....	18.4	12,006	13,158
Current income tax receivable.....	6	7	-
Inventories.....	7	12,643	13,214
		188,707	161,722
Assets held for sale.....	8	489	115
Total current assets.....		189,196	161,837
Property, plant and equipment.....	9	350,141	355,973
Right-of-use assets.....	9.2	117,945	119,986
Goodwill.....	1.2, 10.4	173,572	173,572
Other intangible assets.....	1.2, 10	255,416	317,825
Investments.....	11	131,610	131,610
Trade receivables over one year.....	4.2.3.3	16,159	16,664
Other non-current financial assets.....	4.2.3.2	16,382	23,252
Contract assets.....	18.4	3,411	3,620
Other non-current assets.....	12.2	5,012	6,126
Total non-current assets.....		1,069,648	1,148,628
Total assets.....		1,258,844	1,310,465

Budapest, February 23, 2022

Tibor Rékasi
Chief Executive Officer, Board member

Daria Aleksandrovna Dodonova
Chief Financial Officer, Board member

The accompanying Notes form an integral part of these Separate Financial Statements.

STATEMENT OF FINANCIAL POSITION – LIABILITIES AND EQUITY

(in HUF millions)	Note	At December 31,	At December 31,
		2020	2021
LIABILITIES			
Financial liabilities to related parties	4.4.1	109,508	46,466
Lease liabilities	4.5.1.2, 17.2.2	20,224	21,332
Trade payables	4.4.4	113,992	119,407
Other financial liabilities.....	4.4.3	8,471	51,984
Current income tax payable.....	6	338	1,458
Provisions.....	13	3,006	2,173
Contract liabilities.....	18.4	7,660	8,090
Other current liabilities.....	14	17,066	13,993
Total current liabilities		280,265	264,903
Financial liabilities to related parties	4.4.1	89,457	90,405
Lease liabilities	4.5.1.2, 17.2.2	112,785	113,756
Corporate bonds	4.4.2	67,904	68,214
Other financial liabilities.....	4.4.3	71,443	106,467
Deferred tax liabilities.....	6.3.2	17,695	16,318
Provisions.....	13	9,604	12,126
Other non-current liabilities.....	15	2,907	2,474
Total non-current liabilities		371,795	409,760
Total liabilities.....		652,060	674,663
EQUITY			
Common stock	16	104,274	104,274
Capital reserves.....	16	27,379	27,379
Treasury stock	16	(9,351)	(19,566)
Retained earnings	16	484,482	523,715
Total equity		606,784	635,802
Total liabilities and equity		1,258,844	1,310,465

Budapest, February 23, 2022

 Tibor Rékasi Chief Executive Officer, Board member	 Daria Aleksandrovna Dodonova Chief Financial Officer, Board member
--	---

The accompanying Notes form an integral part of these Separate Financial Statements.

STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME

(in HUF millions, except per share amounts)	Note	For the year ended December 31,	
		2020	2021
Mobile revenue.....	1.2, 18	328,307	350,003
Fixed line revenue	1.2, 18	184,962	187,877
SI/IT revenue.....	1.2, 18	10,862	10,412
Revenue.....		524,131	548,292
Interconnect costs	1.2	(16,826)	(19,237)
SI/IT service related costs.....	1.2	(9,305)	(8,575)
Bad debt expense	1.2, 4.2.2.2	(8,609)	(9,837)
Telecom tax	1.2, 19.1	(27,572)	(26,785)
Other direct costs	1.2, 19.2	(158,652)	(168,899)
Direct costs		(220,964)	(233,333)
Employee-related expenses	20	(58,019)	(56,100)
Depreciation and amortization	9, 10	(116,872)	(122,729)
Other operating expenses.....	21	(64,895)	(63,725)
Operating expenses.....		(460,750)	(475,887)
Other operating income	22	5,040	3,261
Operating profit.....		68,421	75,666
Interest income	23	1,102	615
Interest expense.....	24	(12,190)	(13,710)
Other finance expense - net.....	25	(12,478)	113
Net financial result		(23,566)	(12,982)
Results from investments	26	8,924	5,728
Profit before income tax.....		53,779	68,412
Income tax	6.2	(12,227)	(13,868)
Profit for the period		41,552	54,544
Total comprehensive income for the period		41,552	54,544
Earnings per share (EPS) information:			
Profit attributable to the owners of the Company	27	42,364	58,997
Weighted average number of common stock outstanding used for basic/diluted EPS		1,027,117,481	1,007,460,789
Basic / diluted earnings per share (HUF)	27	41.25	58.56

Budapest, February 23, 2022

Tibor Rékasi

Chief Executive Officer, Board member

Daria Aleksandrova Dodorova

Chief Financial Officer, Board member

The accompanying Notes form an integral part of these Separate Financial Statements.



STATEMENT OF CASH FLOWS

(in HUF millions)	Note	For the year ended December 31.	
		2020	2021
Cash flows from operating activities			
Profit for the period		41,552	54,544
Depreciation and amortization	9, 10	116,872	122,729
Income tax expense	6.2	12,227	13,868
Net financial result		14,642	7,254
Change in assets carried as working capital		6,437	(7,929)
Change in provisions.....		(832)	823
Change in liabilities carried as working capital.....		(8,984)	6,002
Income tax paid	6.4	(9,311)	(11,724)
Dividend received	26	8,471	5,679
Interest and other financial charges paid.....		(19,602)	(19,731)
Interest received		820	669
Other non-cash items		(3,617)	(299)
Net cash generated from operating activities		158,675	171,885
Cash flows from investing activities			
Payments for property plant and equipment (PPE) and intangible assets.....	28	(138,523)	(92,343)
Proceeds from disposal of PPE and intangible assets		6,749	1,360
Proceeds from disposal of subsidiaries and business units		290	-
Payments for other financial assets.....		(3,201)	(96)
Proceeds from other financial assets		1,241	12,443
Net cash used in investing activities.....		(133,444)	(78,636)
Cash flows from financing activities			
Dividends paid to Owners of the parent.....	4.4.3.3	(20,853)	(15,312)
Proceeds from loans and other borrowings	4.4.3.3	239,009	219,915
Repayment of loans and other borrowings	4.4.3.3	(280,950)	(260,257)
Proceeds from corporate bonds	4.4.3.3	70,834	-
Repayment of lease and other financial liabilities.....	4.4.3.3	(28,240)	(27,173)
Treasury share purchase	4.4.3.3	(5,218)	(10,215)
Net cash used in financing activities		(25,418)	(93,042)
Change in cash and cash equivalents		(187)	207
Cash and cash equivalents, beginning of period	4.2.1	925	738
Cash and cash equivalents, end of period	4.2.1	738	945

The accompanying Notes form an integral part of these Separate Financial Statements.



STATEMENT OF CHANGES IN EQUITY

	pieces	in HUF millions				
	Shares of common stock (a)	Common stock (a)	Capital reserves (b)	Treasury stock (c)	Retained earnings (d)	Total Equity
Balance at January 1, 2020	1,042,742,543	104,274	27,379	(4,133)	463,785	591,305
Dividend (e)	-	-	-	-	(20,855)	(20,855)
Treasury share purchase (f)	-	-	-	(5,218)	-	(5,218)
Transactions with owners in their capacity as owners	-	-	-	(5,218)	(20,855)	(26,073)
Profit or loss	-	-	-	-	41,552	41,552
Balance at December 31, 2020	1,042,742,543	104,274	27,379	(9,351)	484,482	606,784
Dividend (e)	-	-	-	-	(15,311)	(15,311)
Treasury share purchase (f)	-	-	-	(10,215)	-	(10,215)
Transactions with owners in their capacity as owners	-	-	-	(10,215)	(15,311)	(25,526)
Profit or loss	-	-	-	-	54,544	54,544
Balance at December 31, 2021	1,042,742,543	104,274	27,379	(19,566)	523,715	635,802
Of which treasury stock	(45,777,539)					
Shares of common stock outstanding	996,965,004					

The accompanying Notes form an integral part of these Separate Financial Statements.

NOTES TO THE SEPARATE STATEMENT OF CHANGES IN EQUITY

- (a) The total amount of issued shares of common stock of 1,042,742,543 (each with a nominal value of HUF 100) is fully paid as at December 31, 2021. The number of authorized ordinary shares on December 31, 2021 is 1,042,742,543.

Voting Rights and Voting

The holder of each Series "A" ordinary share shall be entitled to one vote at the General Meeting of Magyar Telekom Telecommunications Public Limited Company (the Company or Magyar Telekom). The names of shareholders and nominees who intend to participate at the General Meeting shall be registered in the Share Register on the second working day prior to the starting date of the General Meeting. The General Meeting shall adopt its resolutions by a simple majority vote except for resolutions on issues listed in the Articles of Association, which shall require at least a three-quarters majority of the votes cast. There is no limitation on the rights of non-resident or foreign shareholders to hold or exercise voting rights on the ordinary shares. There is no limitation of voting rights for ordinary shares in the Articles of Association. The Company has no shares assigned with special management rights.

Transfer of Shares

In order to transfer dematerialized shares, there must be a contract for transfer or other legal title is required and, in that context, the transferor's securities account must be debited and the new holder's securities account must be credited with the transferred dematerialized shares. The holder of dematerialized share shall be considered the holder of the securities account on which the dematerialized shares are recorded.

The transfer of any Series "A" ordinary shares is not bound to any restriction or attainment of agreement.

- (b) Additional paid-in capital represents the amount exceeding the nominal value of the shares that was received by the Company during capital increases.
- (c) Treasury stock represents the cost of the Company's own shares repurchased. When the Company purchases its equity shares, the consideration transferred, including any attributable incremental external costs, are deducted from the Equity of the owners of the parent as Treasury stock until they are re-sold or canceled. When such shares are subsequently sold, the treasury share balance decreases by the original cost of the shares, thereby increasing equity, while any gains or losses are also recognized in equity (Retained earnings). Treasury stock transactions are recorded on the transaction date. The number of treasury stock on December 31, 2021 is 45,777,539 (on December 31, 2020 is 21,982,747).
- (d) Retained earnings include the accumulated and undistributed profit of the Company. The distributable reserves of the Company at December 31, 2021 amounted to approximately HUF 524 billion (HUF 484 billion at December 31, 2020). Untied retained earnings is available for the payment of dividends which contains retained earnings from the last financial year (Note 16).
- (e) Dividends payable to the Company's shareholders are recognized as a liability and debited against Retained earnings in the period in which the dividends are approved by the shareholders.
- (f) The Company repurchased own shares for HUF 10.2 billion through a share buyback auction on June 10, 2021 for the purpose of shareholders' remuneration as approved by the Company's Board of Directors on May 10, 2021 (in 2020 HUF 5.2 billion own shares were repurchased). The Company concluded repurchase transactions for 23,794,792 Magyar Telekom ordinary shares at an average price of HUF 429 per share. Following the execution of the transactions, Magyar Telekom holds 45,777,539 treasury shares.

Together with the approval of these financial statements for issue, the Board of Directors of the Company proposes a dividend distribution in total HUF 15,000 million to be approved by the Annual General Meeting of the Company in April 2022. In 2021 due to the situation caused by the coronavirus pandemic (COVID-19) the Board of Directors of Magyar Telekom approved HUF 15,311 million dividend based on the authorization set out in Section 9.§ (2) of Government Decree no. 502/2020. (XI.16.).

The accompanying Notes form an integral part of these financial statements.



NOTES TO THE SEPARATE FINANCIAL STATEMENTS

1 GENERAL INFORMATION

1.1 About the Company

Magyar Telekom is the principal provider of telecommunications services in Hungary. These services are subject to various telecommunications regulations.

The Company was incorporated in Hungary on December 31, 1991 and commenced business on January 1, 1992. The Company's registered office is Könyves Kálmán körút 36., 1097 Budapest, Hungary. Name of the Court of Registration and the registration number of the Company: Registry Court of the Budapest-Capital Regional Court, Cg. 01-10-041928.

Magyar Telekom is listed on the Budapest Stock Exchange and its shares are traded on the Budapest Stock Exchange. Magyar Telekom's American Depositary Shares (ADSs) each representing five ordinary shares were also traded on the New York Stock Exchange until November 12, 2010, when the ADSs were delisted. Magyar Telekom terminated the registration of its ADSs in the US in February 2012. The Company maintains its American Depositary Receipt program on a Level I basis.

The ultimate controlling parent of the Company is Deutsche Telekom AG (DT or DT AG) who fully consolidates Magyar Telekom Group. Deutsche Telekom Europe B.V. (Stationsplein 8, 6221 BT Maastricht, the Netherlands), a member of the Deutsche Telekom Group, is the direct owner of 59.21% of the Company's issued shares.

The Consolidated Financial Statements of DT AG are available at DT AG's website (www.telekom.com/en).

The Separate Financial Statements are prepared and presented in millions of HUF, unless stated otherwise, as the Company's presentation currency is the Hungarian Forint.

The Company's Board of Directors (the Board) accepted the submission of these Separate Financial Statements of the Company on February 23, 2022 to the Annual General Meeting (AGM) of the owners, which is authorized to approve these financial statements, but also has the right to require amendments before approval. As the controlling shareholders are represented in the Board of the Company that accepted the submission of these financial statements, the probability of any potential change required by the AGM is remote and has never happened in the past.

Persons authorized to sign the annual report:

Tibor Rékasi - Chief Executive Officer, member of the Board (residence: Szentendre)

Daria Aleksandrovna Dodonova - Chief Financial Officer, member of the Board (residence: Budapest)

In Magyar Telekom, the accounting services are coordinated by Melinda Modok (certificate number: 18128. Area of speciality: IFRS entrepreneurial activity. Status: registered. Registration number: MK 199521. Residence: Budapest).

The Company is subject to compulsory audit. The Company's auditor is PricewaterhouseCoopers Könyvvizsgáló Kft. (its register number is 01-09-063022, its taxation number is 10256161-2-44), the responsible person for carrying out the audit is Zoltán Bárdy (membership number at Chamber of Hungarian Auditors: 007346).

The Separate Financial Statements of Magyar Telekom and the Consolidated Financial Statements of Magyar Telekom Group are available at the Company's registered office and on its corporate website.

Magyar Telekom's corporate website is: www.telekom.hu

1.2 Revised presentation of financial report's hierarchy

In 2021 in order to follow the general industry practice the management has conducted the revision of the presentation hierarchy of the annual financial report to give the investors more transparent information about economic resources of the Company, claims against the Company, and their changes. As a result of the harmonization, the amount of goodwill is separated from other intangible assets in the Statements of Financial Position, revenue is disaggregated to mobile, fixed line and SI/IT (System integration and Information technology) business lines revenue data, direct costs are disaggregated to interconnect costs, SI/IT service related costs, bad debt expense, telecom tax and other direct costs in the Statements of Profit or Loss Statement. In the Statement of Cash Flow some minor adjustments in the order and wording were made.

With the changes described above, the information provided by the financial report is remained the same, all comparative information in this report was presented in the preceding years accordingly. Management believes these changes ensure more transparent and consistent financial information to the investors.

2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

2.1 Basis of preparation

The Separate Financial Statements of Magyar Telekom have been prepared in accordance with International Financial Reporting Standards (IFRS) as endorsed by the European Union (EU). All standards and interpretations endorsed by the EU are effective as at December 31, 2021 and applicable to Magyar Telekom had been adopted. These Separate Financial Statements also comply with the Hungarian Accounting Act on Separate Financial Statements, which refers to the IFRS as endorsed by the EU.

The Company as parent company also prepared consolidated financial statements in accordance with IFRS as endorsed by the EU which were approved by the Company's Board of Directors on February 23, 2022.

The preparation of financial statements according to IFRS requires the use of certain critical accounting estimates. It also requires management judgement to apply the Company's accounting policies. The areas involving a higher degree of judgement or complexity, or areas in which assumptions and estimates are significant to the Separate Financial Statements, are disclosed in Note 3.

Financial statements are prepared under going concern assumptions, which means it is assumed the Company will continue to operate in the foreseeable future without the need or intention on the part of management to liquidate the entity or to significantly curtail its operational activities.

2.1.1 Initial application of standards, interpretations and amendments in the financial year

The table below summarizes the Standards amended and the subject of the amendments effective on or after January 1, 2021 that could have an impact on Magyar Telekom's accounting policies.

Pronouncement	Title	To be applied by Magyar Telekom from	Changes	Expected impact on the presentation of Magyar Telekom's results of operations and financial position
Amendments to IFRS 4	Insurance Contracts - Deferral of IFRS 9	Jan 1, 2021	Deferral of first-time application of IFRS 9 for insurance companies.	Not applicable.
Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16	Interest Rate Benchmark Reform – Phase 2	Jan 1, 2021	The amendments address the impact of modifications of financial instruments required as a direct consequence of the IBOR reform, hedge accounting requirements, and the accompanying disclosures.	No impact based on internal assessment.
Amendments to IFRS 16	COVID-19-Related Rent Concessions beyond June 30, 2021	April 1, 2021*	Extension of practical expedient until June 30, 2022 for lessee accounting of rent concessions granted due to the COVID-19 pandemic.	Not applied.

* Earlier application is permissible. Magyar Telekom already decided in the 2020 financial year not to apply the practical expedient.

2.1.2 Standards, amendments and interpretations that are not yet effective as at December 31, 2021 and have not been adopted early by the Company and other expected changes for 2022 and 2023.

Pronouncement	Title	To be applied by Magyar Telekom from	Changes	Expected impact on the presentation of Magyar Telekom's results of operations and financial position
Standards endorsed by the EU				
Amendments to IFRS 3; IAS 16; IAS 37 and Annual Improvements 2018-2020	Business Combinations; Property, Plant and Equipment; Provisions; Contingent Liabilities and Contingent Assets	Jan 1, 2022	Package of narrow-scope amendments to three Standards as well as the Board's Annual Improvements, which are changes that clarify the wording or correct minor consequences, oversights or conflicts between requirements in the Standards.	No material impact is expected.
IFRS 17 and Amendments to IFRS 17	Insurance Contracts	Jan 1, 2023	IFRS 17 governs the accounting for insurance contracts and replaces IFRS 4. Deferral of first-time application of IFRS 17 to January 1, 2023. The amendments refer to specific topics helping entities to implement the standard and avoiding a significant loss of useful information.	No material impact is expected.
Standards not yet endorsed by the EU*				
Amendments to IAS 1	Presentation of Financial Statements	Jan 1, 2023	Classification of Liabilities as Current or Non-current and Deferral of Effective Date.	No material impact is expected.
Amendments to IAS 1	Presentation of Financial Statements	Jan 1, 2023	Disclosure of material accounting policy information instead of significant accounting policies. In addition, IFRS Practice Statement 2 has been amended.	No material impact is expected.
Amendments to IAS 8	Accounting policies, Changes in Accounting Estimates and Errors	Jan 1, 2023	Introduced a definition of 'accounting estimates' and included other amendments to help entities distinguish changes in accounting policies from changes in accounting estimates.	No material impact is expected.
Amendments to IAS 12	Income Taxes	Jan 1, 2023	Deferred Tax related to Assets and Liabilities arising from a Single Transaction	No material impact is expected.
Amendments to IFRS 17 Insurance contracts	Initial Application of IFRS 17 and IFRS 9 – Comparative Information	Jan 1, 2023	Transition option relating to comparative information about financial assets presented on initial application of IFRS 17, helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements.	Not applicable.

* For standards not yet endorsed by the EU, the date of first-time adoption scheduled by the IASB is assumed for the time being as the likely date of first-time adoption.

2.1.3 COVID-19 impact on the business and on the financial statements

After 2020, which was drastically impacted globally by the outbreak of the COVID-19 pandemic, 2021 was featured by a general recovery worldwide as the targeted government measures along with the more efficient management of the pandemic led to improved production as well as higher consumption levels.

However, the still prevailing pandemic has been reshaping the environment whereas some new economic difficulties has also emerged with global supply chain disturbances and the sharp increase in energy prices witnessed in the second half of 2021.

The telecommunication industry has continued to play a critical role in keeping families connected and businesses and the economy progressing in this changing environment.

The Company could also leverage from these developments with both revenues and profitability improving in 2021. Although we continued to face lower SI/IT project demand and decided to recognize forward-looking impairment in bad debt expense for possible deterioration of our customer base's solvency position in relation to the termination of the loan moratorium and upcoming economic difficulties, thanks to the continued improvement in telecommunication service performance reflecting continued upward trend in customer demand, both annual gross profit, EBITDA and net income exceeded previous year's levels.

The need for digitalization, demand for data and the use of online, virtual channels have reached unseen levels, highlighting the integral role of the telecommunication industry.

To reflect to these changes and to ensure the reliability and security of our networks, we continued to invest in our infrastructure. The rollout of our fiber network remained a key priority and we dedicated significant amount of capital expenditures to the expansion of our network during 2021. Furthermore, we continued with the radio access network modernization commenced in 2020 to be able to meet the sharply rising mobile data capacity demand.

Beyond the changes on the market we closely monitor the recoverability of our assets, therefore the Company has conducted the goodwill impairment test more frequently during the year and paid more attention to monitor the solvency of customers, taking into account the potential negative impacts of COVID-19. See details in Notes 3.2 and 3.3.

2.2. Functional and presentation currency

Items included in the financial statements of the Company are measured using the currency of the primary economic environment in which the entity operates, that is the Hungarian forint (HUF), which is the functional currency of the Company.

Foreign currency transactions are translated into HUF using the exchange rates prevailing on the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognized in the Profit for the year (Other finance expense – net).

3 CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the prevailing circumstances. The Company makes estimates and assumptions concerning the future. The resulting accounting estimates will, by definition, rarely equal the related actual results. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities are outlined below.

3.1 Useful lives of assets

The determination of the useful lives of assets is based on historical experience with similar assets as well as any anticipated technological development and changes in broad economic or industry factors. The appropriateness of the estimated useful lives is reviewed annually, or whenever there is an indication of significant changes in the underlying assumptions. Management believes that this is a critical accounting estimate since it involves assumptions about technological development in an innovative industry and heavily dependent on the investment plans of the Company. Further, due to the significant weight of depreciable assets in our total assets, the impact of any changes in these

assumptions can be material to the financial position of the Company, and results of operations. See Notes 9 and 10 for the changes made to useful lives in 2021.

The Company is constantly introducing a number of new services or platforms. In the frame of that, Magyar Telekom focuses on the development of 4G and 5G platforms while does not make any further developments in 3G network. Services in that platform will be ceased from second half of 2022, useful life of assets related to this technology had been revised and shortened in prior years, accordingly. Furthermore, Magyar Telekom continues the acceleration of its fiber rollout, the modernization of its ED3 network, a migration to Gigabit capable networks and the retirement of its copper networks. In the case of that, the Company conducts a revision of useful lives of the already existing platforms, but in the vast majority of the cases these new services or assets are designed to co-exist with the existing platforms, not necessarily resulting in no change-over to the new technology. Consequently, the useful lives of the existing platforms usually do not require shortening.

3.2 Estimated impairment of goodwill and investments

3.2.1 Goodwill

Goodwill is not amortized but tested for impairment annually in the last quarter of the year and in the other quarters quicktests are executed. Due to COVID-19, during the preparation of interim financial reports of 2021 the management updated its goodwill impairment test in every quarter by considering updated information on inputs like book values, foreign exchange rates and weighted average cost of capital. No impairment needed to be recognized in 2021.

On Magyar Telekom Group (“Group”) level, the Company has a considerable portion of assets and liabilities presented in the MT-Hungary segment as well as contributing a significant proportion to the result of the MT-Hungary segment. The Group’s segments are reported in a manner consistent with the internal reporting provided to the chief operating decision makers, the Chief Executive Officer (CEO) and the other Chief Officers (Chief Officers). They together fulfill the Chief Operating Decision Maker (CODM) function in the Group. The goodwill presented in the Company was tested as the considerable part of this segment when MT-Hungary segment was examined.

Since the Company as a whole is a non-separable part of the MT-Hungary segment, therefore the impairment test presented below is in reference to the MT-Hungary segment of the Magyar Telekom Group. The recoverable amounts of the operating segments are calculated based on fair value less cost of disposal (FVLCD) determined by the discounted projected cash flows of the operating segments over the next ten years with a terminal value. This is highly judgmental, which carries the inherent risk of arriving at materially different recoverable amounts if estimates used in the calculations proved to be inappropriate. The Company has an implemented policy to make the impairment test based on a 10-year cash flow projection on reasonable and supportable assumptions that present the management’s best estimate on market participants’ assumptions and expectations. The MT-Hungary segment uses 10-year cash flow projections as the payback period of our investments in the telecommunications operations often exceeds five years.

The recoverable amounts of the operating segments are determined by the operating segments’ fair values less cost of disposal. In the calculations, Magyar Telekom uses weighted average cost of capital (WACC) and estimated perpetual growth rate (PGR). The WACCs are determined based on the capital asset pricing model (CAPM) using the average betas of the peer group, 10-year zero-coupon yields and a debt ratio in line with the usual indebtedness of listed peer telecommunications companies, while the PGRs used are in line with the long-term average growth rate for the particular segment.

Costs of certain central functions that are not cross charged are also considered in the fair value calculations when conducting the goodwill impairment tests. The costs of these central functions are allocated to the operating segments based on the segments’ revenue share of the Group’s total revenue.

The fair value less cost of disposal of the MT-Hungary segment far exceeds its carrying amount and Magyar Telekom represents a non-separable but significant part of the MT-Hungary segment therefore impairment of goodwill did not need to be recognized either in 2021 or in 2020. See Note 10.4 for details of carrying amount of goodwill allocated to segments.

The following tables show the WACCs and PGRs used in the fair value calculations of the Group’s operating segments for the goodwill impairment test conducted in 2020 and 2021. The tables below also include sensitivity analyses that show how much impairment would have been recognized as at December 31, 2020 or 2021 for the goodwill allocated to the operating segments if we changed the sensitive parameters in the calculations.

In 2021 we disclose what impact a 4 (2020: 4) percentage point increase of the WACC would have on the goodwill. Regarding the PGRs, we disclose what impact a 9 (2020: 10) percentage point decrease of the PGR would have on the goodwill. Regarding the cash flow projections, we disclose what impact a 20% or a 32% (2020: 20% or 44%) lower than projected cash flow stream would have on the goodwill.

	2020	2021
	MT-Hungary	
WACC		
Used in the calculation.....	5.68%	7.95%
If changed to	9.68%	11.95%
Potential impairment (HUF million).....	41,909	49,140
PGR		
Used in the calculation.....	1.0%	1.0%
If changed to	(9.0%)	(8.0%)
Potential impairment (HUF million).....	23,476	7,746
Cash flow		
If changed by	(20%)	(20%)
Potential impairment (HUF million).....	-	-
If changed by	(44%)	(32%)
Potential impairment (HUF million).....	12,754	10,828

The table below shows what changes can be observed in the 10-year plans prepared in 2020 following to those prepared in 2021.

	MT-Hungary
Cumulative average annual change rate of revenue during the 10 years compared to 2021.....	0.3%
Cumulative average annual change rate of revenue during the 10 years compared to 2020.....	0.5%
Cumulative average annual change rate of EBITDA during the 10 years compared to 2021.....	0.7%
Cumulative average annual change rate of EBITDA during the 10 years compared to 2020.....	0.6%
Cumulative average annual change rate of Capex during the 10 years compared to 2021..... (a)	(4.2%)
Cumulative average annual change rate of Capex during the 10 years compared to 2020..... (a)	(5.0%)

(a) In 2020 and 2021, the Company acquired frequency usage rights represented significant amount and, as a result, the average Capex for the next 10 years shows declining tendency.

Magyar Telekom's management believes that preparing the value in use (VIU) calculation was unnecessary, since it would have resulted in a lower value than the FVLCD. The VIU method assumes a model without future investments, meaning that additional capex and related revenue and gains to be recognized in the future cannot be considered in the calculations. Assuring the revenue for the long term in a telecom business very much depends on future investments. Due to technological changes it is obvious that these capital expenditures are essentials for long term revenue generation and a necessity for the growth of business.

3.2.2 Investments

Investments in subsidiaries, associates and joint ventures are measured at cost less any accumulated impairment losses. Cost of an investment is the fair value of consideration given, including contingent considerations and transaction costs incurred during the acquisition process.

The Company examines whether an investment may or may not be impaired by using internal and external information.

Magyar Telekom implemented the requirements of the IAS 36 standard as follows:

If the carrying amount of investment exceeds HUF 20 billion then its recoverable amount is always analyzed using a DCF model (irrespective of whether there is any indication of impairment or not).

In 2021, the Company investigated the recoverable amount in the case of T-Systems Magyarország Zrt. and Stonebridge A.D.

Magyar Telekom has a 100% share in Stonebridge A.D and in T-Systems Magyarország Zrt. The Stonebridge A.D. is the owner of the 51 percent of the Makedonski Telekom A.D.'s equity, and its main activity is managing this capital. Accordingly, the Magyar Telekom uses the DCF model of Makedonski Telekom A.D for the estimation of recoverable amount of Stonebridge A.D.

The table below shows the net income and equity of the subsidiaries investigated. The figures on T-Systems Magyarország Zrt. are presented according to Act C of 2000 on Accounting (HAR) while figures on Stonebridge A.D. according to IFRS.

	12.31.2020		12.31.2021	
	Profit after tax (unaudited)	Equity (unaudited)	Profit after tax (unaudited)	Equity (unaudited)
T-Systems Magyarország Zrt.	2,389	36,756	1,738	38,494
Stonebridge A.D.	4,247	1,148	4,555	1,518

In DCF model Magyar Telekom uses weighted average cost of capital (WACC) and estimated perpetual growth rate (PGR). The WACCs are determined based on the capital asset pricing model (CAPM) using the average betas of the peer group, 10 year zero-coupon yields and a debt ratio in line with the usual indebtedness of listed peer telecommunications companies, while the PGRs used are in line with the long-term average growth rate for the particular segment.

The fair value less cost of disposal (FVLCD) of these investments exceeds their carrying amount therefore impairment of these investments did not need to be recognized neither in 2021 nor in 2020. See Note 11 for details of carrying amount of investments.

The table below shows the WACCs and PGRs used in the fair value calculations of these investments conducted in 2020 and 2021.

	T-Systems Magyarország Zrt.		Stonebridge A.D.	
	2020	2021	2020	2021
Perpetual growth rate of CF	0.00%	0.00%	1.00%	1.00%
WACC (post tax incl. local taxes)	8.08%	9.65%	4.75%	4.84%

3.3 Estimated impairment of trade and other receivables

We calculate impairment for accounts receivable based on estimated losses resulting from the inability of our customers to make required payments. The loss allowance is recognized in respect of not only losses already incurred as of the reporting date (incurred losses) but also losses which have not yet been incurred as of the reporting date, but which are expected to be incurred in the future (expected losses). For the largest customers and other telecommunications service providers, impairment is calculated on an individual basis, while for other customers it is estimated on a portfolio basis, for which we base our estimate on the aging of our accounts receivable balance and our historical write-off experience, customer credit-worthiness and recent and expected changes in our customer payment terms and forward-looking information. In addition, we also consider the nature of the business (residential, business, fixed line, mobile, internet, cable TV, etc.) and the environment in which the Company's entities operate in the various markets.

The above factors of impairment calculation are reviewed annually, and changes are made to the calculations when necessary. The assessment of the correlation between historical observed default rates, forecast economic conditions and expected impairment is considered as a critical estimate.

In 2020, coronavirus spread globally, and it has gained significant negative impact both socially and economically. In 2021 the global economic outlook started to improve thanks to the emergence of vaccinations, but the further waves of the pandemic and further economic events evoke uncertainties regarding the recovery. Current changes in market trends and the volatility in the economic conditions in Hungary as the post effect of COVID-19 pandemic has impact on the creditworthiness of our debtors and related estimates may differ materially from the prior periods.

According to the best estimation based on the reassessment of factors (particularly macroeconomic tendencies, current market conditions, the termination of the loan moratorium) significant impact has been concluded on the credit risk of the Company particularly on trade receivables in installment payments for telecommunications equipment sold. Consequently, forward-looking impairment increased by HUF 3.2 billion on this sub-group of debtors. The annual revision also revealed that no other asset classes have been impacted materially. The management concluded there is no reason to modify the bad debt ratios used previously for the portfolios.

A sensitivity analysis had also been prepared that shows how much impairment would have been recognized on trade receivables in instalment payments as at December 31, 2021 if we changed the estimated non-payment rate. According to this, the financial effect of 1% and 2% improvement (-) and deterioration (+) of the applied estimated non-payment rate would increase or decrease by HUF 0.8 billion and by HUF 1.5 billion on the carrying value of these trade receivables (current and non-current part).

If the financial condition of our customers were to deteriorate, actual write-offs of currently existing receivables may be higher than expected and may exceed the level of the impairment losses recognized so far.

The management pays particular attention to the continuous monitoring of the solvency of the customers in the future and would take additional corrective actions if it is necessary. Please see further information Notes 4 and 5.1.2.

3.4 Contracts with customers

The Company applies the guidance to a group of contracts with similar characteristics instead of to a single contract with a customer. The characteristics considered include mainly the business segment of the customer, business model of the contract, and whether the contract is committed or not.

Contract assets are recognized for unbilled amounts typically resulting from sales under long-term contracts when revenue recognized exceeds the amount billed to the customer in that period. This is a temporary difference so that revenue recognized and revenue billed are the same by the end of the commitment term. The amount of the contract assets is determined considering the estimated churn rate of the relevant group of contracts. The time frame for reclassification of contract assets to a receivable is the minimum contract term of the relevant group of contracts.

Furthermore, the Company recognizes assets for costs incurred in connection with the signing of customer contracts which would not have been incurred if the customer contract had not been concluded (contract cost). Capitalization is subject to the expectation that those costs will be recovered by future revenue resulting from the contract.

Costs of obtaining a contract with a customer generally include sales commissions both direct and indirect distribution channels.

Capitalizing incremental costs of obtaining a contract does not only refer to contracts concluded with a new customer but also to contract renewals. Accounting treatment of acquisition- and retention-related contract costs is the same.

Costs of obtaining a contract with a customer are amortized on a portfolio basis over the period that the related goods or services are transferred to the customer which is

- based on historical customer retention data and past experiences in that business segment in the case of uncommitted contracts (e.g. prepaid)
- and in the case of committed contracts the commitment period is considered as amortization period.

The Company decided not to use the practical expedient of expensing the incremental costs of obtaining a contract immediately, which are amortized over a period of one year or less.

See Note 18.4 for the amount of contract assets, contract liabilities and contract costs.

3.5 Annual fees of mobile licenses

Magyar Telekom's primary activities are the fixed-line and mobile operations in Hungary. These services are in most cases regulated by the Hungarian laws or other legislation. These services in most cases require the acquisition of a license or concession, which usually requires a one-off fee and annual payments. It is judgmental whether the management considers the annual fees to be reliably estimable or not. If the management considers that these annual fees can be estimated reliably, the present value of those are capitalized as part of the cost of the license with corresponding current and non-current financial liabilities, otherwise these are recognized as costs in the period they relate to.

The management considered that the annual band fees related to frequency usage right acquired in 2021 can be reliably estimated, the present value of those are recognized as part of the cost of the license. For further information see Notes 4.4.3.1, 10.2, 10.5, 28 and 34.2.

3.6 Leases – Estimating the incremental borrowing rate and assessment of extension and termination options

At the commencement date, a lessee shall measure the lease liability at the present value of the lease payments that are not paid at that date.

The lease payments shall be discounted using the interest rate implicit in the lease, if that rate can be readily determined. If that rate cannot be readily determined, the lessee shall use the lessee's incremental borrowing rate.

This discount rate reflects the main risks of the lease arrangements in a specific country and is provided for each year up to a maturity of 30 years. A change in the interest rate is only applicable when after initial recognition the contract is modified, or a reassessment is necessary which causes a change in the interest rate.

Magyar Telekom uses the lessee's incremental borrowing rate.

Magyar Telekom never uses negative interest rates. Any negative interest rates will be capped at an amount of zero.

In 2021, the range of used discount rates is 2.48%-4.41% (2.87%-5.31% in 2020). It was calculated as the average of the borrowing rates weighted by the discounted lease liability.

The Company has several lease contracts that include extension and termination options. These options are negotiated by management to provide flexibility in managing the leased-asset portfolio and align with the Company's business needs. Management exercises significant judgement in determining whether these extension and termination options are reasonably certain to be exercised.

4 FINANCIAL INSTRUMENTS

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

Financial assets of the Company include cash and cash equivalents, equity instruments of another entity and contractual rights to receive cash (trade receivables) or another financial asset from another entity or to exchange financial assets or financial liabilities with another entity under conditions that are potentially favorable to the entity (derivatives) a contract that will or may be settled in the entity's own equity instruments and is a non-derivative for which the entity is or may be obliged to receive a variable number of the entity's own equity instruments; or a derivative that will or may be settled other than by the exchange of a fixed amount of cash or another financial asset for a fixed number of the entity's own equity instruments. For this purpose, the entity's own equity instruments do not include puttable financial instruments classified as equity instruments, instruments that impose on the entity an obligation to deliver to another party a pro rata share of the net assets of the entity only on liquidation and are classified as equity instruments, or instruments that are contracts for the future receipt or delivery of the entity's own equity instruments.

Financial liabilities of the Company include liabilities that originate from contractual obligations to deliver cash or another financial asset to another entity (non-derivatives); or to exchange financial assets or financial liabilities with another entity under conditions that are potentially unfavorable to the entity (derivatives) or a contract that will or may be settled in the entity's own equity instruments and is a non-derivative for which the entity is or may be obliged to deliver a variable number of the entity's own equity instruments; or a derivative that will or may be settled other than by the exchange of a fixed amount of cash or another financial asset for a fixed number of the entity's own equity instruments. For this purpose, the entity's own equity instruments do not include puttable financial instruments that are classified as equity instruments, instruments that impose on the entity an obligation to deliver to another party a pro rata share of the net assets of the entity only on liquidation and are classified as equity instruments, or instruments that are contracts for the future receipt or delivery of the entity's own equity instruments.

4.1 Financial assets – accounting policies

The Company classifies its financial assets on the basis of both:

- the entity's business model for managing the financial assets and
- the contractual cash flow characteristics of the financial asset

in the following categories:

- at amortized cost if both of the following conditions are met:
 - the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows and
 - the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.
- at fair value through other comprehensive income (FVOCI) if both of the following conditions are met:
 - the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and
 - the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI on the principal amount outstanding.
- at fair value through profit or loss (FVTPL) unless it is classified in the previous categories.

For the purpose of the above classification:

- principal is the fair value of the financial asset at initial recognition
- interest consists of consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs, as well as a profit margin.

Standard purchases and sales of financial assets are recognized on the trade-date, the date on which the Company commits to purchase or sell the asset. Investments are initially recognized at fair value plus transaction costs for all financial assets not carried at fair value through profit or loss. Financial assets carried at fair value through profit or loss are initially recognized at fair value, and transaction costs are expensed in the Profit for the year.

Financial assets are derecognized when the rights to receive cash flows from the investments have expired or have been transferred. Financial assets have been transferred when the contractual rights to receive cash flows of the financial assets have been transferred or the contractual rights to receive cash flows of the financial assets have been retained but there is a contractual obligation to pay the cash flows to one or more recipients in an arrangement compliant with the conditions set out by IFRS 9. Any gains or losses on derecognition are recognized in Profit for the year and are calculated as the difference between (a) the sum of the consideration received and any cumulative gain or loss that had been recognized in other comprehensive income and (b) the carrying amount derecognized.

4.1.1 Impairment of financial assets

Depending on the business model of the Company and the characteristics of the contractual cash flows of the financial assets, financial assets are subsequently measured at amortized cost, at fair value through other comprehensive income or at fair value through profit or loss.

A loss allowance must be recognized for financial assets measured at amortized cost and at fair value through other comprehensive income. The loss allowance must be recognized through profit or loss and reduces the carrying amount of the relevant financial asset; in the case of financial assets measured at fair value through other comprehensive income, the corresponding offsetting entry is recognized in other comprehensive income and does not reduce the carrying amount of the financial asset.

Loss allowances must also be recognized for lease receivables as defined in IFRS 16, contract assets as defined in IFRS 15, financial guarantee contracts and loan commitments relating to loans bearing an off-market interest rate.

Loss allowance was recognized in respect of not only losses already incurred as of the reporting date (incurred losses) but also losses which have not been incurred yet as of the reporting date, but which were expected to be incurred in the future (expected losses).

Based on the changes in credit risk, it must be assessed at each reporting date whether the current loss allowance must be measured at an amount equal to the lifetime expected credit losses or at an amount equal to the 12-month expected credit losses. If it is not possible to assess whether the credit risk has increased significantly based on the individual financial asset, it must be assessed at the portfolio level.

The simplified and the general approaches are to be applied to assess and account for credit losses.

- Simplified approach

All financial instruments underlying simplified approach are measured with lifetime expected credit loss. Therefore, except for insolvency, neither any indicators for increase in credit risk nor any default events are relevant within the simplified approach.

The simplified approach is applicable for trade receivables, contract assets and lease receivables without a significant financial component. The Company has chosen the right to use the simplified approach for these receivables with a significant financial component as well.

- General approach

According to the expected credit loss model the financial instruments are classified into three buckets. The classification into the three buckets is based upon the changes of the credit risk for the financial asset. A relative credit risk model is used for the evaluation of an increased credit risk. The increase of credit risk in comparison to the initial recognition is reflected in the transfer of the financial instrument between the buckets.

According to the expected credit risk model the impairment is determined differently for the three buckets. The impairment for financial instruments in bucket 1 is calculated based upon the 12-month expected credit loss. The impairment for financial instruments in bucket 2 and 3 is calculated based upon the lifetime expected credit losses. Once a long-term asset is moved to bucket 3, the effective interest method has to be applied to reach net value after impairment.

The general approach is applied for bank accounts, factoring receivables, other financial receivables and employee loans.

4.1.2 Financial assets measured at amortized cost

The following items are assigned to this category:

- cash and cash equivalents;
- deposits over three months;
- trade receivables;
- other receivables.

Financial assets at amortized cost are initially recognized at fair value and subsequently carried at amortized cost using the effective interest method (relevant only for the receivables with long-term maturity).

Cash and cash equivalents

Cash and cash equivalents include cash on hand and in banks, and all highly liquid deposits and securities with original maturities of three months or less and exclude all overdrafts.

Trade receivables

If there is a significant increase in the credit risk of trade receivables carried at amortized cost, the amount of the impairment loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows discounted at the receivable's original effective interest rate (i.e. the effective interest rate computed at initial recognition). In the case of short-term trade receivables estimation is made on the amount of expected future cash inflows and compared to the carrying amount, the difference is accounted for as allowance for trade receivables. The carrying amount of the asset is reduced through use of an allowance account. The amount of the loss is recognized as Bad debt expense.

When it is determined that there is no significant increase in the credit risk for an individually assessed accounts receivable, the item should be included in a group of accounts receivables with similar credit risk characteristics and assessed collectively for impairment. Receivables that are individually assessed for impairment and for which an impairment loss is or continues to be recognized are not included in a collective assessment of impairment.

There are three categories for calculating impairment loss of trade receivables:

- for invoices which are overdue
- for invoices which are not yet due
- for unbilled revenue.

In the case of collective assessment there is significant increase in the credit risk if there are overdue items in a group of receivables. An ageing list is prepared on overdue receivables and the amount of impairment is calculated by multiplying impairment rates based on historical loss experience with the amount of receivables.

Impairment rates are calculated based on historical loss experience, however it is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the period on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not exist currently. During the impairment calculation forward-looking information is also considered. Such information can be, for example, internal changes in the billing and dunning processes and external extreme changes e.g. in unemployment rates, credit crisis etc.

When a trade receivable is established to be uncollectible, it is written off against Trade receivables. Impairment and subsequent recoveries of amounts previously written off are accounted for against the period's Direct costs.

4.1.3 Financial assets at fair value through other comprehensive income (FVOCI)

The "financial assets at fair value through other comprehensive income" measurement category includes the following financial assets:

- listed and unlisted equity instruments;
- debt instruments within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets.

Financial assets at fair value through other comprehensive income are initially recognized at fair value and are also subsequently carried at fair value. The unrealized changes in the fair value of financial assets at fair value through other comprehensive income are recognized in equity, in the Revaluation reserve for FVOCI financial assets for both equity instruments and debt instruments.

When securities classified as financial assets at fair value through other comprehensive income are sold, the accumulated fair value adjustments recognized in equity before are recognized in the profit or loss except for equity instruments, where it will be recognized directly to retained earnings.

The Company assesses at each balance sheet date whether there is significant increase in the credit risk. There is significant increase in the credit risk of a financial asset as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event') and that loss event has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be estimated reliably.

If any such evidence exists for FVOCI financial assets, the cumulative loss – measured as the difference between the acquisition cost and the current fair value, less any impairment loss on that financial asset previously recognized in the profit or loss – is removed from equity and recognized in the income statement. Impairment losses recognized in the profit or loss on equity instruments are not reversed through the profit or loss.

4.1.4 Financial assets at fair value through profit or loss (FVTPL)

Debt instruments which do not meet the conditions set out to be initially classified either at amortized cost or at fair value through other comprehensive income must be measured at fair value through profit or loss.

The “financial assets at fair value through profit or loss” measurement category includes the following financial assets:

- Debt instruments that are designated as “at fair value through profit or loss” using the fair value option.
- Equity instruments acquired for the purpose of selling immediately or in the near term and thus classified as “held for trading” and equity instruments not held for trading where the OCI option has not been applied.
- Derivative financial assets.
- Debt instruments not fulfilling conditions of either financial assets at amortized cost or financial assets at fair value through other comprehensive income.

Financial assets at fair value through profit or loss are subsequently carried at fair value. Gains or losses arising from changes in the fair value of the financial assets at fair value through profit or loss category are recognized in the profit or loss in the period in which they arise.

4.2 Financial assets in the statements of financial position

4.2.1 Cash and cash equivalents

Cash and cash equivalents include cash on hand and in banks, and all highly liquid deposits and securities with original maturities of three months or less and exclude all overdrafts. These financial assets are exposed to credit risks, for which see more details in Note 5.1.2. No impairment had to be recognized for any of these balances in the reported years.

Cash and cash equivalents	12.31.2020	12.31.2021
Cash on hand	58	40
Cash in bank (demand deposits)	680	905
Total	738	945

Average interest rates	12.31.2020	12.31.2021
Cash on hand	0.00%	0.00%
Cash in bank (demand deposits)	0.00%	0.00%
Average interest rate	0.00%	0.00%



Cash and cash equivalents by currency	12.31.2020	12.31.2021
EUR	-	-
HUF	738	945
USD	-	-
Total	738	945

4.2.2 Trade receivables

4.2.2.1 Trade receivables – carrying amount

	12.31.2020	12.31.2021
Trade receivables from third parties	111,834	117,122
Trade receivables from subsidiaries	3,092	1,601
Trade receivables from associates and joint ventures.....	1	-
Trade receivables from other related parties	4,040	3,123
Total trade receivables.....	118,967	121,846

Age profile of trade receivables

The following tables show the age profile of the Company's trade receivables by days outstanding (past due). The carrying amounts of receivables are shown net of impairment losses charged as of the financial statement dates.

	12.31.2020	12.31.2021
Not past due	105,984	104,525
Past due by		
less than 30 days	9,908	14,037
30–60 days	1,679	1,845
61–90 days	460	455
91–180 days.....	478	428
181–360 days	336	373
over 360 days	122	183
Carrying amount	118,967	121,846

Vast majority of trade receivables is impaired on a portfolio basis using the simplified approach. Vast majority of past due trade receivables is partly or fully impaired depending mainly on the period of delay of payments.

The Company uses the following rates for impairment:

Overdue	Rate of impairment*
Not due yet	0%-8%
1-30 days	0%-15%
31-60 days	0%-50%
61-90 days	0%-65%
91-180 days	0%-80%
181-360 days	0%-90%
361-720 days	50%-100%
more than 720 days	50%-100%
Customers in state of bankruptcy	100%

*The Company uses different impairment rates for different groups of customers within overdue terms based on the previous years' payment experiments. Considering the basis of impairment the installment receivables from equipment sales is treated as a separate group of customers and the rates of impairment used are generally in the higher sections of the indicated intervals.

4.2.2.2 Impairment losses of trade receivables and contract assets

The table below shows the impairment losses and changes for trade receivables therein for 2020 and 2021.

	2020	2021
Impairment loss, beginning of period	18,143	15,358
Charged to expense – net (included in Direct costs).....	6,540	8,671
Utilized	(a) (9,325)	(6,163)
Impairment loss, end of period	15,358	17,866

The table below shows the impairment losses and changes for contract assets therein for 2020 and 2021.

	2020	2021
Impairment loss, beginning of period	1,200	1,615
Charged to expense – net (included in Direct costs).....	2,069	1,166
Utilized	(a) (1,654)	(1,182)
Impairment loss, end of period	1,615	1,599

(a) Utilized means reversed on derecognition (settlement, write-off or factoring).

See also Note 5.1.2 for further analysis of credit risks related to Trade receivables.

4.2.3 Other financial assets

Other financial assets include receivables due within 12 months (current) and due after 12 months (non-current) from the end of the reporting period (financial statements date). These financial assets are exposed to credit risks, for which see more details in Note 5.1.2. The impairment loss recognized or reversed for other current and non-current financial assets is not material.

4.2.3.1 Other current financial assets

		12.31.2020	12.31.2021
Receivables from asset-related grants	(a)	4,794	3,507
Loans to related parties.....		1,622	1,765
Cashpool receivables.....	(b)	20,419	1,258
Finance lease receivable	(c)	417	443
Derivative financial instruments contracted with related parties	(d)	13,818	300
Other		650	981
Total.....		41,720	8,254

For the explanations of (a)-(d) see Note 4.2.3.2.

4.2.3.2 Other non-current financial assets

		12.31.2020	12.31.2021
Derivative financial instruments contracted with related parties	(d)	6,878	16,415
Finance lease receivable	(c)	5,409	5,028
Borrowings from related parties		2,150	-
Equity instruments.....	(e)	1,193	1,182
Other		752	627
Total.....		16,382	23,252

(a) Starting from 2016 HUF 11.7 billion of EU funds were utilized by Magyar Telekom. The first and second rounds of a tender aimed at the developing digital networks nationwide to cover households in Western and Eastern parts of Hungary with a fixed network capable of reaching speed of at least 30 Mbps. The Company received HUF 8.2 billion grant related to EU fund in advance from which HUF 12 million has not been used yet. The Company accomplished a number of investments which complied with the condition of the related EU Funding Contracts. With respect to these completed investments the amount of the grant which has not been financially settled yet is presented as receivable. For those investments where the conditions have not been satisfied yet, the advances received are shown as part of Other current liabilities (Unused advance payments for asset related grants).

	12.31.2020	12.31.2021
Accumulated grant recognized in PPE.....	11,599	11,683
Accumulated advance payments received (Note 14)	6,826	8,188
Unused advance payments for asset-related grants (Note 14)	21	12
Receivables from asset-related grants.....	4,794	3,507

(b) The following tables show the currency breakdown.

12.31.2020	Carrying amount	Borrower	Currency	Interest rate (%)	Fixed / floating
	14,480	DT AG	HUF	0.50	floating
	5,553	DT AG	EUR	0.00	floating
	(265)	DT AG	USD	0.34	floating
	651	KalászNet Kft.	HUF	1.76	floating
Due within 1 year	20,419				

12.31.2021	Carrying amount	Borrower	Currency	Interest rate (%)	Fixed / floating
	1,258	KalászNet Kft.	HUF	4.35	floating
Due within 1 year	1,258				

(c) See Note 17.2 for more information on Finance lease receivable.

(d) Derivative financial instruments contracted with related parties include the fair value of open currency forwards and cross-currency interest rate swaps (see more details in Notes 4.5.1.1, 5.1.1.1 and 5.1.1.2).

(e) Equity instruments include investment in E2 Hungary Zrt. based on the agreement with MET Holding AG (see Note 11 for more information).

4.2.3.3 Trade receivables over one year

Trade receivables over one year (HUF 16,664 million as at December 31, 2021 and HUF 16,159 million as at December 31, 2020) mainly includes receivables from customers paying over one to two years in installments for telecommunications equipment sold. The impairment on trade receivables over one year was HUF 2,273 million as of December 31, 2021 (HUF 1,378 million in 2020). For further information see Note 3.3.

4.3 Financial liabilities – accounting policies

There are two measurement categories for financial liabilities used by the Company:

- Financial liabilities carried at amortized cost
- Financial liabilities at fair value through profit or loss

No reclassification between categories has been made in the past and no reclassifications are expected in the future. Both types of financial liabilities are initially recognized at fair value, while subsequent measurements are different (see below). A financial liability is derecognized (or a part of a financial liability) from the Statements of financial position when, and only when, it is extinguished – i.e. when the obligation specified in the contract is discharged, cancelled or expired.

4.3.1 Financial liabilities carried at amortized cost

The measurement category for “financial liabilities measured at amortized cost” includes all financial liabilities not classified as “at fair value through profit or loss”.

Loans and other financial liabilities

Loans and other financial liabilities are recognized initially at fair value less transaction costs, and subsequently measured at amortized costs using the effective interest rate method. The effective interest is recognized in the Profit for the year (Interest expense) over the period of the liabilities.

Trade and other payables

Trade and other payables (including accruals) are recognized initially at fair value and subsequently measured at amortized cost using the effective interest method.

Bonds

Bonds are recognized initially at fair value less transaction cost and subsequently measured at amortized cost using the effective interest rate method under IFRS 9.

4.3.2 Financial liabilities at fair value through profit or loss

Derivative financial instruments and call option of MET Holding AG are classified to this category. The Company currently has no intention of measuring non-derivative financial liabilities at fair value.

The Company does not apply hedge accounting, therefore, all derivatives are measured at fair value through profit or loss.

Derivatives are initially recognized at fair value on the date a derivative contract is entered into and their fair values are re-measured at subsequent financial statements dates. The Company does not apply hedge accounting for its financial instruments, therefore all gains and losses are recognized in the Profit for the year (Other finance expense – net).

4.4 Financial liabilities in the statements of financial position

4.4.1 Financial liabilities to related parties

Financial liabilities to related parties include HUF- and EUR-denominated loans taken from Deutsche Telekom International Finance B.V. (DTIF), Deutsche Telekom AG (DT AG) and the Company's subsidiaries and cashpool liabilities. For the whole nominal amount and interest payment of loans denominated in EUR granted by DTIF or DTAG we have cross-currency interest rate swap agreements in place (with DT AG) so that Magyar Telekom's exposure in fact remains in HUF. The loans and the related swap agreements are accounted for and disclosed on a gross basis.

The tables below show the details of the financial liabilities towards related parties as at December 31, 2020 and 2021.

	12.31.2020						Original Term (Year/s)
	Carrying amount	Lender	Currency	Effective interest rate (%)	Fixed / floating	Maturity	
	47,473	DTIF	EUR	1.99	fixed	Jan 2021	9
	48,491	DTIF	EUR	1.60	fixed	July 2021	8
	50	TNM*	HUF	1.16	floating	March 2021	8
	840	Combridge	EUR	1.43	floating	March 2021	9
	50	TNM*	HUF	1.15	floating	March 2021	9
	200	TNM*	HUF	1.50	floating	March 2021	8
	1,626	Investel Zrt.	HUF	1.26	floating	Cashpool	N/A
	(674)	TSM Zrt.	USD	1.29	floating	Cashpool	N/A
	6,362	TSM Zrt.	EUR	1.17	floating	Cashpool	N/A
	2,754	TSM Zrt.	HUF	1.26	floating	Cashpool	N/A
Due within 1 year	107,172						
Accrued interest	2,317						
Other financial liabilities	6						
Derivatives	13						
Total current	109,508						
	43,816	DT AG	EUR	0.41	floating	May 2024	5
	45,641	DT AG	EUR	0.58	floating	Jan 2025	5
Total non-current.....	89,457						

*Telekom New Media Zrt.



	12.31.2021						Original Term (Year/s)
	Carrying amount	Lender	Currency	Effective interest rate (%)	Fixed / floating	Maturity	
	29,520	DT AG	EUR	0.00	floating	July 2022	1
	50	TNM*	HUF	3.15	floating	March 2022	10
	554	Combridge	EUR	0.80	floating	March 2022	9
	295	Combridge	EUR	0.80	floating	March 2022	9
	50	TNM*	HUF	2.57	floating	March 2022	10
	200	TNM*	HUF	3.59	floating	March 2022	10
	1,579	DT AG	USD	0.34	floating	Cashpool	N/A
	5,596	DT AG	HUF	1.98	floating	Cashpool	N/A
	1,158	DT AG	EUR	0.27	floating	Cashpool	N/A
	(4,042)	TSM Zrt.	USD	1.10	floating	Cashpool	N/A
	737	TSM Zrt.	EUR	0.85	floating	Cashpool	N/A
	9,925	TSM Zrt.	HUF	3.95	floating	Cashpool	N/A
	635	Investel Zrt	HUF	3.95	floating	Cashpool	N/A
Due within 1 year	46,257						
Accrued interest	158						
Other financial liabilities	31						
Derivatives	20						
Total current	46,466						
	44,280	DT AG	EUR	0.30	floating	May 2024	5
	46,125	DT AG	EUR	0.52	floating	Jan 2025	5
Total non-current.....	90,405						

*Telekom New Media Zrt.

As at December 31, 2021 current liabilities exceed current assets by HUF 103,066 million, primarily due to frequency fees payable together with the short-term loan facilities received from DT AG that were taken to finance working capital and daily ongoing activities. Management believes that short-term liabilities from DT AG will be refinanced in a similar manner to previous years. Financing needs will also be covered by cash flows generated by operating activities and third-party credit line facilities (see Note 5.1.3).

The table below shows the carrying amounts and fair values of the related-party loans.

	12.31.2020		12.31.2021	
	Book Value	Fair Value	Book Value	Fair Value
HUF denominated loans				
At fixed rate.....	-	-	-	-
At floating rate.....	4,680	4,680	16,456	16,456
	4,680	4,680	16,456	16,456
EUR denominated loans				
At fixed rate.....	95,964	95,964	-	-
At floating rate.....	96,659	96,659	122,669	122,669
	192,623	192,623	122,669	122,669
USD denominated loans				
At fixed rate.....	-	-	-	-
At floating rate.....	(674)	(674)	(2,463)	(2,463)
	(674)	(674)	(2,463)	(2,463)
Accrued interest.....	2,317	2,317	158	158
Other financial liabilities.....	6	6	31	31
Derivatives	13	13	20	20
Total related-party financial liabilities	198,965	198,965	136,871	136,871

The weighted-average interest rate on related-party loans was 0.65% in 2021 (1.17% in 2020). Any decrease in market interest rates will result in an increase in the fair value of the fixed interest rate liabilities.

Borrowings subject to floating interest rates are exposed to cash flow risks. If interest rates rise, it will result in higher cash outflows through interest payments.

Derivatives contracted with related parties include cross-currency interest rate swaps and FX forwards concluded with DT AG to change the Company's exposure to HUF in the case of the EUR-denominated loans and to cover FX needs of expected future foreign currency outflows.

There were no defaults or breaches in connection with the financial liabilities to related parties.

4.4.2 Bonds

In 2020 Magyar Telekom has initiated a review of its external funding framework in order to diversify and enhance the maturity profile of the Company's debt portfolio. Accordingly, the Company participated in the Bond Funding for Growth Scheme ("Scheme" or "BGS") of the Central Bank of Hungary ("MNB") and obtained funding sources with competitive pricing.

In order to increase the liquidity of the corporate bond market, the MNB launched Scheme from July 1, 2019, supplementing its unconventional monetary policy tools and the fixed Growth Loan Program. The proceeds of the bonds are used to fund investments into the fixed and mobile network roll-out and modernization (including the acquisition of new frequencies).

The issued bonds amounted to HUF 70 billion at face value and were purchased for a total purchase price of HUF 70.83 billion by the attendees at the closed auction on November 24, 2020. The total purchase price was transferred to the Company by the attendees on November 26, 2020. Subsequently Magyar Telekom 2027 HUF Bonds were listed on the BSE XBond multilateral trading platform on December 17, 2020 and are available for trading in the XBond platform from December 21, 2020 (first trading day).



The table below shows the main parameters.

Bond code		Magyar Telekom 2027 HUF Bond
Bond expiries	HUF 35 billion	November 26, 2026
	HUF 35 billion	November 26, 2027
Interest type.....	Fixed interest	
Coupon (Nominal interest rate)	1.45%	
Yield.....	1.2579%	
Effective interest rate	1.95%	

At December 31, 2021 the carrying amount of bonds HUF 68,214 million (at December 31, 2020 HUF 67,904 million).

For further information see Notes 4.4.3.3 and 15.

4.4.3 Other financial liabilities

4.4.3.1 Other financial liabilities - Balances

The tables below show the current and non-current balances of Other financial liabilities.

	12.31.2020	12.31.2021
Frequency fees payable..... (a)	4,771	49,759
Debtor overpayment.....	1,309	1,394
Other.....	2,391	831
Total other financial liabilities – current	8,471	51,984

	12.31.2020	12.31.2021
Frequency fees payable..... (a)	71,313	106,323
Other.....	130	144
Total other financial liabilities – non-current.....	71,443	106,467

There were no defaults or breaches in connection with other financial liabilities.

- (a) The present value of the future annual band fees payable is recognized as part of the carrying amount of the licenses as intangible assets, with corresponding current and non-current financial liabilities. New frequency blocks were acquired in January 2021 which entitled Magyar Telekom for the usage of these from April 2022 until March 2042. A one-time spectrum fee amounted to HUF 44.22 billion is required to pay for these frequency blocks, and this payment is due in the first quarter of 2022, the present value of this fee (HUF 44.04 billion) is also disclosed among frequency fees payable. For further information see also Notes 3.5, 10.2, 10.5 and 34.2.



4.4.3.2 Proceeds/repayments of loans and other borrowings

Cash proceeds/payments for related-party loans are included in the Proceeds from loans and other borrowings/Repayment of loans and other borrowings line of the Statements of cash flows.

4.4.3.3 Additional disclosure about changes in liabilities arising from financing activities

The following tables include changes in net debt reconciled with their effects on the Statements of cash flows in order to enable users of financial statements to evaluate changes in liabilities arising from financing activities.

Changes in financial liabilities without cash movement are mainly due to the increase in liability related to annual band fees (see Note 10.2), lease liabilities (see Note 9.2) and the FX effects of financial liabilities denominated mainly in EUR and transactions where future cash flows are recognized at the present value of the annual fees payable.



	Opening Balance at January 1, 2020	Changes in cash and cash equivalents	Changes that effect the cash flows from operating activities	Addition to financial liabilities without cash movement	Changes that effect the cash flows from investing activities	Changes that effect the cash flows from financing activities					Closing Balance at December 31, 2020
						Proceeds from loans and borrowings	Repayments of loans and other borrowings	Proceeds from bonds	Repayments of other financial liabilities	Other	
Related-party loans	209,918	-	(8,316)	25,688	(200)	252,812	(280,950)	-	-	-	198,952
Derivatives from related parties.....	1,890	-	-	850	(2,727)	-	-	-	-	-	13
Frequency fees payable	42,744	-	(3,235)	40,629	-	-	-	-	(4,054)	-	76,084
Lease liabilities	111,297	-	(5,096)	50,994	-	-	-	-	(24,186)	-	133,009
Bonds	-	-	-	(2,930)	-	-	-	70,834	-	-	67,904
Debtors overpayment.....	1,324	-	(15)	-	-	-	-	-	-	-	1,309
Other financial liabilities.....	586	-	668	135	1,132	-	-	-	-	-	2,521
-Less cash and cash equivalents	(925)	187	-	-	-	-	-	-	-	-	(738)
-Less other current financial assets	(13,283)	-	1,365	(20,488)	4,489	(13,803)	-	-	-	-	(41,720)
Net debt	353,551	187	(14,629)	94,878	2,694	239,009	(280,950)	70,834	(28,240)	-	437,334
Treasury share purchase										(5,218)	
Dividend paid										(20,853)	
Net cash used in financing activities.....										(25,418)	



	Opening Balance at January 1, 2021	Changes in cash and cash equivalents	Changes that effect the cash flows from operating activities	Addition to financial liabilities without cash movement	Changes that effect the cash flows from investing activities	Changes that effect the cash flows from financing activities					Closing Balance at December 31, 2021
						Proceeds from loans and borrowings	Repayments of loans and other borrowings	Proceeds from bonds	Repayments of other financial liabilities	Other	
Related-party loans	198,952	-	(5,060)	2,512	(50)	200,754	(260,257)	-	-	-	136,851
Derivatives from related parties.....	13	-	-	741	(734)	-	-	-	-	-	20
Frequency fees payable	76,084	-	(3,464)	88,143	-	-	-	-	(4,681)	-	156,082
Lease liabilities	133,009	-	(4,446)	27,660	-	-	-	-	(21,135)	-	135,088
Bonds	67,904	-	(1,015)	1,325	-	-	-	-	-	-	68,214
Debtors overpayment.....	1,309	-	85	-	-	-	-	-	-	-	1,394
Other financial liabilities.....	2,521	-	(180)	(9)	-	-	-	-	(1,357)	-	975
-Less cash and cash equivalents	(738)	(207)	-	-	-	-	-	-	-	-	(945)
-Less other current financial assets.....	(41,720)	-	(1,705)	1,288	14,722	19,161	-	-	-	-	(8,254)
Net debt	437,334	(207)	(15,785)	121,660	13,938	219,915	(260,257)	-	(27,173)	-	489,425
Treasury share purchase										(10,215)	
Dividend paid										(15,312)	
Net cash used in financing activities.....										(93,042)	

4.4.4 Trade payables

	12.31.2020	12.31.2021
Payable to subsidiaries	8,129	10,332
Payable to other related parties	7,836	9,283
Payable to non-related parties	98,027	99,792
Total	113,992	119,407

4.5 Additional disclosures on financial instruments

4.5.1 Financial assets and liabilities

The Company classifies fair value measurements using a fair value hierarchy that reflects the significance of the inputs used in making the measurements. The fair value hierarchy has the following levels:

- quoted prices (unadjusted) in active markets for identical assets or liabilities (Level 1)
- inputs other than quoted prices included within Level 1 observable for the asset or liability, either directly or indirectly (Level 2)
- inputs for the asset or liability that are not based on observable market data (Level 3)

The level in the fair value hierarchy within which the fair value measurement is categorized in its entirety is determined on the basis of the lowest level input that is significant to the fair value measurement in its entirety. The significance of an input is assessed against the fair value measurement in its entirety.

There was no transfer between Level 1 and Level 2 financial instruments.

Most of the financial assets and most of the financial liabilities are measured at amortized cost, but fair value information is also provided for these. The fair values of these assets and liabilities were determined using Level 3 type information, except for bonds. The initial fair value of the MT2027 bond was calculated based on Level 2 information as the bonds did not have an active market. The discount rate was determined based on relevant BIRS rates and a margin estimation based on commercial bank offers during the auction. The fair value of financial instruments that are not traded on an active market is determined by using valuation techniques, mainly by applying the discounted cash flow method. The cash flow estimations are based on the relevant underlying contracts and the discount rates are calculated based on the interest rate benchmarks applicable for the relevant maturities and currencies (BUBOR, BIRS, EURIBOR, EUR swap yields). Foreign exchange conversion is made based on central bank FX fixings (preferably that of the Central Bank of Hungary).

Level 2 information is available to determine derivatives assets and liabilities. Liabilities on call options (where it is applicable under IFRS 9) are carried at fair value where the fair value was determined using Level 3 type information.

The tables below include the carrying amounts and fair values of the Company's financial assets and liabilities as at December 31, 2021 and 2020.

4.5.1.1 Financial assets – Carrying amounts and fair values

Carrying amounts, fair values and fair value hierarchy of financial assets are the following:

12.31.2020	Carrying amount					Fair value
	Amortized cost	FVOCI (Level 1)	FVTPL (Level 2)	FVTPL (Level 3)	Total	
Cash and cash equivalents	738	-	-	-	738	738
Clearing receivables from related parties	20,419	-	-	-	20,419	20,419
Trade receivables within one year from thirds parties.....	111,835	-	-	-	111,835	111,835
Trade receivables within one year from related parties	7,132	-	-	-	7,132	7,132
Trade receivables over one year.....	16,159	-	-	-	16,159	15,872
Derivative financial instruments contracted with related parties	-	-	20,696	-	20,696	20,696
Loans given to related parties.....	3,772	-	-	-	3,772	3,721
Equity instruments	-	1	-	1,193	1,194	1,194
Finance lease receivable from third parties	577	-	-	-	577	605
Finance lease receivable from related parties	5,249	-	-	-	5,249	7,131
Receivables from asset-related grants...	4,794	-	-	-	4,794	4,794
Other current receivables	651	-	-	-	651	651
Other non-current receivables.....	751	-	-	-	751	773
Total	172,077	1	20,696	1,193	193,967	195,561

12.31.2021	Carrying amount					Fair value
	Amortized cost	FVOCI (Level 1)	FVTPL (Level 2)	FVTPL (Level 3)	Total	
Cash and cash equivalents	945	-	-	-	945	945
Clearing receivables from related parties	1,258	-	-	-	1,258	1,258
Trade receivables within one year from third parties.....	117,122	-	-	-	117,122	117,122
Trade receivables within one year from related parties	4,724	-	-	-	4,724	4,724
Trade receivables over one year.....	16,664	-	-	-	16,664	15,581
Derivative financial instruments contracted with related parties	-	-	16,715	-	16,715	16,715
Loans given to related parties.....	1,765	-	-	-	1,765	1,765
Equity instruments	-	1	-	1,181	1,182	1,182
Finance lease receivable from third parties	476	-	-	-	476	429
Finance lease receivable from related parties	4,994	-	-	-	4,994	5,152
Receivables from asset-related grants.....	3,507	-	-	-	3,507	3,507
Other current receivables	981	-	-	-	981	981
Other non-current receivables.....	627	-	-	-	627	590
Total	153,063	1	16,715	1,181	170,960	169,951

Fair value through profit or loss assets (Level 2) include derivatives, the two classes of which are forward deals (HUF 300 million) and cross currency and interest rate swaps (HUF 16,415 million).

The fair values of those instruments are based on a discounted cash flow method. The calculation is prepared by Magyar Telekom based on money market interest rate curves, basis swap points and spot FX rates from Reuters database published on the last working day of the reporting period. The present value of the expected future cash flows is discounted to the reporting date using money market interest rates and basis swap points in the specific currency from Reuters and exchanged to HUF using the spot FX rate.

The HUF present value of the payable and receivable is accounted for as assets or liabilities.

Fair value through profit or loss financial assets (Level 3) include the investment in E2 Hungary Zrt. in 2020 and 2021.

The carrying values of assets measured at amortized cost with short times to maturity approximate their fair values.

4.5.1.2 Financial liabilities

Carrying amounts, fair values and fair value hierarchy of financial liabilities are the following:

12.31.2020	Carrying amount				Fair value
	Measured at amortized cost	FVTPL (Level 2)	FVTPL (Level 3)	Total	
Financial liabilities to related parties.....	198,952	13	-	198,965	198,965
Trade payables to third parties.....	98,026	-	-	98,026	98,026
Trade payables to related parties	15,965	-	-	15,965	15,965
Frequency fee payable	76,083	-	-	76,083	85,200
Lease liabilities to third parties	124,729	-	-	124,729	133,595
Lease liabilities to related parties.....	8,280	-	-	8,280	8,428
Bonds	67,904	-	-	67,904	68,053
Debtors' overpayment.....	1,309	-	-	1,309	1,309
Other current liabilities.....	2,393	-	-	2,393	2,393
Other non-current liabilities	-	-	130	130	130
Total	593,641	13	130	593,784	612,064

12.31.2021	Carrying amount				Fair value
	Measured at amortized cost	FVTPL (Level 2)	FVTPL (Level 3)	Total	
Financial liabilities to related parties.....	136,851	20	-	136,871	136,871
Trade payables to third parties.....	99,753	-	-	99,753	99,753
Trade payables to related parties	19,653	-	-	19,653	19,653
Frequency fee payable	156,082	-	-	156,082	145,425
Lease liabilities to third parties	126,490	-	-	126,490	125,103
Lease liabilities to related parties.....	8,596	-	-	8,596	7,846
Bonds	68,214	-	-	68,214	58,070
Debtors' overpayment.....	1,394	-	-	1,394	1,394
Other current liabilities.....	831	-	-	831	831
Other non-current liabilities	-	-	144	144	144
Total	617,864	20	144	618,028	595,090

See additional fair value information on financial liabilities in Note 4.4.1.

The carrying values of the current financial liabilities measured at amortized cost approximate their fair values.

4.5.1.3 Financial liabilities carried at fair value determined using Level 3 type information

Financial instruments which are carried at fair value where the fair value was determined using Level 3 type information is the liability pertaining to the call option under IFRS 9. The table below includes the movements of this liability.

	2021
Opening balance at January 1	130
Increase arising on call option.....	-
(Gains) or losses for the period on remeasurement.....	-
- recognized in profit or loss (net financial result).....	14
Closing balance at December 31	144

4.5.2 Items of net gains and losses arising on financial instruments

The tables below include net gains/losses arising on financial instruments in 2020 and 2021.

2020	From Interest	From subsequent measurement			From derecognition	From fee expense	Total net gain / (loss)
		Change in fair value	FX gain/ (loss)	Impairment loss			
FVTPL financial instruments (Level 2).....	-	19,663	-	-	2,441	-	22,104
FVTPL financial instruments (Level 3)..... (a)	-	9	-	-	-	-	9
Financial assets measured at amortized cost.....	296	-	(998)	(8,609)	3	(4,797)	(14,105)
Financial liabilities measured at amortized cost.....	(11,785)	-	(24,577)	-	-	(30)	(36,392)
Equity instruments measured at FVTPL (Level 3)	-	38	-	-	-	-	38
Net gain/(loss) on financial instruments	(11,489)	19,710	(25,575)	(8,609)	2,444	(4,827)	(28,346)

(a) The data for the year 2020 have been supplemented with FVTPL financial instruments (Level 3).

2021	From Interest	From subsequent measurement			From derecognition	From fee expense	Total net gain / (loss)
		Change in fair value	FX gain/ (loss)	Impairment loss			
FVTPL financial instruments (Level 2).....	-	(3,988)	-	-	10,960	-	6,972
FVTPL financial instruments (Level 3).....	-	(13)	-	-	-	-	(13)
Financial assets measured at amortized cost.....	614	-	(698)	(9,837)	-	(4,875)	(14,796)
Financial liabilities measured at amortized cost.....	(13,188)	-	(521)	-	-	(49)	(13,758)
Equity instruments measured at FVTPL (Level 3).....	-	(12)	-	-	-	-	(12)
Net gain/(loss) on financial instruments.....	(12,574)	(4,013)	(1,219)	(9,837)	10,960	(4,924)	(21,607)

The tables above include the amounts before capitalization of borrowing costs (See Note 24).

Impairment losses on financial assets measured at amortized cost includes all expenses incurred or expected to be incurred in relation to the default of our customers and presented as a direct cost in the Statement of profit or loss and other comprehensive income. Before writing off or factoring, we impair the receivables to their recoverable amounts through the use of an impairment allowance account, as a result of which the actual write-off or factoring of these receivables results in no derecognition gains or losses.

The amount of Fee expense is mainly connected to transactional fees on financial realization of income (like white check acceptance fee of Hungarian Post, VPOS relevant cost and other various commissions) and other bank charges type fees.

4.5.3 Offsetting financial assets and financial liabilities

For the financial assets and liabilities subject to enforceable netting arrangements, each agreement between the Company and the counterparty (typically roaming and interconnect partners) allows for net settlement of the relevant trade receivable and payable.

The following trade receivables and trade payables are subject to offsetting agreements and are presented after netting in the Statements of financial position.

	12.31.2020		12.31.2021	
	Trade receivables	Trade payables	Trade receivables	Trade payables
Gross amounts of recognized financial instruments	119,075	114,100	122,038	119,599
Gross amounts of financial instruments set off.....	(108)	(108)	(192)	(192)
Net amounts of recognized financial instruments presented in the statements of financial position	118,967	113,992	121,846	119,407

4.5.4 Other disclosures about financial instruments

Magyar Telekom is also exposed to risks that arise from the possible drawdown of guarantees that in aggregation amounted to a nominal amount of HUF 14.7 billion as at December 31, 2021 (2020: HUF 14.8 billion). In January 2021, Magyar Telekom successfully participated in the auction procedure for the entitlements of frequency use of the 900 MHz and 1800 MHz frequency bands, the precondition of this was the issuance of additional guarantees. The guarantees were issued by banks on behalf of Magyar Telekom as collateral to secure the fulfillment of the Company's certain contractual or tender related obligations. The Company has been doing its best to deliver on its contractual obligations and expects to continue to do so in the future. Even so disputes may emerge from time to time with our partners and sometimes these can result the drawdown of the guarantees. Such utilization of the bank guarantees happened in an amount of HUF 133

million in January 2022 which is not related and has no significant effect on the solvency of the Company. For more information see note 4.4.3.1.

Magyar Telekom does not hold any collateral in which case it is permitted to sell or repledge in the absence of default by the owner of the collateral.

There were no other financial assets or liabilities which were reclassified into another financial instrument category.

The Company does not have compound financial instruments with multiple embedded derivatives.

5 FINANCIAL RISK MANAGEMENT

5.1 Financial risk factors

Magyar Telekom is primarily exposed to credit risks related to its financial assets. In addition, the Company is also exposed to risks from movements in exchange rates interest rates that affect the fair value and/or the cash flows arising from financial assets and liabilities.

Financial risk management aims to limit these risks through ongoing operational and finance activities. Selected derivative and non-derivative hedging instruments are also used for this purpose, depending on the risk assessment. Magyar Telekom only hedges the risks that affect the Company's cash flows, no hedges are concluded to hedge fair values. Derivatives are exclusively used as hedging instruments, i.e., not for trading or other speculative purposes. To reduce the counterparty risk, derivatives are generally only concluded with leading Hungarian or international financial institutions or Deutsche Telekom. Nevertheless, hedge accounting is not applied to such transactions.

The detailed descriptions of risks, the management thereof as well as sensitivity analyses are provided below. These sensitivity analyses calculate with reasonably possible changes in the relevant risk variables and their impact on profit before tax. The impacts disclosed below for the reported periods are subject to an average effective income tax rate of approximately 25%, i.e. the impact on Profit for the year would be approximately 75% of the pre tax amount in a year that is free from significant one-off non-deductible pre-tax impacts and significant changes in tax legislation. The potential impacts disclosed (less tax) would be the same on the Company's Equity.

There were no major changes in these risks compared to the previous reporting period.

5.1.1 Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk:

- foreign currency risk
- interest rate risk
- price risk.

The fundamentals of Magyar Telekom's financing strategy are established each year by the Board of Directors. The Company's policy is to borrow centrally using a balanced combination of medium-term and short-term loans, and fixed and floating interest rates on those liabilities. The Board of Directors has approved two debt protection ratio KPIs, and monitors their fulfillment annually. At the end of 2021 Magyar Telekom Group fulfilled both criteria; Total Debt to EBITDA ratio of 2.15 in 2021 (2020: 2.10), while the allowed maximum can be 2.8 and EBITDA to Net financial result ratio of 17.58 in 2021, (2020: 9.47), while the allowed minimum can be 3.0. The Company during the implementation of the finance policy and ongoing financial risk management, determine and continuously monitor the foreign exchange, liquidity and counterparty risk management guidelines.

Magyar Telekom is exposed to interest and foreign exchange (FX) rate risk associated with its interest bearing assets and liabilities and anticipated transactions. The functional currency of Magyar Telekom is HUF, consequently, Magyar Telekom's objective is to minimize the level of its financial risk applying HUF terms.

For the presentation of market risks, sensitivity analyses are also provided that show the effects of hypothetical changes of relevant risk variables on Profit before tax and Equity. These hypothetical changes were modeled to present a reasonably possible change in the relevant risk variables. The periodic effects are determined by relating the hypothetical

changes in the risk variables to the balance of financial instruments at the end of the latest reporting period (2021) and the preceding reporting period (2020). The balances at the end of the reporting period are usually representative for the year as a whole; therefore, the impacts are calculated using the year end balances. The methods and assumptions used in the sensitivity calculations did not change significantly compared to the previous period. As a result of the still rather volatile international capital and securities markets, higher fluctuations of the FX and interest rates are also possible.

5.1.1.1 Foreign currency risk

Foreign currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in FX rates. Currency risks arise on financial instruments denominated in currencies other than the functional currency of the Company. Relevant risk variables are generally all non-functional currencies in which Magyar Telekom has financial instruments.

The Hungarian Forint depreciated by approx. 1% against the euro in 2021. In 2019 and 2020 the forint was fluctuating in a 8-12% range against the EUR, in 2021 this range narrowed slightly to approx. 7%.

In order to mitigate FX risk in the case of FX denominated financial instruments, Magyar Telekom minimized its foreign currency borrowings in the past years or covered them with derivative instruments to substantially reduce FX risk. The corporate bond is HUF denominated and thus no foreign currency exposure arises related to this instrument.

FX risks arising on loans and related swaps with DT AG

Several related-party loans taken to finance general corporate needs from Deutsche Telekom AG (DT AG) and the financing vehicle of Deutsche Telekom, Deutsche Telekom International Finance B.V. (DTIF) are denominated in EUR, while, at the same time, cross-currency interest rate swaps are concluded with Deutsche Telekom AG to fix the actual cash flows of Magyar Telekom in HUF. Even though the Company does not apply hedge accounting, the change in the HUF/EUR exchange rate has limited (net) impact on profit or loss and equity related to the hedged loans and the swaps together.

Sensitivity analysis

A reasonably possible strengthening or weakening of the EUR in the table below against HUF as at December 31 would have affected the measurement of loans denominated in a foreign currency and increased (+)/ decreased (-) equity and profit or loss by the amounts shown below. This analysis assumes that all other variables, in particular interest rates, remain constant and ignores any impact of forecast sales and purchases. As the profit or loss effect would be the same as the equity effect, only the former is disclosed.

	Profit or loss	
	Strengthening	Weakening
12.31.2020		
EUR/HUF (15% movement)		
Loan	(27,813)	27,813
Swap agreements	28,747	(28,747)
Net effect	934	(934)
12.31.2021		
EUR/HUF (10% movement)		
Loan	(11,993)	11,993
Swap agreements	12,242	(12,242)
Net effect	249	(249)

Other FX exposure

The Company's remaining FX exposure is mostly related to (i) cash balances held by the Company in foreign currency, and (ii) operating activities through revenue from, and payments to, international telecommunications operators as well as (iii) capital and operating expenditure contracted with vendors in foreign currency. In line with currency hedging policy, the Company holds sufficient amounts of foreign currencies on its bank accounts or buys foreign currencies through FX

forward transactions, the amounts of which are determined considering the balance of short-term FX denominated trade and leases payables and trade receivables in the next period in order to hedge the currency risk arising in connection with those assets and liabilities. The Company's foreign currency (EUR and USD) denominated liabilities (other than the above described loans) exceed the Company's foreign currency (EUR and USD) denominated assets, therefore changes in the functional currencies' exchange rates would have impact on the profit of the Company.

In order to reduce the above exposure, Magyar Telekom occasionally enters into derivative contracts. The positive fair value of the open short-term forward positions was HUF 0.2 billion (asset) as of December 31, 2021 (2020: HUF 0.5 billion asset). These positions were opened to mitigate the FX risks of future FX payments exceeding FX income.

Sensitivity analysis

A reasonably possible strengthening or weakening of the currencies in the table below against HUF as at December 31 would have affected the measurement of financial instruments denominated in a foreign currency and increased (+)/decreased (-) equity and profit or loss by the amounts shown below. This analysis assumes that all other variables, in particular interest rates, remain constant and ignores any impact of forecast sales and purchases. As the profit or loss effect would be the same as the equity effect, only the former is disclosed.

	Profit or loss	
	Strengthening	Weakening
12.31.2020		
EUR/HUF (15% movement)		
Net balance of FX trade payables, trade and financial receivables plus bank deposits.....	(5,089)	5,089
Connected forward deals.....	3,173	(3,173)
Net effect.....	(1,916)	1,916
USD/HUF (15% movement)		
Net balance of FX trade payables, trade and financial receivables plus bank deposits.....	(65)	65
Connected forward deals.....	1,978	(1,978)
Net effect.....	1,913	(1,913)
12.31.2021		
EUR/HUF (10% movement)		
Net balance of FX trade payables, trade and financial receivables plus bank deposits.....	(4,004)	4,004
Connected forward deals.....	4,356	(4,356)
Net effect.....	352	(352)
USD/HUF (15% movement)		
Net balance of FX trade payables, trade and financial receivables plus bank deposits.....	(440)	440
Connected forward deals.....	722	(722)
Net effect.....	282	(282)

As a result of the volatile international capital and securities markets, even a more than 10% fluctuation of the functional currency HUF against EUR and a more than 15% against USD is possible as extraordinary market conditions may cause extreme volatility on FX markets.

5.1.1.2 Interest rate risk

Magyar Telekom is also exposed to interest rate fluctuations. This is due to the fact that changing interest rates affect the fair value of the fixed-rate instruments and also affect the cash flows through the floating rate instruments.

Changes in the market interest rates of non-derivative financial instruments with fixed interest rates does not affect Profit for the year because none of them are measured at fair value through profit or loss. On the other hand, all financial instruments with fixed interest rates (which are carried at amortized cost) are not subject to cash flow interest rate risk.

Changes in the market interest rate of interest rate derivatives (interest rate swaps, cross-currency swaps) that are not part of a hedging relationship as set out in IFRS 9 affect Other finance expense - net (net gain/loss from re-measurement of the financial assets to fair value).

Changes in market interest rates affect the interest income or expense of non-derivative floating-interest financial instruments for which no cash flow hedges are in place.

Financial assets

Excess cash of the Company's Hungarian operations is primarily used to repay loans, so it has no significant bank deposits.

Financial liabilities

Financial liabilities exposed to interest rate risk are primarily the related-party (DTIF, DT AG) and the related swap agreements in place. These loans are almost exclusively taken by the Company as the financing of the Company is managed centrally. The analysis below describes the Company's net exposure to the net interest rate risks related to the loans and the related swap agreements.

As the vast majority of the debt portfolio is denominated in HUF, or swap agreements are in place so that the loans payable are exposed to changes in HUF interest rates, the Company is mostly exposed to the HUF interest rate fluctuations for its financial liabilities. To control this interest rate risk, a combination of fixed and floating rate debt is used. Fixed interest-bearing debts (including loans swapped to fixed interest and excluding loans swapped to floating interest) made up 76% of the Company's total debt as of December 31, 2021 (2020: 95%).

Cash flow sensitivity analysis for variable rate instruments

Floating interest-bearing debts (including loans swapped to floating interest and excluding loans swapped to fixed interest) made up 24% of the Company's total debt as of December 31, 2021 (2020: 5%).

A reasonably possible change of 300 basis points in interest rates at the reporting date would have increased (decreased) equity and profit or loss by the amounts shown below. This analysis assumes that all other variables, in particular foreign currency exchange rates, remain constant. As the profit or loss effect would be the same as the equity effect, only the former is disclosed.

	Profit or loss	
	300 bp increase	300 bp decrease
12.31.2020		
Floating rate instrument.....	(3,048)	3,048
Interest rate swap.....	2,684	(2,684)
Cash flow sensitivity (net)	(364)	364
12.31.2021		
Floating rate instrument.....	(4,221)	4,221
Interest rate swap.....	2,712	(2,712)
Cash flow sensitivity (net)	(1,509)	1,509

5.1.2 Credit risk

Credit risk is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation.

The maximum exposure to credit risk as at the end of the reporting period are represented by the carrying amounts of the financial assets in the Statements of financial position. Guarantee agreements reducing the maximum exposure to credit risk as at the end of the reporting period are described later in this section.

The vast majority of credit risks may arise in respect of Cash and cash equivalents, Bank deposits with original maturities over three months and Trade receivables, most of which have short-term maturities.

In line with the Company's risk management policy, Magyar Telekom deposits the vast majority of excess cash in banks rated at least BBB+ (or equivalent) or make efforts to get guarantees for these fixed-term deposits from banks rated at least BBB+. We, however, also have current accounts in banks with lower ratings than this. Moreover, Magyar Telekom prefers to deposit in banks that grant loans to Magyar Telekom to make the compensation of deposits and loans possible in case the bank defaults.

In the case of Cash and cash equivalents and Bank deposits with maturities over 3 months, credit risk is limited, as Magyar Telekom places its cash in Hungary with substantial credit institutions. Further, excess HUF cash is also used for repayment of the HUF-denominated loans and borrowings or is deposited at partner banks which grant loans to Magyar Telekom, therefore, the credit risk related to cash held in HUF is very limited.

Concentrations of credit risk relating to trade receivables are limited due to the large number of customers comprising the Company's customer base and their dispersion across many different geographic areas and industries.

The annual bad debt expense of the Company in 2021 was 1.8% (2020: 1.6%) of revenue. For further information see Note 3.3.

There are varying credit checking practices applied as described below.

Credit checking at the time of the service request is carried out automatically by the credit checking application. A variety of checks including checking the bankruptcy list, the internal database of risky installation locations, the collection history of the past six months, the outstanding debt and the joint database of debtors of the Hungarian mobile operators are performed depending on the service to be used. The Fraud Detecting System monitors extreme usage and fraudulent behavior of customers for mobile, fixed-line and Internet services. In the case of business customers, account managers check if the customer has outstanding debts.

Dunning procedures are run automatically by the billing systems and include various reminder tools like SMS, reminder message via Telekom APP, telephone calls, reminder letters, restricted service, termination letters and disconnections. In the case of medium and large enterprises the dunning process starts manually (first reminder letter). After the first step, this process is also automated. Based on the effective laws and regulations and over a minimum overdue amount the Company applies varying and customized reminder procedures with specific deadlines to the different customer groups. After the termination of the contract and depending on the expected success of the process, we combine the different collection steps of involving external partners, selling the outstanding debt or initiating legal proceedings. All parts of the process are regulated by internal directives.

5.1.3 Liquidity risk

Liquidity risk is the risk that an entity may encounter difficulty in meeting obligations associated with financial liabilities.

Prudent liquidity risk management implies maintaining sufficient Cash and cash equivalents and Bank deposits as well as available funding through an adequate amount of committed credit lines. The Company's finance management aims to maintain flexibility in funding by keeping committed credit lines available. The undrawn bank credit lines amounted to HUF 43.5 billion as at December 31, 2021 (2020: HUF 41.1 billion).

The following two tables summarize the maturity structure of Magyar Telekom's financial liabilities including the interest payable on those liabilities (undiscounted amounts) as of December 31, 2021 and 2020. As the majority of the financial liabilities are paid from the cash generated from ongoing operations, the maturity analysis of the financial assets as at the end of the reporting periods (in comparison with the financial liabilities) would not be useful, therefore, is not included in the following tables.

	12.31.2020			
	Total	within 1 year	1 to 5 years	after 5 years
Trade payables to third parties.....	98,027	98,027	-	-
Trade payables to related parties	15,965	15,965	-	-
Financial liabilities to related parties.....	202,031	111,273	90,758	-
Lease liabilities to third parties.....	153,438	23,900	68,362	61,176
Lease liabilities to related parties	9,115	1,964	7,149	2
Bonds	74,502	1,015	4,060	69,427
Frequency fees payables	106,631	8,145	26,704	71,782
Other financial liabilities.....	3,831	3,701	130	-
Total cash outflows.....	663,540	263,990	197,163	202,387
Open swap positions' cash flows				
Gross cash inflow in EUR million.....	520	271	249	-
Gross cash inflow in HUF million (at spot rate).....	189,618	98,820	90,798	-
Gross cash outflow in HUF million.....	174,480	87,505	86,975	-
Net cash inflow in HUF million.....	15,138	11,315	3,823	-
Open forward positions' cash flows				
Gross cash inflow in EUR million.....	58	58	-	-
Gross cash inflow in USD million	44	44	-	-
Total gross cash inflow in HUF million (at spot rate)	34,261	34,261	-	-
Gross cash outflow in HUF million.....	33,851	33,851	-	-
Net cash inflow in HUF million.....	410	410	-	-

	12.31.2021			
	Total	within 1 year	1 to 5 years	after 5 years
Trade payables to third parties.....	99,753	99,753	-	-
Trade payables to related parties	19,653	19,653	-	-
Financial liabilities to related parties.....	138,807	46,699	92,108	-
Lease liabilities to third parties.....	151,546	24,852	66,595	60,099
Lease liabilities to related parties	9,193	1,497	7,678	18
Bonds	73,797	1,015	38,167	34,615
Frequency fees payables	199,103	54,447	35,885	108,771
Other financial liabilities.....	2,273	2,129	144	-
Total cash outflows.....	694,125	250,045	240,577	203,503
Open swap positions' cash flows				
Gross cash inflow in EUR million.....	251	1	250	-
Gross cash inflow in HUF million (at spot rate).....	92,619	369	92,250	-
Gross cash outflow in HUF million.....	86,974	1,910	85,064	-
Net cash inflow / (outflow) in HUF million.....	5,645	(1,541)	7,186	-
Open forward positions' cash flows				
Gross cash inflow in EUR million.....	198	198	-	-
Gross cash inflow in USD million	15	15	-	-
Total gross cash inflow in HUF million (at spot rate)	77,948	77,948	-	-
Gross cash outflow in HUF million.....	78,542	78,542	-	-
Net cash inflow / (outflow) in HUF million.....	(594)	(594)	-	-

The average maturity of Magyar Telekom's debt portfolio was 3.07 years as at December 31, 2021 (2020: 3.14 years). The floating interest payments arising from the financial instruments were calculated using the last interest rates fixed before December 31, 2021 and 2020. Actual cash flows may be different if the floating interest rate changes in future periods. For further information see Note 4.4.1.

5.2 Capital management

The Company's objectives when managing capital are to safeguard the Company's ability to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders and to maintain an optimum capital structure to reduce the cost of capital.

The Company's management proposes to the owners (through the Board) of the Company to approve dividend payments or adopt other changes in the Company's equity capital in order to optimize the capital structure of the Company. This can be achieved primarily by adjusting the amount of dividends paid to shareholders, or alternatively, by returning capital to shareholders by capital reductions, selling or buying own shares.

In 2021 the Board of Directors of Magyar Telekom approved HUF 15,311 million dividend (HUF 20,855 million dividend in 2020), and the Company's Board recommends to declare a HUF 15,000 million dividend at the April 2022 Annual General Meeting.

In addition to the above, according to the Hungarian Civil Code (2013. V.), Magyar Telekom has to ensure that the Company's Equity in the Separate Financial Statements does not fall below two thirds of its Common stock, i.e. the total of the reserves should not be negative. The Company is in compliance with this regulation.

The equity capital, which the Company manages, amounted to HUF 636 billion on December 31, 2021 (2020: HUF 607 billion), see Note 16.

6 INCOME TAXES

6.1 Income taxes – accounting policies

Income tax expense comprises current and deferred tax. It is recognized in Profit or loss except to the extent that it relates to a business combination, or items recognized directly in equity or in other comprehensive income.

6.1.1 Current taxes

Current tax comprises the expected tax payable or receivable on the taxable income or loss for the year and any adjustment to the tax payable or receivable in respect of previous years. The amount of current tax payable or receivable is the best estimate of the tax amount expected to be paid or received that reflects uncertainty related to income taxes, if any. It is measured using tax rates enacted or substantively enacted at the reporting date. Current tax also includes any tax arising from dividends. Current tax assets and liabilities are offset only if certain criteria are met.

Income taxes are comprised of corporate income taxes and other income taxes.

6.1.1.1 Corporate income taxes

Corporate income taxes are payable to the central tax authorities. The basis of the tax is the taxable entities' accounting profit adjusted for non-deductible and non-taxable items. The withholding tax relating to the dividend received is also reported in corporate income taxes. From January 1, 2017 a flat corporate income tax rate of 9% has been enacted.

As Magyar Telekom is listed on the Budapest Stock Exchange, it was obliged to adopt IFRSs in its statutory financial statements from 2017 in accordance with the Act C of 2000 on Accounting (HAR).

6.1.1.2 Other income taxes

Other income taxes include certain local and central taxes levied in Hungary on the companies' net margins, usually determined at a substantially higher level than the corporate tax base but applying a significantly lower tax rate. Other income taxes include local business tax and innovation fee.

6.1.2 Deferred taxes

Deferred tax is recognized on temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and amounts used for taxation purposes.

Deferred tax is not recognized

- if it arises from the initial recognition of an asset or liability in a transaction (other than a business combination) that at the time of the transaction affects neither accounting nor taxable profit,
- if it arises from the initial recognition of goodwill.

Deferred tax assets are recognized to the extent that it is probable that future taxable profit (or reversing deferred tax liabilities) will be available against which the temporary differences can be utilized. Deferred tax assets, which are not recognized, should be re-evaluated as of the financial statements date and recognized to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilized.

Deferred tax assets are recognized for temporary differences relating to the subsidiaries and investments to the extent that it is probable that the temporary difference will reverse in the near future, and a future taxable profit will be available against which the temporary difference can be utilized.

Deferred tax liabilities are recognized for all taxable temporary differences relating to the subsidiaries and investment, except for the case that the Company controls the timing of the reverse of these temporary differences, and it is likely that the relevant temporary differences will not reverse in the near future.

Deferred tax is measured at the tax rates that are expected to apply to temporary differences when they reverse using income tax rates enacted or substantively enacted at the reporting date.

In the Company's statements of financial position, deferred tax assets and liabilities are offset and disclosed as deferred tax asset or deferred tax liability based on their net balance.

6.2 Income taxes in the Statements of profit or loss and other comprehensive income

The table below shows the income tax expenses charged in the Profit for the year.

Income tax expense	12.31.2020	12.31.2021
Corporate income tax	1,211	2,032
Other income taxes	8,336	8,570
Deferred tax expense	2,680	3,266
Total	12,227	13,868

6.2.1 Tax expense reconciliation

The reconciliation between the reported income tax expense and the theoretical amount arising from applying the statutory income tax rates is as follows:

	12.31.2020	12.31.2021
Profit before income tax.....	53,779	68,412
Calculated amount of tax 9%	(4,840)	(6,157)
Tax shield of items not subject to income tax..... (a)	863	640
Tax impact of non deductible items	(679)	(561)
Other income taxes	(8,336)	(8,570)
Impact of tax deductibility of other income taxes	750	771
Investment tax credit accretion..... (e)	15	9
Income tax expense	(12,227)	(13,868)
Effective tax rate.....	22.74%	20.27%

For explanations (a)-(e) see as follows.

- (a) This line of the reconciliation primarily includes the tax shield impact of expenses, which are not included in the profit before tax, but deductible when determining the separate corporate income tax base. These items include the depreciation of assets (or additional values of assets) which are not included in the assets of the statements of financial position, and which are not considered in the deferred tax calculation.
- (b) This line of the reconciliation includes the negative tax impact of the expenses included in the profit and loss, but non deductible when determining the corporate income tax base. These items primarily include the non deductible receivable impairment and write-downs and penalties.
- (c) Other income taxes include certain local and central taxes levied in Hungary. Other income taxes include the local business tax and the innovation tax, levied in Hungary on the companies' net margins, determined usually at a substantially higher level than the corporate tax base, but with substantially lower tax rates (max 2%). As the first line of the reconciliation calculates theoretical tax expense calculated using the corporate tax rate, the Hungarian local business tax and the innovation fee impose additional income tax expenses on the Company, included in this line of the reconciliation.
- (d) The Hungarian local business tax and innovation fee are deductible expenses for corporate tax purposes, the positive tax impact of which is included in this line of the reconciliation.
- (e) Investment tax credit accretion includes the increase of the net present value of the investment tax credit deriving from the utilization of the tax credits in periods subsequent to the year of recognition. For further information see Note 6.3.2.1.

6.3 Income taxes in the Statements of financial position

6.3.1 Current taxes in the Statements of financial position

Current tax assets and liabilities in the Statements of financial position represent the amount of corporate and other income taxes receivable from, and payable to the Hungarian tax authorities.

6.3.2 Deferred taxes in the Statements of financial position

Magyar Telekom's deferred tax balances are as follows:

	Balance at December 31, 2019	Effect on profit	Other movements	Balance at December 31, 2020	Effect on profit	Other movements	Balance at December 31, 2021
Deferred tax assets and (liabilities)							
Investment tax credits (Note 6.3.2.1)	858	(3,108)	2,752	502	(4,258)	4,642	886
Impairment of receivables and inventory	1,360	(217)	-	1,143	173	-	1,316
PPE and intangible assets	(6,857)	552	-	(6,305)	575	-	(5,730)
Goodwill.....	(14,481)	-	-	(14,481)	-	-	(14,481)
Provisions for liabilities and charges.....	1,353	93	-	1,446	245	-	1,691
Total net deferred tax	(17,767)	(2,680)	2,752	(17,695)	(3,265)	4,642	(16,318)
Of which deferred tax liabilities	(21,338)			(20,786)			(20,211)
Of which deferred tax assets.....	3,571			3,091			3,893

The Other movements column includes the increase in investment tax credit improves energy efficiency recognized in 2021 and 2020.

Deferred tax assets arising from investment tax credits are recognized against the capitalized cost of the related asset acquisition.

Temporary differences associated with investments in subsidiaries for which deferred tax liabilities or assets have not been recognized amounted to a net liability of HUF 20,799 million at December 31, 2021 (HUF 20,799 million was the temporary difference not recognized at December 31, 2020).

Deferred tax liability on goodwill is related to the goodwill arising from the acquisition of subsidiaries (Emitel Zrt. and T-Mobile) in the Company's Separate Financial Statements, which had merged into Magyar Telekom. The amortization of goodwill is a tax deductible expense in corporate income tax, while under IFRSs there is no amortization accounted in the books. The difference deriving from the two types of accounting is represented by the deferred tax liability.

6.3.2.1 Investment tax credits

In 2020 and 2021 Magyar Telekom accomplished a new tax credit program in order to increase energy effectiveness. In order to utilize these tax credits, the Company had to meet certain audit requirements set out in the relevant tax regulations and independent external auditors stated that the investments fulfill the criteria of energy effectiveness. The investment tax credit is booked as a decrease from the investment costs of the assets, as well as a deferred tax asset of the whole tax credit amount is booked accordingly. The Company utilizes HUF 4,267 million tax credit in the 2021 corporate tax return, while the remaining HUF 886 million tax credit remains as deferred tax asset in the Company's books. The Company expects that the tax credit carried forward can be utilized in the 2022 corporate tax return.

The following table shows the details of the energy saving investment tax credits as of December 31, 2020:

Earned in year	Amount of qualifying investment	Amount of tax credit earned	Accretion recognized in tax expense	Tax credit utilized	Tax credit carried forward 12.31.2020	Expires in year
2020	7,650	2,752	-	(2,250)	502	2025

The following table shows the details of the energy saving investment tax credits as of December 31, 2021:

Earned in year	Amount of qualifying investment	Amount of tax credit earned	Accretion recognized in tax expense	Tax credit utilized	Tax credit carried forward 12.31.2021	Expires in year
2020	7,650	2,752	9	(2,761)	-	2025
2021	12,614	4,642	-	(3,756)	886	2026
Total	20,264	7,394	9	(6,517)	886	

In order to utilize the tax credits and certain tax deductibility opportunities earned by the Company, they had to comply with strict requirements as set out in the relevant tax regulations. The Company fulfilled all requirements connecting energy effective investment programs.

In 2020 Magyar Telekom utilized investment tax credit in the amount of HUF 858 million relevant to the “large investment tax credit programs” commenced in 2013.

6.4 Income taxes in the Statements of Cash Flows

The company identifies its tax settlement of energy saving investment tax credit as an investing activity in the Statements of Cash Flows.

The table below shows how the total cash flows from income tax are allocated over the activities:

Activities in the Statements of Cash Flows	Tax paid
Cash flows from operating activities (presented on the line income tax paid).....	(11,724)
Cash flows from investing activities (investment tax credit utilized in 2021).....	2,249
Cash flows from financing activities.....	-
Total cash flows from income tax	(9,475)

Magyar Telekom made investments concerning energy saving for the first time in 2020, based on this the payment of the reduced income tax was settled in 2021.

6.5 Tax reviews

The tax authorities may at any time inspect the books and records within five years from the end of the year when tax declarations were submitted and may impose additional tax assessments with penalties and penalty interest. Management is not aware of any circumstances which may give rise to a potential material liability in this respect.

6.6 Dividends paid by Magyar Telekom

The dividends paid and payable by Magyar Telekom to its owners may be subject to withholding or income taxes of the owners, which do not have any impact on the amount of the dividend declared or on the Company’s tax expense as these taxes – if any – are levied on the owners.

7 INVENTORIES

7.1 Inventories – Accounting policies

Inventories are stated at the lower of cost or net realizable value using the historical cost method of accounting and are valued on a weighted average basis. The cost of inventories comprises all costs of purchase, cost of construction and other costs incurred in bringing the inventories to their present location and condition. Net realizable value is the estimated selling price in the ordinary course of business less the estimated costs of completion and the estimated costs necessary to make the sale.

Impairment losses on Inventories are recognized in Other operating expenses.

7.2 Inventories in the statements of financial position

	12.31.2020	12.31.2021
Inventory for resale	12,109	12,620
Other inventory	537	596
Subtotal	12,646	13,216
Impairment.....	(3)	(2)
Total	12,643	13,214

The Company has no inventory pledged as security as at December 31, 2020 or December 31, 2021.

Impairment and its reversal are not significant, so no impairment movement table is presented.

8 ASSETS AND LIABILITIES HELD FOR SALE

8.1 Assets and liabilities held for sale – Accounting policies

An asset (typically properties and closely related other assets) is classified as held for sale if it is no longer needed for the future operations of the Company, and has been designated for sale, which is highly likely to take place within 12 months, and the asset is available for immediate sale in its present condition, subject only to terms that are usual and customary for sales of such assets. These assets are measured at the lower of their carrying amount and fair value less cost of disposal. Depreciation is discontinued from the date of designation to the held-for-sale status. When an item of PPE or intangible assets is designated for sale, and the fair value less cost of disposal is determined to be lower than the carrying amount, the difference is recognized in the Profit for the year (Depreciation and amortization) as an impairment loss.

8.2 Assets held for sale in the statement of financial position

The assets and liabilities classified as held for sale are disclosed below.

	12.31.2020	12.31.2021
Property, plant and equipment.....	489	115
Total assets held for sale	489	115

Assets held for sale include primarily land and buildings that have been determined to be sold within 12 months, as a result of the continuing improvement of utilization of properties.

9 PROPERTY, PLANT AND EQUIPMENT (PPE)

9.1 PPE – Accounting policies

Property, plant and equipment are measured at historical cost less accumulated depreciation and any accumulated impairment losses.

The cost of an item of PPE comprises its purchase price, including import duties and non-refundable purchase taxes, after deducting trade discounts and rebates, any costs directly attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. The initial estimate of the costs of dismantling and removing the item and restoring the site on which it is located is also included in the costs if the obligation incurred is recognized as a provision (see Note 13).

Government grants relating to the purchase of PPE are deducted from the original cost of the items and are recognized in the Profit for the year through the reduced amount of depreciation of the related assets over their useful lives. Investment tax credits relating to qualifying investment projects (Note 6.3.2.1) are also recognized in this manner.

Cost, in the case of telecommunications equipment, comprises all expenditures including the cabling within customers' premises and borrowing costs of related loans and corporate bonds.

Subsequent expenditure on an asset is capitalized if it is probable that the future economic benefits associated with the expenditure will flow to the Company. Maintenance and repairs are recognized as an expense in the Profit for the year when incurred.

When assets are scrapped, the cost and accumulated depreciation are removed from the accounts and the loss is recognized in the Profit for the year (Depreciation and amortization).

When assets are sold, the cost and accumulated depreciation are removed from the accounts and any related gain or loss is recognized in the Profit for the year (Other operating income/expense).

Depreciation is calculated on a straight-line basis from the time the assets are deployed and charged over their economic useful lives. On an annual basis, Magyar Telekom reviews the useful lives and residual values for consistency with current development plans and advances in technology. For further details on the groups of assets impacted by the most recent useful life revisions refer to Note 9.3. The annual revisions are conducted in the second quarter of the year and the resulting changes are applied from the third quarter of the year. In addition to the regular revisions, any investment decisions made throughout the year may also result in a change of useful life of a group of assets in any period of the year.

The estimated useful lives assigned to different classes of property, plant and equipment are as follows:

	Years
Buildings	5-50
Duct, cable and plant	3-38
Other telecommunications equipment	2-25
Other equipment.....	2-50

Useful lives of property, plant and equipment in operation may increase if the asset is refurbished. Useful life change is not automatic, only if it is significantly increased as a result of the investment, which is based on well-founded technical experts' decision performed on individual basis.

Assets that are subject to amortization or depreciation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of the assets' fair value less cost of disposal and its value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units – CGUs).



The fair values of the individual items of property, plant and equipment of the Company in most cases cannot be determined, as individual assets do not generate cash flows. Therefore, the Company determines the impairment of separate assets on CGU level. From this point of view, the whole Company is considered as one CGU. The Company determines fair values at CGU level, primarily by using discounted cash flow analyses. For further information see Note 3.2.

The impairment losses of PPE assets are accounted for in the Depreciation and amortization line of the Statements of profit or loss and other comprehensive income.

9.2 PPE in the statements of financial position

	Land and buildings (a)	Telecom equipment	Other equipment	Total
01.01.2020				
Gross value.....	98,211	879,775	73,187	1,051,173
Accumulated depreciation	(43,742)	(602,480)	(60,591)	(706,813)
Carrying amount	54,469	277,295	12,596	344,360
Of which held for sale				(656)
				343,704
Carrying amount - 01.01.2020	54,469	277,295	12,596	344,360
Investments	1,160	69,045	2,517	72,722
Changes due to revisions of asset, retirement obligations.....	127	-	-	127
Disposals	(4,797)	(337)	(222)	(5,356)
Depreciation charge.....	(2,940)	(53,158)	(5,125)	(61,223)
Reclassifications	629	(2,146)	1,517	-
Carrying amount - 12.31.2020	48,648	290,699	11,283	350,630
12.31.2020				
Gross value.....	88,615	926,459	72,862	1,087,936
Accumulated depreciation	(39,967)	(635,760)	(61,579)	(737,306)
Carrying amount	48,648	290,699	11,283	350,630
Of which held for sale				(489)
				350,141
Carrying amount - 01.01.2021	48,648	290,699	11,283	350,630
Investments	555	63,193	2,526	66,274
Changes due to revisions of asset, retirement obligations.....	254	-	-	254
Disposals	(680)	(416)	(242)	(1,338)
Depreciation charge.....	(2,851)	(55,006)	(4,242)	(62,099)
Reclassifications	533	1,569	265	2,367
Carrying amount - 12.31.2021	46,459	300,039	9,590	356,088
12.31.2021				
Gross value.....	88,984	937,463	70,087	1,096,534
Accumulated depreciation	(42,525)	(637,424)	(60,497)	(740,446)
Carrying amount	46,459	300,039	9,590	356,088
Of which held for sale				(115)
				355,973

The right-of-use assets by class of underlying asset are listed in the table below. For further information see Note 17.

	Land and Buildings (a)	Telecom equipment	Other equipment	Total
01.01.2020				
Gross value	64,696	41,855	5,639	112,190
Accumulated depreciation	(9,405)	(4,776)	(1,906)	(16,087)
Carrying amount - 01.01.2020	55,291	37,079	3,733	96,103
Investments	26,889	12,184	2,712	41,785
Disposals	(402)	(1,995)	(102)	(2,499)
Depreciation charge.....	(10,065)	(5,202)	(2,177)	(17,444)
Carrying amount - 12.31.2020	71,713	42,066	4,166	117,945
12.31.2020				
Gross value.....	90,991	50,739	7,791	149,521
Accumulated depreciation	(19,278)	(8,673)	(3,625)	(31,576)
Carrying amount	71,713	42,066	4,166	117,945
Carrying amount - 01.01.2021	71,713	42,066	4,166	117,945
Investments	8,529	13,808	1,893	24,230
Disposals	(962)	(439)	(69)	(1,470)
Depreciation charge.....	(10,399)	(6,247)	(1,868)	(18,514)
Reclassifications	-	(2,205)	-	(2,205)
Carrying amount - 12.31.2021	68,881	46,983	4,122	119,986
12.31.2021				
Gross value.....	97,524	61,325	8,636	167,485
Accumulated depreciation	(28,643)	(14,342)	(4,514)	(47,499)
Carrying amount	68,881	46,983	4,122	119,986

(a) The classes of land and buildings were reviewed, and it was concluded that they are similar in use in Magyar Telekom's operations, therefore their aggregated balance is disclosed in a single column. This presentation is also in line with industry practice. Comparative information is presented accordingly.

The closing balance of Property, plant and equipment (PPE) includes assets under construction in an amount of HUF 44,910 million as at December 31, 2021 (2020: HUF 52,622 million). In the table above, the assets under construction are shown in the categories where the asset is expected to be classified when placed into service.

Changes due to revisions of asset retirement obligations represent the adjustments of the carrying amounts of the assets against a provision for asset retirement obligation (see also Note 13.2.4).

The amount of reclassifications and its effect on depreciation are not significant.

Investments represent the regular investing activity in PPE assets.

No impairment was identified in 2020 and 2021.

The Company has no PPE with restricted titles or pledged as security as at December 31, 2021 or December 31, 2020.

9.3 Review of useful lives

Reviews of the useful lives (and residual values) of property, plant and equipment based on the strategic directions and accepted annual development plans conducted in 2021 affected the useful lives of a large number of assets. The revisions resulted in the following change in the original trend of depreciation in the current and future years.

	2021	2022	2023	2024	After 2024
Increase / (decrease) in depreciation expense ...	(360)	742	874	62	(1,318)

Reviews of the useful lives (and residual values) of property, plant and equipment based on the strategic directions and accepted annual development plans conducted in 2020 affected the useful lives of a large number of assets. The shortened useful life of copper network elements is driven by preparations to the copper retirement program. The revisions resulted in the following change in the original trend of depreciation in the current and future years.

	2020	2021	2022	2023	After 2023
Increase / (decrease) in depreciation expense ...	6,495	2,685	(1,176)	(1,283)	(6,721)

10 INTANGIBLE ASSETS

10.1 Intangible assets – Accounting policies

Intangible assets (excluding goodwill) are measured at historical cost less accumulated amortization and any accumulated impairment losses.

Acquired computer software licenses are capitalized on the basis of the costs incurred to acquire and bring to use. These costs are amortized over the estimated useful life of the software. Costs associated with developing or maintaining computer software programs are generally recognized as an expense as incurred. Costs directly associated with the production of identifiable and unique software products controlled by the Company, and that will probably generate economic benefits exceeding costs beyond one year, are recognized as intangible assets. Direct costs include the software development employee-related costs and an appropriate portion of relevant overhead and borrowing costs.

Computer software development costs recognized as assets are amortized over their estimated useful lives. Most computer software capitalized include acquired elements representing the majority of the cost and own costs incurred to a lesser extent. These are considered non self developed software. Computer software fully developed by own resources represent an immaterial portion of all software, therefore these are not disclosed separately.

Costs associated with the acquisition of long-term frequency licenses are recognized as an intangible asset when the Company receives a right to charge users of the service provided under the license. The present value of the future annual payments for the use of the frequencies are also capitalized if these payments can be estimated reliably, or otherwise recognized as Other operating expenses in the year the payment obligation refers to. The useful lives of concessions and licenses are determined based on the underlying agreements and are amortized on a straight line basis over the period from availability of the frequency for commercial use until the end of the initial concession or license term. Renewal periods are considered in the determination of useful life only if the Company estimates that it will be realized without further consideration to be transferred.

Amortization of intangible assets is calculated on a straight-line basis from the time the assets are deployed and charged over their economic useful lives. Other than goodwill, the Company has no intangible assets with indefinite useful life. The amortization expense is presented in the depreciation and amortization line of the Statements of profit or loss and other comprehensive income.

On an annual basis, Magyar Telekom reviews the useful lives for consistency with current development and replacement plans and advances in technology. For further details on the groups of assets impacted by the most recent useful life revisions refer to Note 10.3. The annual revisions are conducted in the second quarter of the year and the resulting changes are applied from the third quarter of the year. In addition to the regular revisions, any investment decisions made throughout the year may also result in a change of useful life of a group of assets in any period of the year. The estimated useful lives of intangible assets other than goodwill are as follows:

	Years
Software	2-24
Concessions and licenses.....	3-25
Other intangible assets.....	3-10

At the date of transition to IFRS (January 1, 2016) the Company recognized goodwill on those investments that merged into the Company after their acquisition but before the date of transition to IFRS in its separate statements of financial position.

Goodwill represents the amount by which the cost of an acquisition exceeds over the fair value of the Company's share of the net assets and contingent liabilities of the acquired business at the date of acquisition. Goodwill is carried at cost less any accumulated impairment losses. Impairment testing is carried out on an annual basis for all goodwill based on the carrying values as at December 31. Impairment losses on goodwill are not reversed. Gains and losses on the disposal of an entity or business include the carrying amount of goodwill allocated to the entity or business sold.

In determining whether an asset that incorporates both intangible and tangible elements should be accounted for as property, plant and equipment or as an intangible asset, management uses judgement to assess which element is more significant and recognizes the assets accordingly.

Assets that are subject to amortization or depreciation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of the assets' fair value less cost of disposal and its value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows (cash-generating units – CGUs).

The fair values of the individual intangible assets of the Company in most cases cannot be determined as individual assets and do not generate cash flows. Instead, the Company determines CGUs to which the individual assets are allocated and the fair values can only be determined at CGU level, primarily by using discounted cash flow analyses. See also Note 3.2. Corporate assets which have the distinctive characteristics of not generating cash inflows independently of other assets or groups of assets are allocated to CGUs when conducting impairment tests.

10.2 Intangible assets in the statements of financial position

	Goodwill	Concessions and licenses	Software	Other	Total
01.01.2020					
Gross value.....	173,572	191,343	284,798	10,600	660,313
Accumulated amortization	-	(86,404)	(210,606)	(4,263)	(301,273)
Carrying amount	173,572	104,939	74,192	6,337	359,040
Carrying amount – 01.01.2020	173,572	104,939	74,192	6,337	359,040
Investments	-	92,583	12,707	2,863	108,153
Amortization charge.....	-	(17,286)	(18,889)	(2,030)	(38,205)
Reclassification	-	-	-	-	-
Carrying amount – 31.12.2020	173,572	180,236	68,010	7,170	428,988
12.31.2020					
Gross value.....	173,572	281,733	292,953	13,463	761,721
Accumulated amortization	-	(101,497)	(224,943)	(6,293)	(332,733)
Carrying amount	173,572	180,236	68,010	7,170	428,988
Carrying amount – 01.01.2021	173,572	180,236	68,010	7,170	428,988
Investments	-	83,090	18,763	2,839	104,692
Disposals	-	-	(4)	-	(4)
Amortization charge.....	-	(19,271)	(19,812)	(3,033)	(42,116)
Reclassifications.....	-	-	-	(163)	(163)
Carrying amount – 31.12.2021	173,572	244,055	66,957	6,813	491,397
12.31.2021					
Gross value.....	173,572	343,512	282,740	15,724	815,548
Accumulated amortization	-	(99,457)	(215,783)	(8,911)	(324,151)
Carrying amount	173,572	244,055	66,957	6,813	491,397

The amortization expense, as well as the impairment losses of intangible assets, including also goodwill, is accounted for in the Depreciation and amortization line of the Statements of profit or loss and other comprehensive income. The amount of reclassifications and its effect on depreciation are not significant.

Investments represent the regular investing activity in intangible assets and the new frequencies were acquired in 2021 that significantly increased the book value of concessions and licenses. HUF 83.1 billion was recognized consisting of the one-time spectrum fee and the present value of annual band fees related to 900 MHz, 1800 MHz spectrums. The useful life of these frequencies and the present value calculations are based on the term of rights of use for these frequencies. For further information see Notes 3.5, 4.4.3.1, 10.5, 28 and 34.2

The Company has no intangible assets with restricted title or pledged as security as at December 31, 2021 or December 31, 2020.

10.3 Useful lives

The reviews of the useful lives of intangible assets based on the strategic direction and accepted annual development plans during 2020 and 2021 affected the useful lives of a large number of assets primarily software. The revisions resulted in the following change in the original trend of amortization in the current and future years.

	2021	2022	2023	2024	After 2024
Increase / (decrease) in depreciation expense	(1,135)	261	948	138	(212)

	2020	2021	2022	2023	After 2023
Increase / (decrease) in depreciation expense	(510)	352	171	94	(107)

10.4 Goodwill

At the date of transition to IFRS (January 1, 2016) the Company recognized goodwill on investments that merged into the Company after their acquisition but before the date of transition to IFRS in its separate statements of financial position.

The Company recognizes goodwill for the following merged investments:

	12.31.2020	12.31.2021
T-Mobile	161,374	161,374
KTV/T-Kábel	4,408	4,408
T-Online	54	54
Emitel Zrt.	6,471	6,471
Dél-Vonal Kft.	100	100
Cable TV acquisitions	462	462
Modultechnika Kft.	703	703
Total.....	173,572	173,572

The Company is a considerable part of the MT-Hungary segment on Magyar Telekom Group level. The goodwill presented in the Company was tested as the considerable portion of this segment. The recoverable amount of the MT Hungary segment significantly exceeds the carrying amount, therefore there is no indication that the goodwill presented in the Company may be impaired.

For the goodwill impairment tests, the total amount of goodwill was allocated to the operating segments of the Group and the recoverable amounts of the operating segments were determined based on fair values less costs of disposal based on Level 3 inputs in the fair value calculations (Note 4.5.1). The recoverable amounts of the segments disclosed in the table below exclude net debts, which are not allocated to the segments. For further information, please also see Note 3.2.

	12.31.2020			12.31.2021		
	Carrying amount of		Recoverable amount of operating segment	Carrying amount of		Recoverable amount of operating segment
	goodwill allocated	operating segment (incl. goodwill)		goodwill allocated	operating segment (incl. goodwill)	
MT-Hungary	192,938	957,766	1,687,521	192,314	1,035,769	1,507,266

The Group regularly carries out an impairment test on goodwill in the last quarter of the financial years, while a simplified goodwill impairment test is conducted quarterly based on the main input changes. During the impairment tests

conducted in 2020 and 2021 no goodwill impairment was established for any goodwill.

10.5 Significant individual intangible assets

The Company's most significant individual intangible assets are the mobile licenses. The carrying values and remaining amortization periods of the significant licenses are listed in the table below. For further information on these assets, please see Note 34.2.

	12.31.2020		12.31.2021	
	Carrying amount	Remaining amortization period (years)	Carrying amount	Remaining amortization period (years)
700 MHz	40,554	19	38,447	18
800 MHz	29,660	13	27,463	12
900 MHz	8,441	13	39,584	12-21
1800 MHz	24,989	13	67,774	12-21
2100 MHz	32,505	6-19	29,047	5-18
2600 MHz	13,347	13	12,358	12
26 GHz	339	3-6	242	2-5
3600 MHz	30,025	19	28,905	18
Other	376	1-6	235	5
Total concessions and licenses	180,236		244,055	

11 INVESTMENTS

11.1 Investments – accounting policies

Investments in subsidiaries, associates and joint ventures are measured at cost less any accumulated impairment losses. Cost of an investment is the fair value of consideration given, including contingent considerations and transaction costs incurred during the acquisition process.

The Company examines whether an investment may or may not be impaired by using internal and external information.

Magyar Telekom implemented the requirements of the IAS 36 standard as follows:

If the carrying amount of investment exceeds HUF 20 billion then its recoverable amount is always analyzed using a DCF model (irrespective of whether there is any indication of impairment or not).

If the carrying amount of an investment does not exceed HUF 20 billion then the Company examines, considering the following, whether there were any changes related to these investments which requires the preparation of impairment assessment based on the DCF model:

- 1) The Company examines whether during the period there were or whether there are expected to be any significant adverse changes in the market or in the technological, economic and legal environment of the investment.
- 2) The company examines the forecasted results of its investments.
- 3) If subsidiaries, joint ventures or associates pay dividend then it has to be examined whether the investments' carrying amount in the Company's Separate Financial Statements exceeds the carrying amount of the investee's net assets (including goodwill) recognized in the consolidated financial statements. In addition, it has to be examined in the period the dividend was declared whether the dividend exceeds the total comprehensive income accumulated since the acquisition of the control which is subjectable for declaration as a dividend.

If any of the above three examinations indicates that the market value of the investment declines below its carrying amount then the Company prepares the impairment assessment based on a DCF model also for that investment where the carrying amount does not exceed HUF 20 billion.

If the carrying amount of the investment exceeds its recoverable amount, the Company recognizes the necessary impairment loss. If the recoverable amount of the investment exceeds its carrying amount, no impairment is necessary. When the estimates used to determine an asset's or a CGU's recoverable amount have improved since the last impairment loss was recognized, the impairment loss that was previously recognized for the asset, other than goodwill, is reversed.

In this case the carrying amount of an assets shall not be increased above the lower of:

- its recoverable amount and
- the carrying amount that would have been determined without any prior impairment loss.

For further information see Note 3.2.2.

11.2 Investments

Subsidiaries are entities controlled by the Company. The Company controls an entity when it is exposed to, or has rights to, variable returns from its involvement with the entity and has the ability to effect those returns through its power over the entity. The existence and effect of potential voting rights that are presently exercisable or presently convertible are also considered when assessing whether the Company controls another entity.

As December 31, 2020 and 2021, the Company's investments in subsidiaries are summarized as follows.

	01.01.2020 Opening balance	Changes in 2020	12.31.2020 Carrying amounts	Changes in 2021	12.31.2021 Carrying amounts
Stonebridge A.D.	77,999	-	77,999	-	77,999
T-Systems Magyarország Zrt. .	41,984	-	41,984	-	41,984
Combridge S.R.L.	2,544	-	2,544	-	2,544
Novatel E.O.O.D.	1,999	-	1,999	-	1,999
Investel Zrt.	1,658	-	1,658	-	1,658
Other.....	5,480	(54)	5,426	-	5,426
Total	131,665	(54)	131,610	-	131,610

The Company examined the indicators mentioned in Note 11.1 and carried out the tests as necessary which did not result into any impairment in 2021.

The ESOP (Employee Share Ownership Program) Organization was a special organization of Magyar Telekom which was controlled by the Company without any shares in it. The voluntary liquidation of the ESOP Organization ended in 2021.

Short descriptions of companies in which Magyar Telekom has significant shares:

Stonebridge Communications A.D. Skopje (Stonebridge A.D.)

In December 2000, Magyar Telekom, on behalf of a consortium, reached an agreement with the government of the Republic of North Macedonia to purchase 51 percent of Makedonski Telekom A.D., the leading telecommunication provider of North Macedonia. The 51 percent ownership acquired by Magyar Telekom was contributed in 2001 to a newly established Macedonian holding company, Stonebridge A.D. residing in Skopje which is owned 100% by Magyar Telekom.

T-Systems Magyarország Zrt. (TSM Zrt.)

In 2006 Magyar Telekom purchased the 100% ownership in KFKI Zrt. (the predecessor of T-Systems Magyarország Zrt.). In the course of the years the company acquired several firms which subsequently merged into the company. In December 2021, the Magyar Telekom Group signed an agreement for the sale of the total of its 100% shareholding in Pan-Inform Kft. by its sole owner of TSM Zrt. The scope of the agreement covers the support and development operations provided for central digital healthcare services in Hungary and for the related hospital information system, that partially had been involved in the operation of TSM Zrt. at year-end 2021. This transaction did not affect the value of the investment.

**Combridge S.R.L.**

The company is an alternative telecommunication service provider of Romania. Its main activities are: international and domestic leased line connection, international internet access, international IPVPN services, roaming services and international VoIP call termination. Magyar Telekom has a 100% share in Combridge S.R.L.

Novatel E.O.O.D.

The company was established in 2004 with headquarters in Bulgaria. The company's main activities are: international and domestic leased line connection, international internet access and IPVPN services, roaming services, infocommunication business solutions and international call termination. Magyar Telekom has a 100% share in Novatel E.O.O.D.

The Company had no investment in associates at December 31, 2020 and 2021.

A joint arrangement is an arrangement whereby two or more parties have joint control.

A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the arrangement. Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control.

Associates are entities over which the Company has significant influence but not control, generally reflecting a voting right between 20% and 50%.

The Company lost the joint control and significant influence over E2 Hungary Zrt. in February 2020 based on the agreement with MET Holding AG and after the approval of various competent authorities.

Following the loss of joint control and significant influence the investment in E2 Hungary Zrt. is accounted for as an equity investment measured at fair value through Profit or Loss under IFRS 9 and disclosed in Other non-current financial assets. The transaction did not generate a cash movement (see also Note 4.2.3.2).

As a result, HUF 1,000 million was disposed from the investment in the joint venture on the date of the loss of the joint control and significant influence. At the same time HUF 1,155 million was initially recognized in the other non-current financial asset, and HUF 139 million was recognized as a financial liability under IFRS 9 pertaining to the call option of MET Holding AG. on this investment, disclosed in Other non-current financial liabilities (see also Note 4.5.1.3) which resulted in a HUF 16 million gain. See subsequent measurement of the call option under Note 4.5.1.2.

The Company had no investment in joint ventures at December 31, 2020 and 2021.

11.3 Joint operations

Magyar Telekom and Telenor Hungary agreed in 2015 to jointly operate and develop their 800 MHz 4G mobile networks in all parts of Hungary except Budapest. The primary goal of the agreement was to accelerate 4G mobile broadband coverage rollout in the countryside and to offer higher bandwidth to the 4G customers, in line with the coverage obligations of the 800 MHz spectrum contract signed in 2014 with the NRA. Based on the agreement, Telenor Hungary maintains sites in West Hungary and Magyar Telekom operates base stations in the eastern region of the country.

The Company assessed the agreement as joint operation as strategic decisions are made jointly by Magyar Telekom and Telenor, and there is no separate vehicle to control the operation of the arrangement. The Company does not share the obligations for liabilities and any returns or expenses beyond the assets included in the agreement.

Therefore, only the assets owned by the Company are recognized while there is no need to present the partner's assets, liabilities, or revenue and expenses. The charges from Magyar Telekom to Telenor and from Telenor to Magyar Telekom are almost equal and settled on a net basis and accounted for in the Statements of profit or loss and other comprehensive income and the effect of this settlement is not significant.

If any of the parties initiates the termination of this contract, in order to ensure the continuous service for the customers the Company might be exposed to additional capital expenditure. The probability is estimated remote by the Management currently.

12 OTHER ASSETS

Other assets usually include current and non-current receivables considered non-financial instruments.

12.1 Other current assets

	12.31.2020	12.31.2021
Accrued income and prepayments for costs and expenses	1,861	3,121
Other tax receivable	313	858
Other receivables.....	452	326
Total	2,626	4,305

12.2 Other non-current assets

Other non-current assets include assets recognized from the costs to obtain contracts with customers (amounting to HUF 6,089 million, see Note 18.4) and HUF 36 million long-term prepaid employee benefits relating to housing loans provided by the Company to employees at lower than market interest rates.

13 PROVISIONS

13.1 Provisions – Accounting policies

Provisions are recognized when Magyar Telekom has a present legal or constructive obligation (excluding executory contracts) as a result of past events and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate of the amount of the obligation can be made.

Provisions are measured at the best estimate of the economic outflow required to settle the present obligation at the reporting date. The estimate can be calculated as the weighted average of estimated potential outcomes or can also be the single most likely outcome.

Provisions expected to fall due after 12 months are determined by discounting the expected future cash flows at the pre-tax rate that reflects current market assessment of the time value of money and the risks specific to the liability. The unwinding of the discount is recognized as Interest expense.

Expenses for provisions are recognized in the line item of the Statements of profit or loss and other comprehensive income where the actual expense is expected to be presented. When a provision is released unused, it is released to the same line item of the Statements of profit or loss and other comprehensive income where it was originally provided for. Provisions made for liabilities expected to be incurred in foreign currency are recognized in the functional currency at the spot FX rate, and any change in the provision in the functional currency as a result of a subsequent change in the FX rate is recognized in Other finance expense – net.

13.2 Provisions in the statements of financial position

	Severance payment	Share-based payments	Other employee-related	Total employee-related	Legal cases	ARO	Other	Total
01.01.2020	1,150	1,414	8	2,572	1,292	7,981	1,690	13,535
Reversed	(346)	(121)	-	(467)	(472)	(39)	(888)	(1,866)
Additions	4,459	1,486	3	5,948	23	166	1,066	7,203
Interest	-	(3)	-	(3)	(318)	127	-	(194)
Utilized (incl. interest component)	(3,392)	(915)	(3)	(4,310)	(70)	(25)	(1,663)	(6,068)
12.31.2020	1,871	1,861	8	3,740	455	8,210	205	12,610
Of which current	1,655	1,144	-	2,799	-	16	191	3,006
Of which non-current	216	717	8	941	455	8,194	14	9,604
01.01.2021	1,871	1,861	8	3,740	455	8,210	205	12,610
Reversed	(330)	(88)	(1)	(419)	(19)	(8)	(335)	(781)
Additions	1,989	1,663	3	3,655	552	262	1,909	6,378
Interest	-	(6)	-	(6)	486	174	-	654
Utilized (incl. interest component)	(2,914)	(1,133)	(1)	(4,048)	(22)	(42)	(450)	(4,562)
12.31.2021	616	2,297	9	2,922	1,452	8,596	1,329	14,299
Of which current	485	1,499	-	1,984	-	24	165	2,173
Of which non-current	131	798	9	938	1,452	8,572	1,164	12,126

The Interest lines in the table above include the subsequent unwinding of the discount applied at initial recognition and the interest element of any provision recognized, as well as the release of the interest / accretion element in the case of reversal of provisions.

Magyar Telekom does not expect any reimbursement with regards to the provisions recognized, therefore no related assets have been recognized in the financial statements.

13.2.1 Severance payment

The majority of the provision for severance as at December 31, 2021 relates to the stand-by-pool and the employee terminations payable in relation to the 2022 efficiency improvement in Magyar Telekom. The stand-by-pool of employees includes people whose legal status is an employee, however, these people do not provide services to the Company any more, but the Company provides a reduced amount of compensation and pays social security expenses for them. This is a manner of severance that is not paid in one lump sum but in monthly installments. The majority of the provision for severance as at December 31, 2020 also related to the stand-by-pool and the employee terminations paid in relation to the 2021 efficiency improvement in Magyar Telekom.

541 employees left the Company in 2021 (2020: 625), related to which termination payments were made. The balance of provision as at December 31, 2021 relates to 96 employees and stand-by-pool of employees (2020: 283).

The total payments made in relation to employee termination in 2021 amounted to HUF 3,178 million (2020: HUF 3,844 million).

13.2.2 Share-based payments

Share-based payments are detailed in Note 20.1.2.

13.2.3 Legal cases

Provisions for legal cases mainly include amounts expected to be paid to regulatory and competition authorities as well as to ex-employees and trading partners as a result of legal disputes. There are numerous legal cases for which provisions were recognized, which are individually not material.

13.2.4 Asset retirement obligations (ARO)

Asset retirement obligations primarily exist in the case of the telecommunications structures constructed on third parties' properties. The Company carries out a revision of the necessary provisions every year. The revisions did not result in material changes in 2021 or 2020.

13.2.5 Other provisions

Other provisions include guarantee obligations, onerous contracts and further other individually small items.

14 OTHER CURRENT LIABILITIES

	12.31.2020	12.31.2021
Other taxes and social security	9,305	7,056
Salaries and wages	5,468	4,828
Deferred revenue and advances received	2,132	2,040
Unused advance payments for asset-related grants (a)	21	12
Dividend payable to non controlled interest.....	17	17
Other liabilities	123	40
Total.....	17,066	13,993

(a) For further information see Note 4.2.3.2 (a).

15 OTHER NON-CURRENT LIABILITIES

The table below shows the balances of Other non-current liabilities.

	12.31.2020	12.31.2021
Other financial liabilities – non-current	2,907	2,474

Bonds were initially recognized in 2020 at fair value (HUF 67,875 million) net of transaction costs (HUF 12 million) incurred and increased by premium received (HUF 2,948 million), which resulted in a 1.2579% yield. The bond is subsequently measured at amortized cost under IFRS 9. Any difference between the proceeds (net of transaction cost) and the redemption amount are recognized in profit or loss over the period of the liability using the effective interest method.

For further information please see Note 4.4.2.

16 EQUITY

Equity reconciliation table

In accordance with Act C of 2000 on Accounting (HAR) effective in Hungary, the following equity reconciliation table shows the reconciliation between the components of equity presented in these financial statements (under EU IFRS) and the equity components defined by Section 4 (a) 114/B of HAR. The reconciliation consists of an allocation of equity components under EU IFRS to equity components under HAR and adjustments for differences between the equities determined on different bases



	31.12.2020	31.12.2021
Common stock	104,274	104,274
Reserves	470,309	496,550
Treasury stock	(9,351)	(19,566)
Profit or loss for the year.....	41,552	54,544
Equity in accordance with IFRS (Section 4 114/B)	606,784	635,802
Section 4 (a) 114/B Equity	606,784	635,802
Common stock provided for by the articles of association if that qualified as an equity instrument.....	104,274	104,274
Nominal value of own shares repurchased (-).....	(2,198)	(4,578)
Section 4 (b) 114/B Common stock in accordance with IFRS*	102,076	99,696
Section 4 (c) 114/B Subscribed but unpaid capital.....	-	-
Sum of all part of equity that does not comply with the definitions of common stock, subscribed but unpaid capital, retained earnings, valuation reserve, profit or loss for the year or restricted reserves in accordance with IFRS.....	20,226	12,390
Section 4 (d) 114/B Capital reserves	20,226	12,390
Previous years' profit accumulated and not yet distributed for the owners disclosed in the financial statements in accordance with IFRS that may not include other comprehensive income (±).....	442,931	469,171
Section 4 (e) 114/B Retained earnings	442,931	469,171
Section 4 (f) 114/B Valuation reserve	-	-
Profit or loss for ongoing activities disclosed in statement of performance in its own right within the comprehensive income statement or in the separate profit and loss statements	41,552	54,544
Section 4 (g) 114/B Profit or loss for the year	41,552	54,544
Section 4 (h) 114/B Restricted reserves	-	-
Section 5 (a) 114/B Reconciliation of the capital registered by the Court of Registry with the subscribed capital under IFRS		
Capital registered by the Court of Registry	104,274	104,274
Subscribed capital under IFRS	102,076	99,696
Difference (nominal value of treasury stock repurchased)	2,198	4,578
Section 5 (b) 114/B Untied retained earnings available for the payment of dividends		
Retained earnings (contains profit or loss of the last financial year)	484,482	523,715
Untied retained earnings available for the payment of dividends	484,482	523,715

*Common stock shows the value of common stock recorded in article of association in the balance sheet, the table above contains the deduction defined in the relevant sections of the Hungarian Act on Accounting.

17 LEASES

17.1. Leases – Accounting policies

A contract is a lease (or contains a lease) if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

Recognition exemptions

Short-term leases, low value leases

IFRS 16 includes recognition exemptions available to lessees for short-term leases and leases of low-value items and specifies alternative requirements.

- In the Company, a decision was made not to apply the short-term recognition exemptions to lease contracts, except for some minor and insignificant lease arrangements with a lease term of one month or less. Such very short-term leases and related asset classes are expensed as incurred and no additional quantitative disclosure is required.
- The Company has made the decision not to apply the practical expedient with respect to low-value items. Hence they have to be recognized, measured and presented as lease arrangements in the scope of IFRS 16.

Lease term

The lease term assessment at the commencement date refers to the period for which Magyar Telekom is reasonably certain to maintain the contract under the terms and conditions as originally negotiated. The initial lease term assessment is made at commencement of the lease. When determining the lease term, the shortest reasonably possible, i.e. justifiable, term is always to be used in the case of doubt. The lease term assessment is largely based on management judgement and Magyar Telekom usually use estimates or assumptions (especially in the case of options and indefinite contracts) on asset cluster level.

The commencement date of the lease (commencement date), is the date on which a lessor makes an underlying asset (i.e., the property, plant or equipment that is subject to the lease) available for use to the lessee. At the commencement date, the lease term begins and lease liability and the right-of-use asset is initially recognized and measured.

Options- “Reasonably certain criteria”

In assessing whether a lessee is reasonably certain to exercise an option to extend a lease, or not to exercise an option to terminate a lease, lessees and lessors shall consider all relevant facts and circumstances that create an economic incentive for the lessee to exercise the option to extend the lease, or not to exercise the option to terminate the lease.

Lease payments

Lease payments are defined in the same way for both lessees and lessors. Lease payments are defined as payments made by a lessee to a lessor relating to the right to use an underlying asset during the lease term. The definition of lease payments, for Magyar Telekom lessees, includes payments for non-lease components as well.

Reassessment of the lease liability

IFRS 16 specifies when the lease liability has to be reassessed. It is important to note that, in terms of IFRS 16, a reassessment of the lease liability only takes place if the change is based on already existing contractual clauses, i.e. those that have been part of the contract since commencement.

A lessee reassesses the lease term, i.e. whether it is reasonably certain to exercise an extension option, or not to exercise a termination option, upon the occurrence of either a significant event or a significant change in circumstances that is within the control of the lessee; and affects whether the lessee is reasonably certain to exercise an option not previously included in its determination of the lease term, or not to exercise an option previously included in its determination of the lease term.

Accounting for lease modifications

A lease modification is defined as “a change in the scope of a lease, or the consideration for a lease, that was not part of the original terms and conditions of the lease (for example, adding or terminating the right to use one or more underlying assets, or extending or shortening the contractual lease term)”. Modification can result from a change in consideration only. The effective date of the modification is defined as the date when both parties agree to a lease modification.

A lessee accounts for a lease modification as a separate lease if both of the following conditions are fulfilled:

- the modification increases the scope of the lease by adding the right to use one or more underlying assets; and
- the consideration for the lease increases by an amount equivalent to the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.

When these conditions are met, the modification is considered to result in the creation of a new lease that is separate from the original lease. The agreement for the right to use one or more additional assets is accounted for as a separate lease (or leases) to which the requirements of IFRS 16 are applied independently of the original lease.

For a lease modification that is not a separate lease, i.e. that does not meet the conditions outlined above, at the effective date of the modification, the lessee accounts for the lease modification by remeasuring the lease liability using a discount rate determined at that date and:

- for lease modifications that decrease the scope of the lease, the lessee decreases the carrying amount of the right-of-use asset to reflect the partial or full termination of the lease, and recognizes a gain or loss that reflects the proportionate decrease in scope; and
- for all other lease modifications, the lessee makes a corresponding adjustment to the right-of-use asset.

When a lease arrangement is modified, then the revised lease payments will always be discounted with a revised discount rate. This is different from the requirements for a reassessment of the lease, where only in specific cases a revised discount rate is required

Presentation and disclosures for Magyar Telekom as lessee

Statements of financial position

The Company decided to present the right-of-use assets (separately from other assets) as well the lease liabilities as separate line items on the face of the statements of financial position.

Statements of profit or loss and other comprehensive income

In the statements of profit or loss and other comprehensive income Magyar Telekom presents separately interest expense on the lease liability from depreciation for the right-of-use asset. In addition, interest expense on the lease liability is a component of finance costs.

Statements of cash flows

The following items are presented within operating activities in the statements of cash flows:

- cash payments for the interest portion of the lease liability, according to the Company accounting policy to present interest payments in operating cash flows and;
- variable lease payments not included in the lease liability

Cash payments for the principal portion of lease liability are presented within financing activities in the statements of cash flows.

Presentation and disclosures for Magyar Telekom as lessor

Presentation of leases in Statements of profit or loss and other comprehensive income and in Statements of financial position

In the Statements of profit or loss and other comprehensive income, operating lease revenue is not disclosed separately from other revenue. There is only one-line item titled "Revenue".

The operating lease revenue line item in the Notes is titled "Other sources" (see Note 18.3.1).

Magyar Telekom as a Lessor presents assets subject to operating leases in its statements of financial position according to the nature of the underlying asset. In the Company, portions of assets that are physically distinct and are identified as underlying assets (leases) are not presented separately from the whole asset in the statements of financial position.

Other lease topics

Sale and leaseback transactions

Assessing whether the transfer of the asset qualifies as a sale

In the Company, both the short-term and the low value recognition exception have not been elected for any asset class. As a result, Magyar Telekom seller-lessee will always recognize (materiality considered) sale-and-leaseback transactions on-balance sheet. To determine how to account for a sale-and-leaseback transaction, the Company first considers whether the initial transfer of the underlying asset from the seller-lessee to the buyer-lessor is a sale. The Company then applies IFRS 15 to determine whether a sale has taken place. This assessment determines the accounting by both the seller-lessee and the buyer-lessor, as follows.

Accounting for sale and leaseback – Transfer of an asset is not a sale

If the transfer of an asset is not a sale, the seller-lessee and the buyer-lessor account for the transaction as financing.

Accounting for sale and leaseback – Transfer of an asset is a sale

If control passes as defined in IFRS 15 (sale), the seller-lessee must recognize an asset at an amount equalling the pro-rata carrying amount arising from the pro-rata right-of-use retained. Any gains or losses from this transaction are also only recognized proportionately. Hence, the seller-lessee restricts the gain that it recognizes on the sale to the amount that relates to the portion of the underlying asset that has been transferred, i.e. to the buyer-lessor's residual interest in the underlying asset.

Sale and leaseback transactions have no material effect on financial statements of Magyar Telekom.

Subleases

A sublease is defined as a transaction for which an underlying asset is re-leased by a lessee ('intermediate lessor') to a third party, and the lease ('head lease') between the head lessor and lessee remains in effect.

In classifying a sublease, Magyar Telekom, as the intermediate lessor, should classify the sublease as a finance lease or an operating lease in the same manner as any other lease using the criteria discussed in IFRS 16.61.

Sublease is a finance lease

If Magyar Telekom classifies the sublease as a finance lease, the lease is entered into the following:

- derecognize the right-of-use asset relating to the head lease that it transfers to the sublessee and recognizes the net investment in the sublease;
- recognize any difference between the right-of-use asset and the net investment (finance lease receivable) in the sublease in profit or loss; and

- retain the lease liability relating to the head lease in its statements of financial position, which represents the lease payments owed to the head lessor.

At the commencement date of the sublease, if Magyar Telekom cannot readily determine the rate implicit in the sublease, then it uses the discount rate that it uses for the head lease to account for the sublease, adjusted for any initial direct costs associated with the sublease.

Presentation and disclosures for subleases

No sublease-specific balance sheet and income statements presentation rules apply to subleases. Magyar Telekom applies the respective presentation rules that apply to other finance and operating leases.

Magyar Telekom does not offset assets and liabilities arising from a head lease and a sublease of the same underlying asset, unless the financial instruments requirements for offsetting are met. The same applies to lease income and lease expenses relating to a head lease and a sublease of the same underlying asset, unless the requirements for offsetting in IAS 1 are met.

Under IFRS 16 the head lease and a sublease are two separate contracts that are accounted for under the lessee and lessor models, respectively. The general disclosure rules equally apply for the head lease and for subleases, either disclosures for finance sub-lessors or operating sub-lessors.

Lessor accounting

Finance lease – Definition

A finance lease is a lease that transfers substantially all the risks and rewards incidental to ownership of an underlying asset to the lessee. The nature of finance lease arrangement are akin to financing the sale of an asset. The presentation in the financial statements departs from the legal lease form of the transaction and is based on the economic substance (i.e. as if the underlying lease asset was sold by the lessor to the lessee).

Operating lease – Definition

An operating lease is a lease that does not transfer substantially all the risks and rewards incidental to ownership of an underlying asset. There is a typically simple short-term hire arrangement (an operating lease), whereby rental payments received are dealt with in profit or loss with the primary impact on the balance sheet relating to the timing of lease payments.

17.2 Finance lease

17.2.1 Finance lease – Company as lessor

Future lease receivables under finance leases at December 31, 2020 and 2021 are as follows:

	12.31.2020			12.31.2021		
	Present value	Interest component	Minimum lease receipt	Present value	Interest component	Minimum lease receipt
Within 1 year.....	417	306	723	443	289	732
1–2 years.....	431	286	717	437	267	704
2–3 years.....	425	264	689	376	246	622
3–4 years.....	366	244	610	397	225	622
4–5 years.....	386	223	609	412	203	615
After 5 years	3,779	888	4,667	3,406	694	4,100
Total.....	5,804	2,211	8,015	5,471	1,924	7,395

The interest component represents the unearned finance income. The present value due within one year is included in Other current financial assets, while the present value after one year is included in Other non-current financial assets. The finance income accruing to the Company over the lease term is recognized in the Profit for the year (Interest income). See Note 23.

The unguaranteed residual values accruing to the benefit of the Company are insignificant.

17.2.2 Lease – Company as lessee

Leases are mainly in respect of the rental of the new headquarters, mobile cell sites and sale and lease back of spaces in buildings accommodating telephone exchanges, and to a lesser extent, related to other buildings, network and other telecommunications facilities, equipment and vehicle.

In most cases the contracts are denominated in HUF and EUR, the term of the leases is 4–14 years, and the contracts include renewal options but no purchase options.

Leases of buildings generally have lease terms between four and thirteen years, in the case of telecom equipment four and nine years, while these terms are between one and four years for motor vehicles and other equipment. The Company's obligations under its leases are secured by the lessor's title to the leased assets. Generally, the Company is restricted from assigning and subleasing the leased assets and some contracts require the Company to maintain certain financial ratios.

The maturity analysis of lease liabilities is disclosed in Note 5.1.3.

The following are the amounts recognized in profit or loss:

	2020	2021
Depreciation expense of right-of-use assets	17,444	18,514
Interest expense on lease liabilities	5,397	4,446
Foreign exchange loss on lease liabilities	5,014	465
Gains or losses arising from sale and leaseback transactions	1,984	-

The Company had total cash outflows for leases of HUF 21,136 million in 2021 (HUF 24,685 million in 2020). The Company has various lease contracts that have not yet commenced as at December 31, 2021. The future lease payments for these non-cancellable lease contracts are HUF 10,446 million (HUF 8,995 million in 2020).

The amount of undiscounted potential future rental payments relating to periods following the exercise date of extension and termination options that are not included in the lease term is HUF 13,825 million (HUF 13,144 million in 2020). The Company initially estimates and recognizes amounts expected to be payable under residual value guarantees as part of the lease liability. Typically, the expected residual value at lease commencement is equal to or higher than the guaranteed amount, and so the Company does not expect to pay anything under the guarantees.

As at December 31, 2021, the amount of residual value guarantees to which the Company is potentially exposed that are not reflected in the measurement of lease liabilities is HUF 88 million (HUF 123 million in 2020), which is not expected to be payable.

17.3 Operating leases – Company as lessor

The following tables include the future minimum lease payments receivable by the Company for the operating leases of mobile tower sections, network, dark fiber, buildings and from 2021 customer premise equipment where Magyar Telekom is the lessor.

	12.31.2020	12.31.2021
Within 1 year.....	3,011	4,533
1–2 years.....	2,833	4,139
2–3 years.....	2,699	3,887
3–4 years.....	2,583	3,782
4–5 years.....	2,171	3,233
After 5 years	5,214	6,267
Total.....	18,511	25,841

The Company has no lease income relating to variable lease payments that do not depend on an index or rate.

The following table disaggregates class of property, plant and equipment into assets subject to operating leases:

	Building	Telecom equipment	Total
01.01.2020			
Gross value.....	3,831	1,370	5,201
Accumulated depreciation	(1,538)	(754)	(2,292)
Carrying amount 01.01.2020	2,293	616	2,909
Carrying amount 01.01.2020	2,293	616	2,909
Additions	166	311	477
Depreciation charge.....	(141)	(120)	(261)
Carrying amount 12.31.2020	2,318	807	3,125
12.31.2020			
Gross value.....	3,997	1,681	5,678
Accumulated depreciation	(1,679)	(874)	(2,553)
Carrying amount 12.31.2020	2,318	807	3,125
Carrying amount 01.01.2021	2,318	807	3,125
Additions	83	1,128	1,211
Disposal	(136)	(159)	(295)
Depreciation charge.....	(123)	(334)	(457)
Carrying amount 12.31.2021	2,142	1,442	3,584
12.31.2021			
Gross value.....	3,782	2,493	6,275
Accumulated depreciation	(1,640)	(1,051)	(2,691)
Carrying amount 12.31.2021	2,142	1,442	3,584

18 REVENUE

18.1 Revenue – accounting policies

18.1.1 Sale of goods and Rendering of services

The core principle of IFRS 15 is for companies to recognize revenue to depict the transfer of goods or services to customers in amounts that reflect the consideration (that is, payment) to which the company expects to be entitled in exchange for those goods or services.

Revenue should be recognized if it is probable that the Company will collect the consideration to which it will be entitled in exchange for the goods or services that will be transferred to the customer. If the Company determines that collectability is no longer ensured (e.g. because subsequently the customer's ability or intent to pay significantly deteriorates), the Company must apply cash accounting for the remainder of the contract, i.e. for the outstanding goods and services to be provided. This reassessment does not affect recorded assets and revenue relating to performance obligations already satisfied.

Revenue is recognized when or as performance obligations are satisfied by transferring control of a promised good or service to a customer. Control either transfers over time or at a point in time, which affects when revenue is recorded.

As a practical expedient, the Company applies the guidance to a group of contracts with similar characteristics instead of to a single contract with a customer. A portfolio approach is acceptable if the Company can reasonably expect that the effect of applying a portfolio approach to a group of contracts or group of performance obligations would not differ materially from considering each contract or performance obligation separately. This implies that a portfolio of contracts with similar characteristics does not necessarily need to refer to homogenous products being included in these contracts.

Main principles

- If the Company performs by transferring goods or services to a customer before the customer pays consideration or before payment is due, the Company shall present the contract as a Contract asset, excluding any amounts presented as a receivable. A contract asset is the Company's right to consideration in exchange for goods or services that the Company has transferred to a customer.
- In the case of multiple-element arrangements (e.g., mobile contract plus handset) with subsidized products delivered in advance, a larger portion of the total remuneration is attributable to the component delivered in advance (mobile handset), requiring earlier recognition of revenue. This leads to the recognition of what is known as a contract asset – a receivable arising from the customer contract that has not yet legally come into existence – in the Statements of Financial Position.
- Expenses for sales commissions (customer acquisition costs) must be capitalized in the Contract costs line of the Statements of Financial Position and recognized over the estimated customer retention period.
- Later recognition of revenue appears in cases where “material rights” are granted, such as offering additional discounts for future purchases of further products.
- Contract liabilities are netted off against the contract assets for each customer contract.
- The Company presents the revenue on gross basis (as principal) when it controls the specified goods or services before they are transferred to the customer, and it must be transferred by the Company.
- In case of the Company resells the services of another party towards the customer, but does not control them, all related revenue and expenses are presented on gross basis, if both of the below conditions are met:
 - the Company has entered into a distribution agreement with the supplier under which an enforceable right was received to resell a limited or unlimited number of the agreed-upon services to the Company's customers at predefined prices any time upon request; and
 - the Company has discretion in setting the selling prices or determining the price of the service package where another party's service is already included.
- A significant financing component is not considered for the amount and timing of revenue recognition if the period between when a promised good or service is transferred to the customer and when the customer pays for that good or service will be one year or less.
- If the promise to grant a license is distinct from the other promised goods or services in the contract then the promise to grant the license is a separate performance obligation and the Company shall determine whether the license transfers to a customer is either at a point in time or over time.

18.1.2 Revenue from operating leases

Revenue from operating leases is recognized as revenue on a straight line basis over the term of the lease. Lease incentives granted are recognized as an integral part of the total rental income, over the term of the lease. For further information, please see Note 17.3.



18.2 Revenue from major service lines

18.2.1 Mobile and fixed-line telecommunications revenue

Revenue is primarily derived from services provided to Magyar Telekom's customer subscribers and other third parties using Magyar Telekom's telecommunications network and equipment sales.

Customer subscriber arrangements typically include an equipment sale, subscription fee and charge for the actual voice, internet, data or multimedia services used.

Airtime revenue is recognized based upon minutes of use and contracted fees less credits and adjustments for discounts, while subscription and flat rate revenue is recognized in the period they relate to. Usage-based consideration (e.g. airtime) is generally not part of the transaction price as the Company does not have the right to consideration at contract inception.

The Company provides customers with narrow and broadband access to its fixed, mobile and TV distribution networks.

Advertising revenue is recognized in the period that the advertisements are exhibited.

Revenue from premium rate services is recognized on a gross basis when the delivery of the service over Magyar Telekom's network is the responsibility of the Company, the Company determines the prices of these services and bears their substantial risks; otherwise this revenue is presented on a net basis.

Customers may also purchase prepaid mobile, public phone and internet credits (cards) which allow those customers to use Magyar Telekom's telecommunications network for a selected amount of time. Customers must pay for such services at the date when the card is purchased. Revenue from the sale of cards is recognized when they are used by the customers or when the credits expire with unused traffic.

Third parties using Magyar Telekom's telecommunications network include roaming customers of other service providers and other telecommunications providers which terminate or transit calls on Magyar Telekom's network. These wholesale (incoming) traffic revenue is recognized in the period of related usage. A proportion of the revenue received is often paid to other operators (interconnect) for the use of their networks, where applicable. The revenue and costs of these transit calls are stated gross in the Financial statements as the Company is the principal supplier of these services using its own network freely defining the pricing of the services and recognized in the period of related usage.

Contracts are frequently sold to customers containing a cross subsidy between two or more components. A typical example is where a mobile phone is sold at a price significantly below its market value in a bundle with a service contract for a period of 12 or 24 months. From a commercial point of view, the subsidy on the mobile phone is compensated via the service fee.

With this adjustment requirement (also termed as "basic adjustment") a cross-subsidy or an overall bundle discount must be allocated to the individual components of the bundle so that revenue generally reflects the fair value of the good and/or service with a bundle discount being appropriately distributed among the affected items.

The revenue is determined for every component by distributing the transaction price to the individual components in proportion to their relevant standalone selling prices.

18.2.2 System integration (SI) and IT revenue

Contracts for network services, which consist of the installation and operation of communication networks for customers, have an average duration of 2-3 years.

Revenue from outsourcing contracts reflects the extent of actual services delivered in the period in accordance with the terms of the contract. The contracts are analyzed based on the IFRS 16 requirements – determining whether an

Arrangement contains a Lease, and if they include embedded lease elements, the revenue attributable to these is recognized according to IFRS 16 – Leases as described in Note 17.

Revenue from system integration contracts requiring the delivery of customized products and/or services is generally covered by one of the following types of contracts: fixed-price or time and material-based.

Magyar Telekom transfers control of goods and services over time therefore satisfies a performance obligation and recognizes revenue over time, if one of the following criteria is met:

- a customer simultaneously receives and consumes the benefit provided by Magyar Telekom's performance as Magyar Telekom performs
- Magyar Telekom's performance creates or enhances assets that the customer controls as the asset is created or enhanced
- Magyar Telekom's performance does not create an asset with an alternative use to Magyar Telekom and Magyar Telekom has an enforceable right to payment for performance completed to date.

If the performance obligation is not satisfied over time, Magyar Telekom satisfies the performance obligation at a point in time.

Revenue from maintenance services (generally fixed fee per month) is recognized over time. Revenue from repairs, which are not part of the maintenance contract, billed on the basis of time and material used is recognized at point in time.

Revenue from hardware sales or sales-type leases is recognized when the customer obtains the control over the product.

To determine the progress of performance, Magyar Telekom applies the Input method. Magyar Telekom recognizes revenue based on its efforts or inputs to satisfaction of a performance obligation (resources consumed, labor hours expended, cost incurred, time elapsed or machine hours used) relative to the total expected inputs to the satisfaction of the performance obligation.

18.3 Revenue in the Statements of profit or loss and other comprehensive income
18.3.1 Disaggregation of revenue from contracts with customers

	2020	2021
Mobile revenue		
Voice retail	110,725	105,910
Voice wholesale	8,373	8,917
Data	92,934	108,814
SMS.....	19,268	22,599
Equipment.....	88,077	94,525
Other mobile revenue	8,930	9,238
Total Mobile revenue	328,307	350,003
Fixed line revenue		
Voice retail	34,151	31,742
Broadband retail*.....	48,026	53,133
TV	42,783	46,691
Equipment.....	21,588	18,658
Data retail*	9,918	10,202
Wholesale.....	13,191	12,882
Other fixed-line revenue.....	15,305	14,569
Total fixed-line revenue.....	184,962	187,877
System integration and IT revenue	10,862	10,412
Total revenue.....	524,131	548,292
Of which:		
Revenue from contracts with customers.....	520,852	544,419
Other sources	3,279	3,873

*In the case of 2020 data, HUF 2,378 million has been reclassified from Broadband retail to Data retail for ensuring comparability.

Other sources of revenue include real estate and network rental fees which are presented above in the Fixed-line wholesale and Fixed-line other revenue lines.

Equipment revenue is recognized at a point in time while service revenue is recognized over time.

None of the Company's customers represent a significant source of revenue individually. Revenue from transactions with a single external customer (or group of entities that – knowingly to us – are under common control of a third party or government) do not exceed 10% of the Company's revenue.

Regarding geographical segmentation of revenue please see Note 33.

18.4 Assets and liabilities related to contracts with customers

Contract assets of the Company consist of unbilled amounts typically resulting from sales under long-term contracts when revenue recognized exceeds the amount billed to the customer.

Contract liabilities consist of advance payments and billings in excess of costs incurred and deferred revenue.

	12.31.2020	12.31.2021
Contract assets – current	12,006	13,158
Contract assets – non-current	3,411	3,620
Contract liabilities – current.....	(7,660)	(8,090)
Net contract assets (liabilities)	7,757	8,688
Revenue recognized in the reporting period from amounts included in contract liability at the beginning of the period.....	5,780	6,751
Asset recognized from the costs to obtain contracts with customers	4,951	6,089
Amortization recognized as cost of obtaining contracts during the period	(5,255)	(6,068)

Impairment losses recognized on contract assets are disclosed together with trade receivables in Note 4.2.2.2. and amounted to HUF 1,598 million as at December 31, 2021 (HUF 1,615 million in 2020).

As of December 31, 2021, the aggregate amount of the transaction price allocated to the remaining performance obligation is HUF 175,330 million and the Company will recognize this revenue as services are rendered, which is expected to occur over the next 13-24 months.

19 DIRECT COSTS

19.1 Telecom tax

Telecom tax was introduced in Hungary for fixed and mobile voice and mobile SMS/MMS services, effective from July 1, 2012. The tax imposed on fixed and mobile usage amounts to HUF 2 per minute and HUF 2 per SMS/MMS for private individual subscribers' subscriptions and to HUF 3 per minute and HUF 3 per SMS/MMS for non-private individual subscribers' subscriptions. The tax is capped at HUF 700 and HUF 5,000 per month per calling number for private and non-private individuals' subscriptions, respectively.

19.2 Other direct costs

Other direct costs include costs of mobile and fixed devices, accessories and other equipment, agent commissions and non-voice direct costs.

20 EMPLOYEE-RELATED EXPENSES

20.1 Employee-related expenses – Accounting policies

20.1.1 Short-term employee benefits

Short-term employee benefits are recognized as a current expense in the period when employees render their services. These include wages, social security contributions, bonuses, paid holidays, discounted telephone bills, meal and holiday contributions and other fringe benefits and the tax charges thereon.

Payments to defined contribution pension and other welfare plans are recognized as an expense in the period in which the service is rendered by the employees.

20.1.2 Share-based payments

Magyar Telekom recognizes the costs of services received from its employees in a Share-based payment transaction when services are received. Magyar Telekom recognizes a corresponding increase in its equity reserves (Reserve for equity-settled share-based transactions) if the services are received in an equity-settled share-based payment transaction. When the share-based compensation program is completed, i.e. the shares are transferred to the employees' ownership or the share options have forfeited, the respective reserve is derecognized. If the services are received in a

cash-settled share-based payment transaction, the Company recognizes the expense against a liability, re-measured to fair value at each financial statement date.

Bonuses tied to the long-term performance of the Magyar Telekom and Deutsche Telekom shares are recognized in the Profit for the year at their time-proportioned fair value against an accumulating balance in liabilities.

20.1.2.1 Share Matching Plan of Deutsche Telekom Group

As of July 1, 2015, Magyar Telekom implemented a Share Matching Plan for all executives (ca. 40). Participation in the program is voluntary, with the exception of the CEO.

The participant can invest a minimum of 10% of his/her gross annual bonus in Deutsche Telekom shares, with an option to voluntarily increase this amount to a maximum of 50% (personal investment). These shares must be kept for at least for four years (the lock-up period), the participant is granted matching shares upon expiry of the lock-up period. The share allocation ratio of the program (1:1 or 1:2) depends on the participant's individual Management Group (MG). Deutsche Telekom grants the matching shares to the participant based on the Deutsche Telekom shares acquired by the participant within the framework of the program. The program starts annually if the free cash flow target of Deutsche Telekom Group was met in the previous year.

The program initiated by DT is settled in DT shares with the participants, meanwhile Magyar Telekom has to settle it with DT AG in cash at the same time participants are granted the DT shares therefore the closing balance of the program is presented as a related-party financial liability in the Separate statements of financial positions as it is settled in cash from the perspective of Magyar Telekom and is due to be paid to DT AG.

In 2021 HUF 31 million was recognized (2020: HUF 28 million) as expense for the program.

20.1.2.2 Long-term incentive program (LTI)

As of January 1, 2015, Magyar Telekom Company changed its existing LTI program, which turned it into a share-based compensation program. The 2021 LTI program is a global, Deutsche Telekom Group-wide incentive program.

Approximately 40 executives may participate in the program. The CEO's participation is unconditional, while other executives may participate only if the evaluation of the participant's performance in the previous year meets the requirements.

LTI is payable in cash tied to the achievement of four key strategic indicators. In the framework of the program, in each year a new four-year tranche is to be launched. Payment is due after the end of the program term depending on the evaluation of the achievement of the pre-set targets (0 to 150%).

At the beginning of the program, the relevant incentive amount is converted into a number of virtual shares of DT AG and awarded to the plan participant in the form of virtual shares (basic number). The annual level of target achievement is determined at the end of each year. This target achievement level is multiplied on a pro rata basis by the basic number of virtual shares awarded. The number of virtual shares calculated using this method shall then be "fixed" for the plan participant as the binding result for that specific year ("annual result"). At the end of the plan term, the four binding annual results shall be added together. The resulting total number of virtual shares shall be converted into cash applying the prevailing price of DT AG shares at that time, which is paid to the plan participants. For dividend payments during the plan term, the virtual shares shall be treated as real shares. The dividends shall be taken into account as follows: The first/second/third dividend payments shall be "reinvested" into virtual shares when the actual dividends are paid on real shares. The fourth (and last) dividend payment shall not be reinvested but paid in cash together with the plan payment following the DT AG shareholders' meeting at which a decision is made regarding this dividend payment. The plan currency is euro.

In 2021, HUF 446 million was recognized as expenses for the program (2020: HUF 573 million).

20.1.3. Repeated Performance Incentive (RPI)

The RPI honors repeated, extraordinary collective performance, which is measured by the overachievement of a defined bonus KPI. The group-wide relevant bonus KPI is EBITDA unadjusted. RPI is for a defined group of Executives (including Business Leaders) at Deutsche Telekom Group.

It was a four-year plan, running from 2018 to 2021. If the target achievement was met in two consecutive years as defined in the policy regarding the RPI, the first year was only considered as the year of eligibility. HUF 975 million was recognized as expenses on RPI in 2021 (2020: HUF 651 million). The amount of the bonus payout depended on Management level, target achievement of the segment and the number of years of consecutive overperformance.

20.1.4 Termination benefits

Termination benefits are payable whenever an employee's employment is terminated before the nominal retirement date or whenever an employee accepts voluntary redundancy in exchange for these benefits. The Company recognizes termination benefits when it is demonstrably committed to either terminate the employment of current employees according to a detailed formal plan without the possibility of withdrawal or to provide termination benefits as a result of an offer made to encourage voluntary redundancy.

20.2 Employee-related expenses in the Statements of profit or loss and other comprehensive income

	2020	2021
Short-term benefits (Note 20.1.1)	57,648	56,871
Termination benefits (Note 20.1.4).....	4,584	1,927
Equity-settled share-based compensations (Note 20.1.2.1).....	28	31
Cash-settled share-based compensations (LTI) (Note 20.1.2.2).....	573	446
Cash-settled share-based compensation (RPI) (Note 20.1.3)	651	975
Total before capitalization	63,484	60,250
Expenses capitalized	(5,465)	(4,150)
Total	58,019	56,100
Total costs expensed in relation to defined contributions (including social security contribution)	9,192	8,208
Average number of employees (full time equivalent).....	5,278	5,042
Closing number of employees (full time equivalent)	5,149	4,947

21 OTHER OPERATING EXPENSES

		2020	2021
Cost of other purchased services	(a)	37,352	35,327
Utility tax		7,211	7,187
Marketing expenses		6,501	6,737
Energy costs		6,714	5,819
Other operating expenses		7,117	8,655
Total		64,895	63,725

Research as well as marketing costs are expensed as incurred. The Company did not recognize research and development among other operating expenses in 2020 and 2021.

(a) Audit costs included in other purchased services

Cost of other purchased services, among others, include expenses incurred in relation to the audit of the separate and consolidated financial statements of the Company as well as other services provided by PricewaterhouseCoopers Könyvvizsgáló Kft. (PwC) as follows.

	2020	2021
Audit of the financial statements	313	313
Other audit-related fees.....	2	5
Other non-audit-related fees	81	105
Total expenses payable to PwC	396	423

Audit of the financial statements is the aggregate fees of PwC in connection with the audit of our annual financial statements and services performed in relation to legal obligations and submissions required by regulatory provisions. Review of the quarterly financial statements is also included, as well as information systems and procedural reviews and testing to understand and place reliance on the systems of internal control.

Other audit-related services mainly include other professional auditing services provided by the Auditor beyond the audit of the financial statements, as well as other audit procedures necessary for meeting the reporting requirements arising from relevant legislation and internal regulations.

Other non-audit related fees are fees of PwC primarily related to consulting services and services like participation by Magyar Telekom employees in conferences and training sessions organized by PwC.

22 OTHER OPERATING INCOME

	2020	2021
Gain on the sale of PPE, Intangible assets and assets held for sale - net....	1,860	474
Income received for the relocation of our own network.....	796	901
Other	2,384	1,886
Total.....	5,040	3,261

23 INTEREST INCOME

	2020	2021
Interest income on loans and receivables.....	295	326
Unwinding of the interest component of provisions	362	-
Interest income from leases	445	289
Total.....	1,102	615

24 INTEREST EXPENSES

	2020	2021
Interest expense payable on loans to related parties.....	3,246	1,078
Other interest expense	3,589	6,439
Interest expense on lease liabilities	5,396	5,696
Accretion / interest on provisions	168	654
Borrowing costs capitalized	(209)	(157)
Total.....	12,190	13,710

Borrowing costs include interest and other costs that the Company incurs in connection with the borrowing of funds. Borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying asset form part of the cost of that asset. The borrowing costs eligible for capitalization of general borrowings that are used for the purpose

of obtaining qualifying assets are capitalized applying the weighted average of the borrowing costs applicable to the general borrowings of the Company that are outstanding during the period. For further information see Note 2.1.1. A qualifying asset is an asset that necessarily takes a substantial period of time, in general over 12 months, to get ready for its intended use. Other borrowing costs are recognized as an expense.

Total Interest expenses are shown net of borrowing costs capitalized using average borrowing rates of 0.47%-1.14% in 2021 (2020: 0.92%-1.59%). When calculating the borrowing rates, Other finance expenses (included in Note 25) are also considered.

25 OTHER FINANCE EXPENSES – NET

	2020	2021
Net foreign exchange losses / (gains) on financial instruments	25,582	1,219
Other net foreign exchange losses / (gains).....	4,223	692
Fee expense	4,730	4,923
Losses / (gains) on the subsequent measurement of financial assets fair value through profit and loss (other than derivatives)	38	11
Losses / (gains) on the subsequent measurement of financial liabilities at fair value through profit and loss (other than derivatives)	9	14
Losses/(gains) on the subsequent measurement of derivatives contracted with related parties	(19,663)	3,988
Losses/(gains) on the derecognition of derivatives contracted with related parties	(2,441)	(10,960)
Total	12,478	(113)

The high amount of Losses / (gains) on the subsequent measurement of derivatives contracted with related parties in 2020 was mainly due to the significant weakening of HUF exchange rates. During 2021 the market condition changes are different, as HUF exchange rate has lower volatility and strengthened against EUR, however the HUF interest rates are growing continuously, furthermore in 2021 the volume of derivatives was different. The realized gains on the derecognition of derivatives contracted with related parties are higher in 2021, which is mainly due to expiring of two Cross Currency Interest Rate Swap deals.

26 RESULTS OF INVESTMENTS

26.1 Results of investments in subsidiaries

Dividends receivable by the Company are recognized as a receivable and income in the period in which the dividends are approved by the general meeting of the investees.

The following table shows dividends received from the Company's investments related to years 2020 and 2021:

	2020	2021
Stonebridge A.D.	4,938	4,085
Investel Kft.	-	1,000
Other	3,734	643
Total	8,672	5,728

26.2 Results of investments in associated companies and joint ventures

The Company lost the joint control and significant influence over E2 Hungary Zrt. in February 2020 (see Note 11).

27 EARNINGS PER SHARE (EPS)

Basic earnings per share is calculated by dividing profit attributable to the owners of the Company for the period by the weighted average number of common stocks outstanding. All figures are presented in the Statements of profit or loss and other comprehensive income.

There was no transaction resulting dilutive shares in the reported periods therefore the presented basic and diluted EPS are equal in 2020 and 2021.

The Company is subject to preparation of a consolidated annual report so disclosures related to the EPS indicator (based on IAS 33) are shown based on consolidated financial statements.

28 PURCHASE OF PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS

The table below shows the reconciliation of investments in property, plant and equipment and intangible assets and the cash payments made for these investments. Capitalized borrowing costs are included in the Investments in PPE and intangible assets, where applicable.

		12.31.2020	12.31.2021
Investments in property, plant and equipment (Note 9).....		72,722	66,274
Investments in Right-of-use assets.....	(a)	41,785	24,230
Investments in intangible assets (Note 10).....		108,153	104,692
Total investments in PPE and intangible assets.....		222,660	195,196
Capitalized asset-related grant	(b)	1,313	(1,279)
Capitalized frequency fee payable.....	(c)	(37,343)	(83,075)
Change in Right-of-use assets		(43,875)	(24,230)
Change in trade payables relating to capital expenditures	(d)	(6,984)	3,338
Recognition / (Derecognition) of investment tax credit.....	(e)	2,752	2,393
Cash payments for purchases of PPE and intangible assets		138,523	92,343

(a) For further information, please see Notes 9.2, 17.

(b) In 2021 HUF 1,287 million is paid by the government. It is presented in Notes 4.2.3.2 and see also Notes 9 and 14 for government grants relating to the purchase of PPE.

(c) The present value of the frequency fees is capitalized as part of the intangible asset (Licenses) if the future payments can be reliably estimated, however, these fees are paid in cash in subsequent periods. The cash payments on the discounted liability are included in the Repayment of lease and other financial liabilities line of the Financing cash flow, while the interest payments accruing on the discounted liability are included in the Interest and other financial charges paid line of the Operating cash flow. The significant license acquisitions are described in Notes 10.5 and 34.2.

(d) Change in payables relating to capital expenditures includes the effect that the actual cash settlement of the vendor invoices is made subsequent to the recognition of the investment.

(e) For further information see Note 6.

29 PURCHASE OF SUBSIDIARIES

There were no payments on acquisitions considered as a subsidiary or a business combination in 2020 and 2021.

30 CONTINGENT ASSETS AND LIABILITIES

30.1 Contingent assets

A contingent asset is a possible asset that arises from past events and whose existence will be confirmed only by the occurrence of uncertain future events not within the control of the Company. These assets are not recognized in the statements of financial position.

The Company has no contingencies where the inflow of economic benefits would be probable and material.

30.2 Contingent liabilities

No provision is recognized for contingent liabilities. A contingent liability is a possible obligation that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events (excluding executory contracts) not wholly within the control of the Company; or a present obligation that arises from past events but is not recognized because it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation or the amount of the obligation cannot be measured with sufficient reliability.

The most significant contingent liabilities of the Company are described below. No provisions have been recognized for these cases, as management estimates that it is unlikely that these claims originating from past events would result in any material economic outflows or the amount of the obligation cannot be measured with sufficient reliability.

30.2.1 Guarantees

Magyar Telekom is exposed to risks that arise from the possible drawdown of guarantees, for which see more details in Note 4.5.4.

31 PURCHASE COMMITMENTS

31.1 Property, plant and equipment and intangible assets

The table below summarizes Magyar Telekom's contractual purchase commitments for property, plant and equipment and intangible assets with the majority falling due within two years.

	12.31.2020	12.31.2021
Property, plant and equipment.....	808	739
Intangible assets	4,012	3,725
Total.....	4,820	4,464

31.2 Investments

As at December 31, 2021 and 2020 the Company had no committed business combinations.

32 RELATED-PARTY TRANSACTIONS

Related parties of the Company include legal entities and persons that are related to the Company.

A person or a close member of that person's family is related to the Company if that person:

- has control or joint control of the reporting entity;
- has significant influence over the reporting entity; or
- is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

An entity is related to a reporting entity if any of the following conditions apply:

- The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
- One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
- Both entities are joint ventures of the same third party.
- One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
- The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
- The entity is controlled or jointly controlled by a person related to the entity or such a person holds a key position in the reporting entity.
- The entity, or any member of a group of which it is a part, provides key management personnel services to the reporting entity or to the parent of the reporting entity.

The transactions with related parties are priced at arm's lengths basis, if the conditions are met.

32.1 Related-party transactions in the Statements of financial position

The tables below summarize the carrying amount of assets and liabilities arising from the significant transactions with related parties as of December 31, 2020 and 2021:

12.31.2020	Trade receivables	Other receivables (advances)	Loans given	Swap receivables	Lease receivables	Loans received	Lease liabilities	Dividends payables
Parent.....	2,300	-	19,768	20,696	-	(89,675)	-	(12,454)
Subsidiaries	3,035	39	4,423	-	5,249	(11,218)	(8,246)	-
Associates and joint ventures.....	1	-	-	-	-	-	-	-
Other related parties (a)	1,796	301	-	-	-	(98,058)	1	-
Total	7,132	340	24,191	20,696	5,249	(198,951)	(8,245)	(12,454)

12.31.2021	Trade receivables	Other receivables (advances)	Loans given	Swap receivables	Lease receivables	Loans received	Lease liabilities	Dividends payables
Parent.....	1,658	11	-	16,715	-	(128,445)	-	(9,262)
Subsidiaries	1,596	154	3,023	-	4,994	(8,432)	(8,570)	-
Associates and joint ventures.....	-	-	-	-	-	-	-	-
Other related parties (a)	1,470	47	-	-	-	27	-	-
Total	4,724	212	3,023	16,715	4,994	(136,850)	(8,570)	(9,262)

(a) A significant part of Other related parties is related to DTIF.

No impairment was recognized for receivables from related parties in the reported years.

Lease receivables include the lease of a part of the Magyar Telekom headquarters to T-Systems Magyarország Zrt.

32.2 Related-party transactions in the Statements of profit or loss and other comprehensive income

The tables below summarize the significant transactions with related parties as of December 31, 2020 and 2021:

12.31.2020	Revenue from services	Cost of services	Dividend received	Interest expense	Swap	FX loss/gain	Dividend paid
Parent.....	3,298	(5,177)	-	(1,438)	22,110	(10,604)	(12,454)
Subsidiaries.....	4,950	(13,783)	8,671	(402)	(6)	-	-
Associates and joint ventures.....	29	(716)	-	-	-	-	-
Other related parties (a)	8,261	(9,436)	-	(1,706)	-	(9,311)	-
Total.....	16,538	(29,112)	8,671	(3,546)	22,104	(19,915)	(12,454)

12.31.2021	Revenue from services	Cost of services	Dividend received	Interest expense	Swap	FX loss/gain	Dividend paid
Parent.....	4,225	(6,116)	-	(455)	6,972	(1,348)	(9,262)
Subsidiaries.....	4,549	(12,730)	5,728	(482)	-	(46)	-
Associates and joint ventures.....	2	-	-	-	-	-	-
Other related parties (a)	8,014	(9,966)	-	(487)	-	1,045	-
Total.....	16,790	(28,812)	5,728	(1,424)	6,972	(349)	(9,262)

(a) A significant part of Other related parties is related to DTIF.

32.3 Transactions with Deutsche Telekom Group and the Federal Republic of Germany

32.3.1 Deutsche Telekom Group

Deutsche Telekom AG is the ultimate (indirect) controlling owner of Magyar Telekom, holding 59.21% of the Company's shares. Deutsche Telekom Group has a number of fixed-line, mobile and IT service provider subsidiaries worldwide, with whom Magyar Telekom has regular transactions.

Deutsche Telekom International Finance B.V. (DTIF) the subsidiary of DTAG is the treasury center of DT Group, which typically provides loan financing across the DT Group including Magyar Telekom as an intercompany partner.

32.3.2 The Federal Republic of Germany

The Federal Republic of Germany is both a direct and an indirect shareholder and holds approximately 32 percent of the share capital of DT AG. Due to the average attendance at the shareholders' meetings, the Federal Republic of Germany represents a solid majority at the shareholders' meetings of DT AG, although it only has a minority shareholding, making DT AG a dependent company of the Federal Republic. Therefore, the Federal Republic and the companies controlled by the Federal Republic or companies over which the Federal Republic can exercise a significant influence are classified as related parties of DT AG, and consequently of Magyar Telekom as well.

DT AG and Magyar Telekom did not execute, as part of its normal business activities, any transactions that were individually material in the 2021 or 2020 financial year with companies controlled by the Federal Republic or companies over which the Federal Republic can exercise a significant influence.

32.4 Board and Supervisory Board members

	12.31.2020	12.31.2021
Remuneration of the members of the Board of Directors	28	22
Remuneration of the members of the Supervisory Board	44	37
Loans granted to the members of the Board of Directors	-	-
Loans granted to the members of the Supervisory Board	-	-

32.5 Key management personnel

Key management has been identified as the members of the Company's Chief Officers. The Chief Executive Officer (CEO) and the other Chief Officers (Chief Officers) together fulfill the Chief Operating Decision Maker (CODM) function in the Company.

The table below shows, in total, the compensation expenses (including social security and other payroll-related taxes) incurred by the Company in relation to the key management.

	12.31.2020	12.31.2021
Salaries and other employee benefits	712	1,152
Contractual termination expense	150	-
Share-based payments (Note 20)	24	20
	886	1,172
Costs expensed in relation to defined contribution plans (including social security contribution)	152	157

The Company did not provide loans or guarantees to its key management.

32.6. Guarantees provided by the Company for liabilities of related parties and guarantees provided by related parties for liabilities of the Company

32.6.1 Bank guarantees

Bank guarantees for subsidiaries issued by Magyar Telekom in the name of the subsidiaries and it pays the related fees for the bank. In the case of guarantee drawdown the Magyar Telekom's bank account shall be debited with the amount drawdown/paid. Fees paid by Magyar Telekom reinvoiced within the group.

The following table presents the guarantees provided by the Company for liabilities of related parties:

Type of the guarantee	31.12.2020	31.12.2021
Bank guarantee	1,731	1,726

For further information see Note 4.5.4.

33 REPORTABLE SEGMENTS AND INFORMATION ABOUT GEOGRAPHICAL AREAS

33.1 General information

The Group's segments are reported in a manner consistent with the internal reporting provided to the CODM, the key management of Magyar Telekom Plc. The CODM of Magyar Telekom is responsible for allocating resources to, and

assessing the performance of, the operating segments on a monthly basis. The Chief Officers assess the performance of the Company and make their decisions.

Magyar Telekom's operating segments are: MT-Hungary and North Macedonia.

Magyar Telekom operates in Hungary providing mobile and fixed-line telecommunications and TV distribution services to millions of residential and small businesses customers mainly under the "Telekom" or "T" brand. Magyar Telekom is also responsible for the wholesale mobile and fixed-line services in Hungary and performs strategic and cross-divisional management and support functions including Procurement, Treasury, Real estate, Accounting, Tax, Legal, Internal Audit and similar shared services and other central functions of the Company. For details on revenue please refer to Note 18.

33.2 Information about geographical areas

Considering that Magyar Telekom provides its services within the boundaries of Hungary and the base of geographical classification is the headquarters of the Company, all the realized revenue by the Company is in the category of Hungary. In a similar manner all tangible assets of the Company are classified as Hungary considering geographical areas.

33.3 Information about revenue for group of products and services

Revenue from customers for group of similar products and services is disclosed in Note 18.3.

33.4 Information about revenue from major customers

None of the Company's customers represent a significant source of revenue. Revenue from transactions with a single external customer (or group of entities that – knowingly to us – are under common control of a third party or government) do not exceed 10 per cent of the Company's revenue.

34 REGULATED MARKETS AND PROCEDURES

Magyar Telekom's primary activities are the fixed-line and mobile operations in Hungary. These services are regulated by European and Hungarian legislation.

The most important features of the regulation of these services are described below.

The regulation of the Hungarian telecommunications markets is primarily based on Act C of 2003 on Electronic Communications (Eht.) and the decrees issued by the President of the National Media and Communications Authority (NRA). The NRA is an independent regulatory body which, in addition to its law enforcement activities, also legislates on the basis of legal authority.

Hungary implemented Directive 1972/2018 / EU (EECC) partially by December 21, 2020 (with Section 16 of the Electronic Communications Act being applicable June 30, 2021). The EECC regulates fix and mobile call termination rates in the whole EU/EEA by a Delegated Act, but the legal framework for formerly regulated markets remains largely unaffected by the EECC.

34.1 Access regulation

Regulated markets are governed by EU Commission's recommendations. Paralel to the EECC, the Commission produced a new recommendation replacing Recommendation 2014/710 / EU: 2020/2245/EU. The new recommendation only covers two markets:

- Wholesale access for mass-market products
- Wholesale high-quality access at a fixed location

National NRA's, nonetheless, have the power to diverge from this recommendation. The former Hungarian regulation designates 4 regulated markets, Magyar Telekom is currently designated as an SMP operator (a service provider with significant market power) on all of these.

M1: With regards the fix networks' regulated interconnection (M1) the NRA published its fifth-round market analysis procedure's resolution on May 15, 2018. The resolution's FTR (fix termination rate) proposal - that is based on a pure BU-LRIC model - is 0.26 HUF/min. The new fee had to be applied symmetrically with an effect from end of the second quarter

of 2018 altogether for 144 operators. Previous regulation of fix origination, also carrier selection and call-by-call obligation was terminated with this last resolution.

The latest MARIO and supplementary interconnection service fees came into force on January 1, 2020.

M2: The Company is designated as an SMP operator (a service provider with significant market power) in the mobile wholesale call termination market and subject to regulatory obligations regarding the termination charge of calls into its network, mobile termination rate (MTR). The last mobile market resolution was published in two folds: one resolution only contains the SMP designation, with the obligations, such as the n MTR of 1.71 HUF/min net cost-based fee remaining untouched, while with regards to obligations, the NRA delivered a separate resolution.

M3: Magyar Telekom is Hungary's leading fixed-line broadband service provider in the wholesale market and one of the leading ones in the retail market. In accordance with the effective resolution, all retail fixed products shall be 'reproducible' by competitors based on the wholesale service. Consequently, the full retail portfolio shall have a wholesale equivalent. Previous regulation defined a retail minus price setting.

The NRA published the latest *resolutions* with regards to markets 3a (M3a) and 3b (M3b) on December 15, 2017. SMP operators are obliged to prepare reference unbundling offer for access to (physical) passive network infrastructure (RUO) and to provide these services when there is a request for them by other telecommunications service providers. The reference offer of each SMP operator must be approved by the NRA. The latest market resolution introduced the geographical segmentation, thus relieving the company of obligations in certain competing settlements. Magyar Telekom was designated as an SMP in both 3a and 3b markets. Service fee calculation for all relevant regulated services – both markets 3a (resolution PC/17915-66/2017.) and 3b (resolution PC/17920-66/2017.) - are with a BU-LRIC+ model. New fees had to be applied as of January 1, 2019.

As a novelty the geographically segmented regulation was implemented with the last resolution. As a result, in those settlements where competition bases, Magyar Telekom's SMP was withdrawn. In the M3a resolution a new service obligation has been introduced, the L2-WAP (Layer 2 Wholesale Access Service) obligation. The NRA has published the latest reference unbundling offer – containing the L2WAP service – through its resolution PC/16593-31/2018. on November 6, 2019. The revised reference offer entered into force on December 1, 2019. The L2-WAP service is to be offered six months after the entry into force of the revised reference offer, i.e. June 1, 2020.

M4: In the high-quality broadband market (M4) the NRA published its resolution (PC/12186-44/2018.) on February 27, 2019. Magyar Telekom has been designated as the SMP for the "Ethernet leased line termination segment service". According to the resolution Magyar Telekom is subject to SMP obligations throughout Hungary, providing high-quality access at a regulated cost-based price.

34.2 Spectrum procedures

In June 2012, the Hungarian Parliament adopted the modification of the Electronic Communications Law extending the scope of competence and tasks of the NRA. Pursuant to the amendment, all spectrum-related issues are dealt with by the NRA.

On December 7, 2004, the Company obtained the spectrum usage right of certain frequency blocks in the 2100 MHz band for the deployment and operation of an IMT2000/UMTS mobile telecommunications system (3G system). The duration of the spectrum license was 15 years (until December 7, 2019) that was extended for another 7.5 years in December 2018 for a one-time fee of HUF 11 billion.

The Company won a tender for a spectrum usage right for a 26 GHz block on April 30, 2009. On May 14, 2012 the NRA granted spectrum license to Magyar Telekom for four pieces of basic spectrum blocks (4 x 2 x 28 MHz each) in the 26 GHz band. Furthermore, Telekom acquired GTS Hungary Ltd's two blocks in the 26 GHz band for HUF 114.6 million HUF net, and has a usage right for it from November 1, 2016. Blocks purchased in 2009 were extended in 2018.

The Company filed an auction bid in December 2011 with the NRA for the right of use of unused spectrum in the 900 MHz frequency band, related to the provision of mobile telecommunications services. The spectrum can be utilized in a technology-neutral manner. The NRA announced its first-instance decision on the result of the 900 MHz auction (Auction) on January 30, 2012. Magyar Telekom won the right of use of two duplex frequency blocks of 1 MHz each for a period of 15 years.

On September 6, 2013 Magyar Telekom and the NRA signed the modification of the Authority Contract on the use of the 900 MHz and 1800 MHz frequency bands. The main stipulations of the modification are the following:

On May 22, 2014, the NRA published the “Documentation for the tender announced in the subject of spectrum licenses for broadband services”. Blocks in 800 MHz / 900 MHz / 1800 MHz / 2600 MHz and 26 GHz frequency bands were auctioned.

On September 29, 2014 the NRA published the tender results so that Magyar Telekom acquired the following frequencies for an aggregate amount of HUF 58,650 million:

- 2 x 10 MHz in 800 MHz
- 2 x 2 MHz in 900 MHz
- 2 x 30 MHz in 2600 MHz
- 2 x 10 MHz in 1800 MHz.

On October 15, 2014 Magyar Telekom and the NRA signed the Authority Contract on the use of the 800MHz, 900 MHz and 1800 MHz frequency bands that came into force right on that day. For the new bands the frequency license and radio permission were issued on October 17, 2014 to Magyar Telekom.

As a result of the last tender Magyar Telekom acquired frequency usage rights in the above listed spectrums till June 15, 2029. The Authority Contract can be extended another five years if all requirements defined in the contract are met.

On July 18, 2019, the NRA published the “Documentation for the auction announced in the subject of spectrum licenses for 5G services”. Blocks in the 700 MHz / 2100 MHz / 2600 MHz and 3600 MHz frequency bands were auctioned.

On March 26, 2020 the NRA published the bidding results of the auction so that Magyar Telekom acquired the following frequencies for HUF 54,240 million:

- 2 x 10 MHz in 700 MHz
- 2 x 10 MHz in 2100 MHz
- 1 x 120 MHz in 3600 MHz.

As a result of the auction Magyar Telekom acquired frequency usage rights in the above-listed spectrums till April 3, 2034. The usage rights can be extended another five years if all requirements defined in the documentation are met.

On October 16, 2020, the NRA published the “Documentation for the auction announced in the subject of spectrum licenses for 900 MHz and 1800 MHz bands”. Usage rights shall be valid for 15 years starting from April 2022 and might be extended another five years if all requirements defined in the documentation are met. Magyar Telekom submitted its participation request on November 10, 2020. Six lots of 2 x 5 MHz blocks were sold in the 900 MHz band, and 12 lots of 2 x 5 MHz blocks were sold in the 1800 MHz band.

Magyar Telekom acquired 2 x 8 MHz in the 900 MHz spectrum band while 2 x 20 MHz in the 1800 MHz spectrum band.

34.3. Universal services

Universal services are basic communications services (including access to communication services at a fixed location, public payphones, directory and directory enquiry services) that should be available to all customers at an affordable price. The NRA published its request for voluntary universal service provisioning on January 19, 2018. MT did not bid on any parts of the universal services, so the NRA designated MT to offer the following universal services from January 1, 2019: public payphones, access on fixed location and for national directory enquiry service. As a result of the procedure MT lost two primary areas to serve (Szekszárd – nr74 and Paks – nr75) and received a new one (Szeged - nr62).

The EECC brings a new framework in universal services as well – MT will likely be able to let go of some of the obscure obligations of the past, while Hungary will have to ensure affordable and available internet access to consumers. This obligation is still to be investigated by the NRA.

34.4. End-user rights

Since June 30, 2007, an EU regulation has been regulating international roaming tariffs for wholesale and retail customers on the basis of a price cap system. The first EU roaming regulation prescribed a glide-path that mandated annual reductions of wholesale and retail prices. (EU Roaming Regulation I.)

As of July 2009, the EU also introduced regulated tariffs for SMS and data roaming similarly to the regulation of voice roaming. (EU Roaming Regulation II.)

As of July 1, 2012, the EU further broadened the European roaming regulation with a new regulatory measure: separate sales of regulated roaming services. As a result, Magyar Telekom had to implement the technical possibility to host an Alternative Roaming Provider in its network and also it allows its own customers to use Local Break-out solutions within the EU offered by a foreign EU member country's mobile operator from July 1, 2014. (EU Roaming Regulation III.)

The actual EU roaming regulation - "Full Roam Like At Home With Fair Use Policy Possibility" - is applied from June 15, 2017. (EU Roaming Regulation IV.). As a result, European retail roaming price levels for voice, SMS and data are equal to domestic prices since summer 2017. The Commission implementing regulation (EU) 2016/2286 of 15 December 2016 laid down detailed rules on the application of fair use policy and on the methodology for assessing the sustainability of the abolition of retail roaming surcharges and on the application to be submitted by a roaming provider for the purposes of that assessment.

In addition, the Company has implemented, by the required deadline of May 15, 2019, Regulation (EC) No 2018/1971 of the European Parliament and of the Council supported by BEREC and BEREC Office, and according to the modified Regulation (EU) 2015/2120, taking into account the withdrawal decision of regulation 1211/2009/EC regulation, the reduction of charges for international calls and SMSs to member states of the European Union.

The EECC affected all customer relations of MT – we prepared for compliance with serious IT-developments as well as changes in our processes.

35 EVENTS AFTER THE REPORTING PERIOD

There were no significant events after the reporting period.

Budapest, February 23, 2022



Tibor Rékasi
Chief Executive Officer, Board member



Daria Aleksandrovna Dodonova
Chief Financial Officer, Board member



MAGYAR TELEKOM TELECOMMUNICATIONS
PUBLIC LIMITED COMPANY

BUSINESS REPORT

FOR THE YEAR ENDED DECEMBER 31, 2021



INTRODUCTION

The Company's activities are described in Note 34 of the Financial Statements, while the business report provides additional information on the following topics:

- SUMMARY ON 2021 OPERATIONS
- THE COMPANY'S SHARE CAPITAL, VOTING RIGHTS AND TRANSFER OF SHARES
- CORPORATE GOVERNANCE
- SOCIAL COMMITMENTS, LABOR STANDARDS, HUMAN RIGHTS
- COMPENSATION OF MEMBERS OF THE BOARD OF DIRECTORS, SUPERVISORY BOARD, AND MANAGEMENT
- RESEARCH AND DEVELOPMENT
- REAL ESTATE, SITES OF OPERATION
- SUSTAINABILITY
- ENVIRONMENT PROTECTION
- CORPORATE COMPLIANCE
- ECONOMIC ENVIRONMENT AND OUTLOOK
- INTERNAL CONTROLS, RISKS AND UNCERTAINTIES
- ANALYSIS OF FINANCIAL RESULTS FOR 2021
- EVENTS AFTER THE REPORTING PERIOD

SUMMARY ON 2021 OPERATIONS

Since the Company is the parent company of Magyar Telekom Group, therefore the Summary on 2021 operations related to Magyar Telekom Group is presented below.

Financials

Magyar Telekom delivered revenue and EBITDA AL results overperforming the targets communicated for 2021 thanks to the improving operating environment coupled with the successful monetization of our quality networks and appealing service offerings. Group revenue rose by 4.0% year-on-year to HUF 700.1 billion and EBITDA AL reached HUF 216.3 billion representing a 6.7% increase year-on-year.

We recorded a 4.1% rise in our investments in 2021, CAPEX after lease excluding spectrum licenses grew to HUF 109.3 billion, reflecting the further acceleration in network related investments to meet customer demand. As a result of that and some unfavorable changes in working capital development, cash flow excluding spectrum licenses amounted to HUF 56.2 billion in 2021.

Network

In 2021, we continued our flagship investments in Hungary which aim to provide our customers with an outstanding network that they require and appreciate, whether they are at home or on the move.

Thanks to our fiber rollout program and the highest ever annual expansion of over 440 thousand further gigabit capable access points, we were able to provide gigabit speed at more than 3 million access points in Hungary by the end of the year. This translates to over two-thirds of our fixed infrastructure, with over 1 million customers choosing to connect via gigabit technology to our fixed network.

We also proceeded with the comprehensive 3-year mobile radio network modernization project, allowing us to meet the surging mobile data demand as well as to steadily expand 5G coverage, reaching over 10% based on the Hungarian population by the end of 2021.

Magyar Telekom also secured critical spectrum on the 900 and 1800 MHz frequency bands in 2021, a significant milestone which will allow our customers to continue to enjoy superior mobile services and innovative solutions going forward.

Customers

Our efforts to provide outstanding infrastructure are reflected in the continued positive momentum in our customer base: fixed broadband subscriber base expanded by 7% and by now one out of four broadband customers is subscribed to a Gigabit speed. On the mobile side, we recorded the highest data traffic ever, whilst the average monthly mobile data usage per customer rose by over 30% year-on-year, supporting value creation.

Furthermore, the excellent service and tailor-made solutions to our customers, were reflected in the continued increase in customer satisfaction, reflected also in the improvement of Magyar Telekom's TRIM index scores measured among residential and SOHO customers.

Resilience

We also progressed with the implementation of internal efficiency measures, which have in combination with our digitization agenda positioned us well to generate higher profitability and reinforce our resilience to external challenges that may result from our rapidly changing environment.

We received further recognition of these efforts and progress by Scope Rating, which has affirmed our BBB+ issuer credit rating with a stable outlook, and specifically emphasized the Company's strong market position and resilient operational structure.

The results of Magyar Telekom's latest sustainability cycle spanning the 2016-2020 period were presented, detailing our strategy with respect to digital sustainability, climate protection, equal opportunity and diversity. In addition, Magyar Telekom's position as a constituent of the FTSE4Good Index Series was confirmed following an index review, receiving a 99 percentile rank in the telecommunications investment universe.



1 THE COMPANY'S SHARE CAPITAL, VOTING RIGHTS AND TRANSFER OF SHARES

As of December 31, 2021, the share capital of Magyar Telekom Plc. was HUF 104,274,254,300, consisting of 1,042,742,543 Series "A" dematerialized ordinary shares. All Series "A" ordinary shares have a nominal value of HUF 100. Rights and obligations related to Series "A" ordinary shares are described in detail in Section 4 of the Articles of Association (http://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents).

Information concerning our ownership structure as of December 31, 2021 is described in the following table:

Shareholder	Number of shares	Percentage of share capital
Deutsche Telekom Europe B.V.....	617,436,759	59.21
Publicly traded.....	379,528,245	36.40
Treasury shares.....	45,777,539	4.39
	1,042,742,543	100.00

Deutsche Telekom Europe B.V. owning 61.93% of the Company's voting rights is a member of the Deutsche Telekom Group. The ultimate controlling parent of Magyar Telekom is Deutsche Telekom AG (DT or DT AG).

Deutsche Telekom Europe B.V. does not have different voting rights than our other shareholders and, as with our other shareholders, Deutsche Telekom Europe B.V. is entitled to one vote per each ordinary share that it owns.

1.1 Voting Rights and Voting

The holder of each Series "A" ordinary share shall be entitled to one vote at the General Meeting of the Company. The names of shareholders and nominees who intend to participate at the General Meeting shall be registered in the Share Register on the second working day prior to the starting date of the General Meeting. The General Meeting shall adopt its resolutions by a simple majority vote except for resolutions on issues listed in the Articles of Association, which shall require at least a three-quarters majority of the votes cast. There is no limitation on the rights of non-resident or foreign shareholders to hold or exercise voting rights on the ordinary shares. There is no limitation of voting rights for ordinary shares in the Articles of Association. The Company has no shares assigned with special management rights.

1.2 Transfer of Shares

For the transfer of dematerialized shares, a contract for transfer or other legal title is required and, in that context, the transferor's securities account shall be debited and the new holder's securities account shall be credited with the transferred dematerialized shares. The holder of dematerialized shares shall be considered the holder of the securities account on which the dematerialized shares are recorded.

The transfer of any Series "A" ordinary shares is not bound to any restriction or attainment of agreement.

2 CORPORATE GOVERNANCE

2.1 Annual General Meeting

The General Meeting has the exclusive right to approve and amend the Articles of Association (section 5.2. (a)) unless otherwise provided by law or the Articles of Association. According to the Articles of Association, the Board of Directors is entitled to make decisions regarding any change in the registered seat, sites, branch offices and – except for the main activity – the scope of activities of the Company and in relation to this, to modify the Articles of Association (section 6.4.(p)).

2.2 Board of Directors

The Board of Directors operates based on its Rules of Procedure (https://www.telekom.hu/about_us/investor_relations/corporate_governance/board_of_directors).

The Board of Directors is responsible for all matters relating to the Company's management and course of business not otherwise reserved to the General Meeting or to other corporate bodies by the Articles of Association or by the laws. The Board of Directors draws up, at the end of each business year, a report for the General Meeting and quarterly to the Supervisory Board on the management of the Company, the assets of the Company, the financial situation of the Company and the business policy of the Company.

The rules of competence regarding the capital increase and purchase of treasury shares are detailed in Sections 5.2 (b) and (p) as well as 6.4. (l) and (m) of the Articles of Association. The Board of Directors¹ with its Resolution No. 2/5 (04.16.2021) adopted an authorization to purchase Magyar Telekom ordinary shares for 18 months starting from the date of approval of the resolution. The relevant resolution is available on the General Meetings section of the Company's website.

Pursuant to the Articles of Association, the Board of Directors consists of a minimum of five and a maximum of eleven members elected by the General Meeting for a term of three years, unless otherwise provided by the General Meeting. On December 31, 2021, there were eight members of the Board of Directors.

Meetings of the Board of Directors are held at least four times a year. Meetings of the Board of Directors require the presence of at least the majority of the members for a quorum. Each member of the Board of Directors has one vote. The Board of Directors passes resolutions by a simple majority vote.

On December 31, 2021, members of the Board of Directors, their principal occupation and the years of their original election were as follows:

Name	Born	Principal Occupation	Member since
Dr. Robert Hauber.....	1971	Senior Vice President Finance & Performance Management Europe, DT AG, Chairperson of the Board of Directors of Magyar Telekom Plc.	2017
Daria Aleksandrovna Dodonova	1976	Chief Financial Officer of Magyar Telekom Plc.	2020
Gábor Fekete.....	1950	Consultant	2020
Ralf Nejedl.....	1970	Senior Vice President B2B Europe, Deutsche Telekom AG	2016
Frank Odzuck	1959	Chief Executive Officer of Zwack Unicum Plc.	2006
Péter Ratatics	1982	Chief Operating Officer of MOL	2019
Tibor Rékasi.....	1973	Chief Executive Officer of Magyar Telekom Plc.	2018
Éva Somorjai-Tamássy.....	1966	Senior Vice President Special Transformation Projects Europe, Deutsche Telekom AG	2019

The members' assignment lasts until May 31, 2022.

¹ Based on Government Decree no. 502/2020. (XI. 16.) the Board of Directors of the Company decided in the matters set on the published agenda of the Annual General Meeting.

2.3 Management

As part of the corporate governance simplification initiative, the Board of Directors of Magyar Telekom resolved to cease the activity of the Management Committee established in 2000 as a formal corporate decision-making body with effect from January 1, 2020. The tasks and responsibilities of the Management Committee have been re-allocated to the Chief Officers and to the Board of Directors of the Company. As a result of this change, the Management Committee transformed into an agile „Leadership Squad”.

On December 31, 2021, the members of the Management and the years of their original election were as follows:

Name	Born	Current position	Member since
Tibor Rékasi	1973	Chief Executive Officer of Magyar Telekom Plc.	2013
Daria Aleksandrovna Dodonova	1976	Chief Financial Officer	2020
Melinda Szabó	1971	Chief Commercial Officer	2018
Zsuzsanna Friedl	1977	Chief People Officer	2017
Gábor Gonda	1976	Chief Commercial Officer Enterprise, Chief Executive Officer of T-Systems Hungary Ltd.	2020
Lubor Zatko	1974	Chief Technology and IT Officer	2019

2.4 Supervisory Board

The Supervisory Board carries out its activities based on its Rules of Procedure (https://www.telekom.hu/about_us/investor_relations/corporate_governance/supervisory_board).

The Supervisory Board shall examine all submissions to be submitted to the General Meeting and present its opinion thereof at the General Meeting. The General Meeting may pass a resolution on a report pursuant to the Accounting Act and the use of the profit after income tax only upon receipt of the written report of the Supervisory Board. The Supervisory Board makes a proposal directly to the General Meeting regarding the election, remuneration and removal of the Statutory Auditor.

Pursuant to the Company’s Articles of Association, the Supervisory Board consists of five members (three independent members and two employee representatives) elected by the General Meeting for a term of three years, unless otherwise provided by the General Meeting. The employee representatives in the Supervisory Board shall be nominated by the Central Workers’ Council. Meetings of the Supervisory Board have a quorum if two-thirds of the elected members but at least three members are present.

On December 31, 2021, the members of the Supervisory Board, their principal occupation and the years of their original election were as follows:

Name	Born	Principal Occupation	Member since
Prof. Dr. Attila Borbély.....	1951	Professor Emeritus of University of Debrecen, Faculty of Economics and Business, Chairperson of the Supervisory Board of Magyar Telekom Plc.	2020
Krisztina Dorogházi.....	1972	Senior Vice President Chief Accounting Officer and Controller, TechnipFMC	2020
Tamás Lichnovszky.....	1962	Expert, People Unit, Magyar Telekom Plc.	2010
András Szakonyi.....	1973	Senior Vice President - Europe, Middle East and Africa, Iron Mountain	2020
Zsoltné Varga	1969	Chairwoman of the Central Functions Workers Council, Magyar Telekom Plc.	2008

The members’ assignment lasts until May 31, 2022.

2.5 Audit Committee

The Audit Committee operates based on its Rules of Procedure (https://www.telekom.hu/about_us/investor_relations/corporate_governance/audit_committee).

The members of the Audit Committee have been elected by the General Meeting from the independent members of the Supervisory Board for the same period as their membership in the Supervisory Board.

On December 31, 2021, the members of the Audit Committee were as follows:

- Prof. Dr. Attila Borbély
- Krisztina Dorogházi
- András Szakonyi

2.6 Remuneration and Nomination Committee

The Remuneration and Nomination Committee is established by the Board of Directors of the Company to support the Board of Directors of the Company regarding the remuneration and certain nomination related issues of the members of the corporate bodies and the top executives of the Company in accordance with its Rules of Procedure (https://www.telekom.hu/about_us/investor_relations/corporate_governance/compensation).

The Remuneration and Nomination Committee, among others, makes recommendations to the Board of Directors on the establishment and/or termination of employment, and the modification of the employment contract of the Chief Executive Officer and the Chief Officers, and defines the remuneration of the Chief Executive Officer and the Chief Officers of the Company.

The Remuneration and Nomination Committee consists of three members. The members are elected by the Board of Directors from among its members. The Remuneration and Nomination Committee holds at least two meetings each year.

On December 31, 2021, the members of the Remuneration and Nomination Committee were as follows:

- Dr. Robert Hauber
- Ralf Nejedl
- Frank Odzuck

2.7 Corporate Governance and Management Report

Magyar Telekom Plc. is a public limited company listed on the Budapest Stock Exchange. In 2004, the Budapest Stock Exchange issued its Corporate Governance Recommendations (the Recommendations) containing recommendations related to the corporate governance practice of companies listed on the Budapest Stock Exchange, taking account of the most commonly used international principles, of experiences gathered in Hungary, and of the characteristics of the Hungarian market as well as the Companies Act. The Recommendations were updated in 2007, 2008, 2012, 2018 and in 2021. The Recommendations effective from time to time is available at the website of the Budapest Stock Exchange:

<https://bse.hu/Issuers/corporate-governance-recommendations/Corporate-Governance-Recommendations>

In line with the current regulations, the Board of Directors of Magyar Telekom approved the Corporate Governance and Management Report of the Company (report) prepared in accordance with the Corporate Governance Recommendations and submitted it to the General Meeting. The report – along with other corporate governance related documents - is published in the Corporate Governance section of the website of the Company:

http://www.telekom.hu/about_us/investor_relations/corporate_governance/corporate_governance_documents

Companies listed on the stock exchange are required to express their views on their corporate governance practices in two ways. In the first part of the report they have to give account of the corporate governance practices applied by their company in the given business year, including their corporate governance policy, and a description of any unusual circumstances. In the second part of the report, the issuers should give an account on their compliance with each point of the Recommendations in accordance with the "comply or explain" principle, including any reasons for derogating from a

specific recommendation and/or proposal. When an issuer does not apply a recommendation or applies it in a different way, they should explain where the differences are and offer a reason for such derogation ('comply or explain' principle). This method allows issuers to consider their unique, industry-specific etc. idiosyncrasies and to inform shareholders and market players about their derogations from general corporate governance principles and to provide an explanation. Operating on the same principle, issuers can also explain any derogations from the proposals.

Sections 1 to 5 of the above report include the description and operation of the Board of Directors, the Supervisory Board, the relevant committees and executive management. Section 6 of the report includes a description of the internal controls and risk management procedures, while Section 8 of the report describes the disclosure policies and insider trading guidelines. In Sections 9 to 10 the method of exercising shareholders' right and the rules on conducting the General Meeting is summarized, while Section 11 contains the Remuneration Policy. The Company complies with the vast majority of the 72 recommendations and proposals, however in the business year of 2021 in case of 1 proposal it has not or not completely complied with due to the organizational structure or processes of the Company.

In 2021, the Magyar Telekom's disclosure processes were evaluated in the ICS (Internal Control System) by the relevant organizational units and were tested by the internal audit area. The disclosure controls and procedures of Magyar Telekom were effective and designed to ensure a proper basis for the timely and accurate disclosures to the market participants required under the respective accounting, capital markets and company law regulations.

3 SOCIAL COMMITMENTS, LABOR STANDARDS, HUMAN RIGHTS

Some of the key challenges of the sustainability strategy come from the area of human resources management. That is why human resources management has a crucial part in the achievement of our sustainability targets. Our vision is to operate in a corporate environment that is livable, likeable and successful. This set of values strengthens the commitment and satisfaction of our employees and is also attractive on the job market.

3.1 People focus

The business strategy of Magyar Telekom is centered around the realization of a digital business model that is based on utilizing new technologies in service of consumer relationship management in order to build trust and drive value creation. To achieve this goal, the human resources organization has been transformed to an even more efficient, agile, customer-focused People Unit in support of the corporate business strategy. In 2021 we added the following targets to our existing strategic priorities: rapid and safe management of the challenges posed by the pandemic, protection of the health of our employees and customers, and adjusting to the changes in the way we work and our working environment. Magyar Telekom adapted its measures to the pandemic situation i.e. ordering general home office for every position that allows working remotely, offered PCR testing, reduction of working hours on vaccination days, providing safety masks and regular disinfection on all company sites and stores.

Key objectives and key results of people services in 2021:

Enhance digital employee experience

We continued to further develop and simplify our employee mobile application (MagentApp) introducing a new backend platform and making login authentication easier. As a result, the number of regular users increased. delivering further IT system and process developments on a quarterly basis resulted in additional improvement of employee and manager related UX/process/device experience. Along this process a new ATC (Applicant Tracking System) got introduced and our employee self-service platform Reflex got upgraded and renewed. Next to these developments we have introduced further IT tools that supports people managers in total workforce management planning and modelling.

Healthy and Happy

The company group considers the health and wellbeing of its employees paramount to sustainable and successful operations. There has been an increased effort in monitoring and safeguarding the health of employees throughout the pandemic. We have introduced all necessary measures to minimize the risk of infection and further our related initiatives, actions and available services relying on employee feedback we receive through the quarterly wellbeing pulse survey.

The pandemic has changed the way we work in the office and from home. As a result, the company has continued to draw on conclusions and prepare for a resilient way of work by rolling out a methodology for a hybrid way of work in all roles that allow such flexibility. In these cases, employees can independently design and decide on the proportion and frequency of their office and home-based work.



Energized workforce is key to business success. We rely on ourselves and each other to maintain our physical, mental and emotional wellbeing and we cooperate as partners. Thus, the company invests in communicating regularly and openly about the importance of maintaining a healthy life balance, and a sustainable and healthy way of life. Employees could attend free health screenings of their choice and company offered regular health and wellbeing expert webinars. We also continue to offer employee health and life insurance and have introduced an Employee Assistance Program (EAP) offering 3 hours of free counseling per individual life crisis or pressing issue from legal and financial, to family management or health related issues.

Learning is cool, growing is value

In accordance with employee feedback Telekom witnessed and expansion in the growing and development portfolio offered to employees in 2021. As an employer Telekom grants dedicated L&D time for employees who are being supported by a rich variety of development courses through a single digital gateway platform. Nearly all development courses are being conducted online, considering efficient outreach and engagement opportunities in times of pandemic. The development opportunities are being designed to meet the criteria detected and suggested along the employee competence development evaluation feedback sessions. We continue to offer a renewed portfolio of online learning materials, our coachbank and mentoring, online best practice sharing sessions all of which are also available for parental leavers throughout their leaves.

+1 Tackling issues caused by COVID-19 pandemic

Continuing with its purpose in 2021 the Magenta Alliance Foundation supports employees facing financial insecurities due to the pandemic crisis. The Foundation is open for applications and accepts donations from all Magyar Telekom and T-Systems employees. By the end of 2021, more than HUF 18 million in donations had been granted to more than 200 employees and their families.

In addition to the above, the following people management perspectives continued to be emphasized in 2021:

Employer brand building – we create a livable and likeable workplace, which is satisfactory for our employees and offers an attractive perspective in the labor market through its future oriented methods of work. We put greater emphasis on using social media solutions in building the brand.

Recruitment-selection – We use segment-based online recruitment channels and means to select the best candidate for the specific positions. During the selection process, we seek the inclusive attitude and personal traits defined as requirements for future Telekom employees.

Remuneration – We have a transparent, simpler and consistent job grading model, which reflects primarily the respective values of jobs, and provides for market comparison, as a basis for a competitive remuneration policy.

3.1.1 Headcount

The following table provides information on the number of employees, including full-time equivalents, of Magyar Telekom Plc.:

	2020	2021
Magyar Telekom Plc.	5,149	4,947

3.2 Policies

3.2.1 Policies and agreements

Code of Conduct

[Microsoft Word - 426-M1_eng_7_0.doc_új \(telekom.hu\)](#)

The Code of Conduct provides the framework of orientation for all employees of Deutsche Telekom Group and Magyar Telekom Group. Additionally, it applies to people to who are viewed as equivalent to employees in functional terms, e. g. to temporary agency employees. It combines the joint requirement of compliance with legal obligations and acting with integrity and thus ensures that Deutsche Telekom and Magyar Telekom remain transparent and traceable enterprises for everybody. Deutsche Telekom and Magyar Telekom expect their suppliers and consultants to comply with the rules of

behavior manifested in this Code of Conduct and to endeavor them to ensure that they are also obliged to abide to its regulation by contract.

Code of Human Rights and Social Principles

<https://www.telekom.hu/static-tr/sw/file/code-of-human-rights-social-principles-eng.pdf>

The Code of Human Rights and Social Principles as well as the company groups Equal Opportunities Plan in force defines the groups general human rights principles and the provisions for the implementation of these principles. Decision makers of Magyar Telekom Group are aware that employee diversity is the prerequisite of sustainable and equitable operations enhancing business efficiency and contributing to competitive advantage.

Group Diversity, Equity and Inclusion Policy

[CSOPORT POLITIKA A SOKSZÍNŰSÉGRŐL, AZ ESÉLYEGYENLŐSÉGRŐL ÉS A BEFOGADÁSRÓL \(telekom.hu\)](#)

As part of the Deutsche Telekom Group, Magyar Telekom Group has renewed its Diversity, Equity and Inclusion (DE&I) Policy in December 2021. The renewed policy defines our global understanding of what characterizes the approach to diversity, equity and inclusion in our interactions with employees. It aims to ensure a consistent work experience, learning and development for every member of the company group, strengthening the sense of belonging and involvement. The framework of the renewed policy details and clarifies our understanding of DE&I through a set of key elements and covers aspects of the work-life cycle that are relevant to the company culture. It addresses social and business responsibility in providing an equitable and inclusive workplace locally within its global framework but respecting local legislation of diverse cultures and local needs.

Group Policy on Employee Relations

[Telekom_Group_policy_on_employee_relations.pdf](#)

The opening up of markets, digitalization and globalization have led to an increasingly knowledge-based working world. New forms of networking are changing communication, public impact, reputation and compliance challenges and other key elements of company management. Thus, we realized a need to renew our definition of how we understand the shared characteristics of our employee relations to ensure consistent working experience for every employee. As part of the Deutsche Telekom Group, Magyar Telekom Group has renewed its Group Policy on Employee Relations in December 2021. It specifies the key elements of our people policy and describes what we stand for in our relationships with employees, that are characterized by our shared values and derive from a set of values as well as from other group policies. The policy covers all aspects of work life that are relevant to industrial relations and informed by sustainability as a key driver.

Suppliers' Compliance: Magyar Telekom Group is committed to respect and protect human rights and it expects its suppliers to comply with these rules of behavior. Prior to becoming authorized suppliers of Magyar Telekom and T-Systems our suppliers must register their enterprises at our vendors' registration site.

https://beszerzes.telekom.hu/beszerzes/porta_en?appid=beszerzes&page=english/registration_vendor.vm

As an obligatory part of the registration process vendors are obliged to understand and accept our Suppliers Code of Conduct that among other policies, entails our Code of Conduct, Social Charter and Diversity Policy. Our suppliers must understand and accept these policies and obligatory frameworks for their behaviors as well.

Equal Opportunities Plan

[Telekom_Equal_opportunities_plan.pdf](#)

Anti-discrimination and the safeguarding of equal opportunities is a key priority to Magyar Telekom Group. According to the act CXXV of 2003 on Equal Treatment and Promotion of Equal Opportunities, and the corporate protocol in place since 2010 Magyar Telekom Group has accepted its 5th Equal Opportunities Plan in order to secure the practices of equal treatment, the advancement of equal opportunities and the monitoring an improvement of the labor positions of particular disadvantaged employee groups. The Equal Opportunities plan currently in force is valid between 2021 and 2025 and has been developed in close cooperation with the employee representative bodies.

The Diversity Charter of the European Union – Hungary has joined the Diversity Charter of the European Union in 2016 and, among 50 signatory companies Magyar Telekom has also underscored its dedication to safeguard diversity as a

fundamental value. Magyar Telekom has been among the signatory companies in the forthcoming years as well as in 2021.

UN Guiding Principles on Business and Human Rights – According to the dedication of Magyar Telekom Group to safeguard and protect human rights along its operations as stated in the UN Guiding Principles of Business and Human Rights, the company considers the rights and guidelines stated in the Universal Declaration of Human Rights and in the ILO's Declaration on Fundamental Principles and Rights at Work to be mandatory in its own practices.

UN Human Rights Treaties ratified by Hungary – Magyar Telekom Group as a corporation legally registered in Hungary is carrying out its entire operations and business practices in full accordance with the nationally ratified UN Human Rights Treaties.

http://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=77&Lang=EN

3.2.2 Monitoring and auditing practices

The group-level coordination of corporate sustainability operations that also incorporate labor standards, social issues and the protection of human rights is being coordinated under the auspices of the Sustainability Committee (SC) from 2021 (previously: Group Sustainability Coordination Council) on the levels of strategy development, governance and operative execution.

The SC's operation is regulated by a group level directive: on the regulation of Magyar Telekom Group's sustainability operation and the responsibilities and competence of stakeholders. According to the directive, the SC meets regularly, at least quarterly, to coordinate company and group sustainability tasks effectively, with decisions taken by SC members through voting. The SC provides regular reports and presentations to the Chief Executive Officer (CEO) and the Chief People Officer, on the basis of which they set the main direction of the Magyar Telekom Group's sustainability activities and make decisions in related topics, with the input of the members of the Leadership Squad. The operations of the SC are being detailed in the Corporate Governance section of the annual Sustainability Report.

Magyar Telekom Group's Code of Conduct covers the requirements of corporate compliance and states our collective set of values, and thus stands as an affirmation of Magyar Telekom's strong reputation, solid position and future success. The Code of Conduct applies to all board members of Magyar Telekom Group from employees to managing directors, executives and board members. Furthermore, Magyar Telekom Group expects its suppliers and consultants to comply with the rules of behavior manifested in this Code of Conduct and to endeavor them to ensure that they are also obliged to abide to its regulation by contract.

Magyar Telekom Group's Corporate Compliance Program has been elaborated with the aim to ensure that Magyar Telekom Group conducts its business with maximum consciousness and commitment, in accordance with relevant laws and regulations, in harmony with the strictest possible business ethics standards. The Compliance Program involves the Group Compliance Manager and compliance representatives of particular functional areas of operation, who are working together as members of the Group Compliance Committee. The Compliance Program has been designed to ensure that the Group conducts its business to the highest standards of awareness, transparency, accountability, commitment, and adherence to applicable laws and regulations.

External audits could be conducted as part of the control process carried out by the Hungarian Labor Inspectorate. The Inspectorate has the right to issue such an auditing process in case of public complaints or issued requests. The Inspectorate also provides counseling to the corporations in support of legal compliance.

3.3 Results of Policies

3.3.1 Diversity and Equal Opportunities

As one of the largest employers in the Hungarian ICT sector we believe that diversity contributes to the success of businesses and all kinds of organizations to a large extent. This value is also at the core when it comes to the increase of creativity and innovation, to the involvement of new partners, experts and clients, to the quick adaptation to changes and most of all, to the compliance with the legal obligations of non-discrimination in all corporate operations.

Magyar Telekom and the employee representative bodies have accepted the 5th Equal Opportunities Plan of Magyar Telekom Group for the period 2021-2025. The corporate Equal Opportunities Plan addresses actions and procedures to improve the labor conditions and career perspectives of vulnerable employee groups such as women, employees with families, employees on child-care leave, employees living with disabilities, recent graduates and 50+ employees. The

corporate diversity and inclusion expert and the employee representatives discuss the conducts and results of the action plan annually. Several employee surveys contribute to the development and the adjustment of the actions each year, allowing the rollout of the equal opportunities plan to adapt to employee needs.

The principles of justice and equal treatment of Magyar Telekom are being defined by our Code of Conduct. Ways of non-typical employment such as Telework, flexible working hours, part-time work, employment of people living with disabilities allow the company to realize the principle of equal treatment in practice. These measures are further assisted by several measures implemented in corporate day-to-day operations, such as the large office spaces that are designed to support Teleworking in the new headquarters of Magyar Telekom. The success of the process of dealing with the pandemic in 2020 was largely determined by Telekom's long-standing telework culture and the stable availability of work tools for digital work. In 2020 and 2021, due to the pandemic situation, 100% teleworking of the entire call center area also took place.

In accordance with Hungarian labor legislations we provide our employees with extra days off after their children, and after blood donation. In case of more than 40% health damage we provide our employees with extra five days off annually for rehabilitation. On top of these we also credit the voluntary work of our employees by providing days off, the proportion of which is strictly regulated in internal directives.

One of the key objectives of the new group level corporate sustainability strategy 2021-2030 among climate protection and digital inclusion is the improvement of diversity and inclusion experience on both customer and employee side. It was launched in 2021 and is in effect until the end of 2030. The details of the Sustainability strategy 2021-2030 are going to be presented in detail in the Sustainability report being published in first half of 2022.

In 2021 the company continued with practices securing equal opportunities for all employee groups. Following the process developed in 2020 we continued to monitor our gender pay gap along 9 indicators identifying multilayered action plan to tackle the detected inequalities and further reduce the overall gap between male and female general workforce. In 2021 we have joined the „One step closer” initiative of Amnesty International with our commitment to reduce our gender wage gap by at least one percent annually.

In the first half of 2021 we have launched our B@ck to Work Café online workshop sessions to our colleagues on parental leave, we managed to reopen our on-campus childcare facility in the summer and fall school holiday season thus supporting parents in the difficult family management periods. Before the Christmas holidays all of our parent colleagues raising children between the ages of 3-10 were gifted with our very own children's book (My Mummy/Daddy Works at Telekom). The storybook offers a playful introduction to the magical world of telecommunication for the preschool and elementary school aged children and offers examples on how to develop family rules for conscious screen time and internet use.

3.3.2 Anti-discrimination and labor-market integration actions

As an employer, Magyar Telekom has issued the following actions in 2021 to improve the conditions of the employee groups marked in the 2021–2025 Equal Opportunities plan.

As a mentor company Telekom supports roma workforce integration programs Integrom and HRom to contribute to the equal labor market opportunities. The program participants are being supported with job application counselling, job interview-practices, CV writing and editing skill practices. Our inclusive recruitment practices include dedicated recruiter tracking support for program participants throughout their application process, providing detailed evaluation and feedback, and company mentoring upon request. Starting from the fall of 2021 Telekom joined the HBLF Romaster initiative supporting two talented roma students for 4 years with scholarship funding and mentoring.

For the first time in the history of the company group the LGBTQ & allies employee group of Magyar Telekom, T-Systems Hungary and Deutsche Telekom IT Solutions Hungary have attended the Budapest Pride March. We have continued to work on and improve our LGBTQ inclusive workplace initiatives as well.

The Gold Class of the Disability-Friendly Workplace award was granted in 2020 but we were only able to receive it on a formal awarding ceremony in 2021. The award is being granted by the Salva Vita Foundation, the American Chamber of Commerce, the Association of Excellence Public Benefit Association, and the Hungarian Ministry of Human Capacities. Following up on manager-nominations four Telekom employees with disabilities were awarded with DFW Role-Model awards and our diversity and inclusion expert was awarded with a DFW Disability Ally award. In order to secure the equal opportunities of our current and future colleagues living with disabilities, we are using a special module on our online job-application site (<http://www.telekom.hu/rolunk/karrier>) since 2010, where our applicants are encouraged to state any

accessibility requests they might have in order to attend the selection process. Apart from workplace accessibility we support the workplace integration and enablement of our entrants and their welcoming teams by education materials with modules for basic attitudes and inclusive behavior with colleagues with visual or hearing impairments, colleagues facing physical or mental difficulties to work independently within the team. We also provide workshops on demand.

3.3.3 Respect of Human Rights, actions against child labor and all kinds of forced labor

As disclosed in the Code of Human Rights and Social Principles the company rejects child labor and all kinds of forced or compulsory labor and fights against all kinds of human trafficking and modern-day slavery by all means at its disposal. As the parent company of Magyar Telekom Deutsche Telekom Group is responsible for supply chain compliance auditing and management on a global level. More detailed information about the methodology and results of the global supply chain management at <https://www.telekom.com/en/corporate-responsibility/assume-responsibility/assume-responsibility/supply-chain-management-355304>

New employees of Magyar Telekom Group as part of their orientation process in their first two months receive compulsory education about the company principles, guidelines and practices concerning social issues, labor standards and human rights. All employees must understand and accept these guidelines as the fundamentals of their own professional behavior and operations and they are also obliged to complete the Telekom unconscious bias e-Learning course during the onboarding period.

In line with the Code of Human Rights and Social Principles, all Magyar Telekom Group employees and all partners closely related to our brand representation attended trainings regarding human rights. From the end of 2018 the training is part of the compulsory trainings of Magyar Telekom.

Moreover, the company is aware of the fact that there could be situations in which it is harder to tell appropriate from inappropriate. In order to assist employees in making the right choices in these situations, the company offers secure internal whistleblower channels, operated by the Corporate Compliance Department. "Kérdezz!" ("Ask me!") advice portal has been set up to help resolve uncertainties as far as compliance-relevant behavior is concerned. Serious misconduct must be announced for prevention purposes and for appropriate sanctions. For this reason, the "Tell me!" whistleblower portal has been established. The main principles and the detailed description of the internal inspection process is detailed in employee directives available on all employees on the shared intranet platform. Throughout the inspection process the whistleblowers' anonymity, personal and data privacy are guaranteed and handled with utmost discretion.

3.3.4 Relationship of management and employees

At present two unions (Telecommunications Trade Union (TÁVSZAK) and T-Net Trade Union) and workers' council operate at Magyar Telekom, communication with them runs on two levels. Central decisions concerning the whole Company, when the employee representation bodies need to be consulted, are deliberated with the Central Workers Council and the representatives delegated by the trade unions, either in the frame of joint consultation (Interest Reconciliation Council), or separately, depending on the nature of the matter discussed. Central communication is managed both verbally (negotiation) and in writing. The Chief People Officer and the accredited HR business partner are responsible for central level communication with the employee representation bodies. Interest enforcement issues concerning a given governance area are also discussed locally with the representatives of the trade unions and the local workers' council. The HR Business Partners of the governance area are responsible for communication with the local employee representation bodies.

Trade union and the workers' council (Central Workers Council) must be consulted and their opinion solicited on significant decisions resulting in organizational changes or changes affecting a large group of employees. In organization restructuring decisions the collective bargaining bodies have 7 days to submit their comments, in other cases 15 days. The measure in question may not be implemented during this 15-day period. Trade unions and workers' councils (Central Workers Council) must be consulted with regard to draft resolutions, aiming at organizational changes without regard to the number of employees concerned.

Under the Act V of 2013 on the Civil Code one third of the Supervisory Board shall consist of employee representatives. The employee representatives in the Supervisory Board are nominated by the Central Workers' Council considering the opinion of the trade unions operating at the Company. Persons nominated by the Central Workers' Council shall be elected by the General Meeting to the member of the Supervisory Board, except if disqualifications exist in respect of the nominated persons. On December 31, 2021, there were two members of the Supervisory Board were employee representatives. These members were Tamás Lichnovszky and Zsoltné Varga.

3.3.5 Freedom of organization and collective bargaining

Magyar Telekom Group acknowledges the basic rights to freedom of organization and collective agreement in its Social Charter. In line with an openness and trust that relies on a constructive social dialogue, Magyar Telekom Group declares its support to cooperation with the legitimate representatives of the employees in order to establish a balance of interests.

The Social Charter together with the long history of mutual respect and cooperation of the management and employee representative councils are the guarantees that these rights are being fully and thoroughly respected. 100% of the employment contracts of Magyar Telekom Group employees operating in Hungary fall under collective bargaining agreements developed with the Hungarian Telecommunications Trade Unions (Távközlési Szakszervezet, TÁVSZAK and Magyar Távközlési Ágazati Szakszervezet, MATÁSZ). The agreement, which can be terminated by either party with three months' notice, applies to all Magyar Telekom Plc. employees except the CEO, regardless of their union membership status. Wage terms in the collective bargaining agreement must be renegotiated annually. If the employment is terminated due to reasons related to the employer's operation, employees are entitled to a specific amount of severance pay surplus, which depends on the tenure of the employee.

In addition to the collective bargaining agreement, employees of our Hungarian operations are generally covered by the Act I of 2012 on the Labor Code, which imposes various restrictions on the involuntary termination of employment. The Labor Code protects employee interests through two different labor organizations: the Trade Union and the Workers' Council.

The Trade Union, as the official representative of employee interests in negotiations relating to the terms of employment, has the right to be informed of all corporate measures that may significantly affect the interests of employees and to commence legal action against the Company for employment-related conduct that infringes an employment rule. In addition, the Workers' Council directly represents employee interests in dealings with management and decides jointly with management on matters involving employee welfare funds and institutions. The Workers' Council must be informed semi-annually on issues affecting our economic performance and changes in wages, employment conditions and working hours. The Workers' Council must also be consulted on corporate measures affecting employees.

We believe that our relations with our employees are good. We have not experienced any labor strikes or disruptions since our formation.

3.3.6 Workforce Reduction and Redeployment

Magyar Telekom – in order to ensure the resources related to the Company's strategic objectives - has reached an agreement with the trade unions in 2021 on headcount reduction and wage increase measures for 2022.

According to the terms of the agreement, there was no company-initiated downsizing, nevertheless the company did offer an opportunity for the employees to leave in a voluntary program. Majority of employees that entered the program left the company by November 1, 2021. The company provides active job search, labor market training and one-on-one counselling to the colleagues laid off, in the framework of Program Chance, which has proven its success in the past years, and trusts that the above support these highly-trained employees of up-to-date professional expertise in finding employment elsewhere as soon as possible.

It is planned to reinvest a significant proportion of the expected employee cost savings in resources related to the Company's strategic objectives.

3.3.7 Benefit Programs

Magyar Telekom's welfare and social benefits constitute an exceedingly wide-ranging pool. A part of them is granted to every employee, while others are available on certain conditions or are of an insurance nature. In case of certain benefits, employee's individual contribution is a prerequisite of the employer's contribution. The way social benefits and discretionary benefits are granted is set out in the Collective Agreement and related regulations.

We provide employees with telecommunication allowances, fringe benefits life and health insurance benefits and health screening packages.

3.4 Risk management

3.4.1 Providing educational and professional background

The educational pillar of Magyar Telekom's Sustainability Strategy aims to improve the digital competencies of the clients and the wider public. It also aims to contribute to the development of industrial succession knowing that a potential throwback in the amount of available highly qualified professionals in the industry could mean a serious risk to maintaining, improvement and development of the quality of our services. In order to secure the highest quality service to our clients we need work with the best professionals. To be able to have them a competitive industrial educational background is necessary.

Upon the initiative and by funding of T-Labs (Telekom Innovation Laboratories, Berlin) the faculty Data Science and Engineering began to operate at Eötvös Loránd University from September 2016 as the first pillar of the EU Labs researcher network. The role of Magyar Telekom is in the support of the teaching and research capacities.

Our colleagues are in close relationship with several higher education institutes and we help the universities with consultancy for writing theses, expert education and giving lectures.

We have signed a strategic partnership with the Budapest Technology EC Puskás Tivadar Technical School for Telecommunications and IT, the Miskolc EC Kandó Kálmán Technical School for IT Technology and the Székesfehérvár EC Technical School. The aim of the partnership is to offer professional support in keeping the curriculum up-to-date with the latest technological realities of the industry and help our partner institutions in promoting telecommunication related careers. In addition to these we also offer student work opportunities for students of these education centers. We have given several career orientation lectures in the fall of 2021, along which the students could gain an in-depth insight in the everyday challenges and opportunities of present day telecommunications. We have also signed a partnership with Szent István University, in order to offer the training practice pillar of the electric engineer dual major. 2021 December also witnessed the formation of the "Deutsche Telekom Group remote IT Faculty" at Óbuda University which is the joint education platform of Deutsche Telekom IT Solutions, T-Systems Hungary and Magyar Telekom.

90% of the first Kickstart-class, 18 trainees have continued to work in junior positions at Magyar Telekom following their trainee year. In 2021 22 senior year university students joined Magyar Telekom as the second generation of Kickstart trainees. During the one-year program, the trainees received professional, soft-skill and design thinking trainings. Kickstart trainees who work in a variety of areas throughout the company gather up for a half term agile project assignment strengthening their ability to work in a cross-functional team. The joint project task is based on real business needs, thus strengthening the importance of the program in parallel with the development of MT.

Launched in March 2020, MagentaKraft helps young visionaries with trainings and events on their journey to develop their inventions and projects. The KraftRoad program supports young talents with workshops and events in the development, elaboration and improvement of their innovation projects. In 2021 Telekom Kraft was home to 9 innovation projects. Apart from individual projects the participants can also join Telekom in contributing to selected projects and thus gaining professional training. As an example of such collaboration, one of the Krafters designed the wall-art in one of our stores and later became one of the graphic designers of Telekom. Other examples include representation of talented young video artists and directors in the Kraft video series. We have opened the KraftLab in Debrecen in September 2021, where all the technology and the lab space is given for the Krafters from video-studios, to podcast studios and robotic limbs.

3.4.2 Employee expectations and equal opportunities

The pillars of our People Focus are based on the aim to meet the needs of our employees, and to live up to the challenges of maintaining our company status as a highly competitive and future oriented employer. Our employees require security, stability, opportunities for advancement and competitive compensations. Magyar Telekom, as a company committed to provide equal opportunities to its employees, finds it especially important to harmonize wages and to terminate unjust wage gaps. Our tiered wage system, built on Hay methodology, serves the above purpose. Our remuneration system is fully transparent thus our base wage tables and the relevant policies are available for all employees. In addition, we have renewed our internal position system in 2021 to become a more transparent and simple organization. The dimensions of the position system are being developed at the intersections of the Hay-system and the competence-based position levels of our agile organizations. We pay extraordinary attention not to differ unreasonably the wages of the employees performing the same tasks and that the wage differences between the employees reflect real work differences. As a responsible company, we are aware of the social phenomenon of the gender pay gap and are committed to eliminating its root causes within our own business environment. Since July 2020, we conduct regular and complex gender pay gap

analysis, during which we define our equal opportunities action plan to reduce the possibilities of inequalities such as the 'motherhood penalty' and the female career gap.

As an employer dedicated to diversity as a core value, Magyar Telekom finds it important to raise the amount of women in leadership positions. One of the key objectives of the Diversity pillar of our Sustainability strategy is to reach at least 35% of female leadership by 2025. From May 2020, for the first time in the company's history, we have achieved a balanced 50% gender ratio in our senior management which we continued to maintain in 2021. The proportion of female leadership in the overall management was 25.85%.

Magyar Telekom considers stress, overload and burnout related risk-reduction as its priority duty in relation to its employees. In order to take charge of these risks by securing an empowering environment to develop and maintain a healthy lifestyle, employees are also provided with coaching and training opportunities and the availability of the Employee Assistance Program all of which help in maintaining a sustainable life balance. Efficient work-life balance of employees with families is further supported by our child-friendly offices and the available, tax-free nursery and/or kindergarten support that could be selected from our cafeteria benefit scheme, thus contributing to the reduction of expenses. Taking notice of the special conditions of employees (ex. illness or the longer-term domestic care of a relative) a longer period of unpaid leave is also available. In the changed situation caused by the pandemic, we also supported the physical and mental health of our employees by providing online gym exercise sessions and coaching opportunities.

3.5 Performance indicators

Non-typical employment at Magyar Telekom Group

- No. of Part-time employees in 2021: 123
- No. of Flexi-time employees in 2021: 1,202
- No. of Teleworking employees in 2021: 3,909

More women in leadership positions at Magyar Telekom Plc.

- Percentage of women in overall workforce: 35.5%
- Percentage of women in senior management: 25.85%
- Percentage of women in Leadership Squad: 50%

Volunteer work benefits at Magyar Telekom Group

- No. of volunteer working hours (blood donation): 3,290
- No. of volunteer employees (blood donation): 183

4 COMPENSATION OF MEMBERS OF THE BOARD OF DIRECTORS, SUPERVISORY BOARD, AND MANAGEMENT

The aggregate compensation of the members of the Board of Directors in their capacity as Board members was HUF 22 million in 2021.

The aggregate compensation of the members of the Supervisory Board in their capacity as Supervisory Board members was HUF 37 million in 2021.

The total compensation expenses (including social security and other payroll-related taxes as well as contractual termination expenses) of the members of the Leadership Squad (LS) was HUF 1,329 million in 2021.

On December 31, 2021, four members of the LS have an employment contract with indefinite and two members with definite duration. The notice period is two months for three of the indefinite contracts, and three months for one. The severance payment usually is in accordance with the Labor Code and the Collective Agreement, for the contracts the severance payment is usually between 3 and 16 months.

In addition to the above, the affected persons are bound by the non-compete clause, under which the employee is barred from entering into employment with any Hungarian or international competitor of Magyar Telekom and is required to refrain from providing direct or indirect services or activities of any kind to such companies for a definite period (not longer than one year) upon termination of his/her employment. Furthermore, such employee is barred from any action aimed to recruit employees of Magyar Telekom for any other company. This limitation entails certain compensation which is proportional with the above obligation. If the employee is in breach of the agreement, he/she will reimburse the net amount of compensation to the employer. In addition, the employee will be liable for a payment of compensation to the employer.

LS members from foreign countries may be entitled to housing subsidies. There are two members affected by this entitlement.

In line with the Company's remuneration guidelines, the Company provides contribution-based personal pension scheme, personal insurance scheme and health insurance scheme for the LS members. In addition, the LS members are entitled to the use of company cars.

For information about the Share Based Compensation programs, see Note 20.1.2 of the Financial Statements.

5 RESEARCH AND DEVELOPMENT

In addition to innovative Hungarian SMEs, the research and development tasks are performed by the internal researchers as well as the product and services development staff of Magyar Telekom Group. In addition, the Company also takes advantage of the synergistic effect of the internal and external knowledge base and seeks partnerships with well-known innovation centers and higher education institutions. Our main partners are well-known Hungarian universities and research institutes. In December 2021, "Deutsche Telekom Group IT" Off-site Department was formed at Óbuda University, which was founded by Deutsche Telekom IT Solutions, T-Systems Hungary and Magyar Telekom. The first courses will be held in the field of DevOps within the scope of the new educational program in the spring semester at Óbuda University, which is expected to be expanded with further subjects in the future.

Exploiting the potential of new technologies, including research and development of the fifth-generation mobile technology, is crucial for Magyar Telekom Group. Therefore, beyond those presented in the previous year, in 2021 MagentaKraft continued its activities. MagentaKraft is Telekom's innovative youth platform, which aims at providing new value for the young generations. MagentaKraft provides an opportunity for those who already have a big or little idea in their mind, but don't have the necessary tools (infrastructure, environment, team). Further details in Note 3.4.1.

6 REAL ESTATE, SITES OF OPERATION

We have one of the largest real estate holdings in Hungary. We use substantially all of these properties for telecommunications installations, offices, warehouses, garages and shops. Our equipment and machinery primarily consist of switches, communication towers and other telecommunications equipment. In order to increase the utilization of real estates and increase efficiency, we make efforts to sell our surplus properties.

6.1 The registered office of the Company:

- 1097 Budapest, Könyves Kálmán körút 36.

6.2 Sites of the Company:

- 1073 Budapest, Dob u. 76-78.
- 1106 Budapest, Őrs vezér tere 25. 1. em.
- 1138 Budapest, Váci út 178.
- 1195 Budapest, Üllői út 201.
- 1191 Budapest, Vak Bottyán u. 75. a-c.
- 1024 Budapest, Lövház u. 2-6. 2. em.
- 1123 Budapest, Alkotás út 53.
- 1062 Budapest, Váci út 1-3.
- 1117 Budapest, Október huszonharmadika utca 8-10.
- 1033 Budapest, Huszti út 32.
- 1098 Budapest, Táviró utca 3-5.
- 1156 Budapest, Száraznád utca 1-3.
- 1211 Budapest, Rákóczi Ferenc út 154-170.
- 1087 Budapest, Kerepesi út 9.
- 1119 Budapest, Hadak útja 1.

Out of the 1,624 buildings on the 1,459 sites of Magyar Telekom Plc, 44% are owned by the company, 5% are jointly owned and the rest 51% are leased. These figures do not contain the technology sites, of these types of sites we have 6,295.

The total area of properties used by Magyar Telekom Plc. as of December 31, 2021 was 599,707 m². The majority of sites used in our operations are smaller than 100 m². The largest site is our headquarters building (leased) located at Könyves Kálmán krt. 36 in Budapest, with floor space of over 55,000 m².

7 SUSTAINABILITY

Magyar Telekom has been addressing the sustainability implications of its operations for close to twenty years, and for more than 15 years its sustainability activities are characterized by comprehensive, long-term plans, and the Company started its fifth five-year sustainability strategy (2021-2025-2030) in 2021.

Magyar Telekom has committed to support the ten principles set forth by the UN Global Compact since 2009 in the areas of human rights, environment and anti-corruption, the results of which are also addressed by its Sustainability Reports.

In 2015, the UN adopted its sustainable development blueprint to be implemented by 2030. These 17 goals and 169 targets determine the main direction towards resolving the most urgent problems posing a threat to humanity and the planet. Magyar Telekom elaborated its Sustainability Strategy encompassing the period from 2016 through 2020 and from 2021 through 2030 as well along these SDGs. The company's contribution to the priority goals originated from its business is presented in a separate assessment linked to the Sustainability Report yearly.

Magyar Telekom's sustainability activities and achievements are comprehensively discussed in the annual Sustainability Reports, which aim to make the Group's environmental, social and economic activities transparent to everyone.

The present report includes reference only to certain key topics of our sustainability approach, namely human rights, employees, environment protection and compliance.

7.1 Sustainability strategy

In 2021, Magyar Telekom Group started its current ten-year sustainability strategic cycle, 2021-2030.

In addition to the results of our Sustainability Strategy 2016-2020, the goals and tasks defined for the period through the end of 2030 have been determined by the goals and directions applied internationally in terms of sustainable development (SDG, CDP, TCFD). When identifying the priorities, the company has focused on the expectations of the responsible investors monitoring our company and the current corporate trends. Of course, local market conditions, as well as consumer behavior and demand have also been taken into account, with a proactive and awareness raising attitude.

When identifying strategic goals, it was kept in mind that the Group's sustainable operation has a significant impact on the society, the economy and the environment. In addition to playing an important role for the livable future of several million customers and several thousand employees, as a market leading ICT provider and a large enterprise of regional proportions, Magyar Telekom is aware that our business and operational decisions influence the economy and the society of the future, too. It is its firm belief that Telekom, as a company, is responsible for all the groups of people whom it can enable by ICT solutions, and that it is inevitable to engrain social, economic and environmental responsibility as part of its corporate DNA thus promote sustainable development and opportunities for future generations. Along this, the new strategy defines its priorities in two main approaches: internal operational objectives and a catalytic role in the market by empowering others.

The main objective set forth by the fifth Sustainability strategy defined in 2021 is to ensure that Magyar Telekom Group maintains its position as a leading sustainable company through digitization: a catalyst of growth for people, families, communities and businesses, and an accelerator of environment. Such goal can only be achieved if considering all three pillars of sustainability such as social, economic and environmental dimensions, the company approached these factors in a comprehensive, credible and innovative manner. Until the end of 2030, climate protection, digitization and diversity are in the focal point of the strategy.

Climate protection

Magyar Telekom Group keep the direct and indirect emissions (scope 1+2) at net zero by an 84% decrease and reduce the part of the emissions of suppliers and customers attributable to the company (scope 3) by 30%. Our customers take climate action and reduce emissions by providing ICT services applicable as climate protection (i.e. smart) solutions. At least half of our revenues come from services that support climate protection by 2030.

Digitization

100% of customers of Magyar Telekom throughout the country will be provided with gigabit access and 6 million people will achieve responsible digital maturity.

Diversity

In the previous period, diversity and equal opportunities have already been in the focal of the Magyar Telekom's Sustainability Strategy. In the new strategy (2021-2030) Magyar Telekom's goal is to create a 100% inclusive workplace and to create a 100% accessible UX for customers with disabilities.

The details of the Sustainability strategy 2021-2030 is going to be presented in detail in the Sustainability report being published in first half of 2022.

Awards and sustainability recognitions achieved in 2021 and continuously relevant recognitions:

- FTSE4Good Index membership, FTSE Russel ESG Ratings
- CECE SRI sustainability index membership
- MSCI ESG rating AA (scale: CCC-AAA)
- ISS ESG B Prime rating (scale: D – A+)
- Disability-friendly Workplace title, gold grade
- Family-friendly Workplace certificate, bronze grade – initiating organization: Családbarát Ország Nonprofit Közhasznú Kft.
- Family-friendly Mentor Company – initiating organization: Három Királyfi, Három Királyné Mozgalom
- As a Family-friendly Mentor Company, Magyar Telekom founded the "Vándordíj" Award
- Most Attractive Telco Workplace of the Year 2021 – initiating organization: PwC
- Magyar Telekom has been included in the Zynern 2021: Most Attractive Employers list
- Most Attractive Workplace in Telco sector 2021 – initiating organization: Randstad
- External Communication of Employer Brand: Grand Prix Hungary

7.2 Initiatives concerning stakeholders

In order to successfully operate the Company, it is essential to have strong relations with stakeholders.

Below you will find a list of our key activities the details of which are elaborated in the respective chapters of the [Sustainability Report](#):

- Investors – investor (and responsible investor) assessment
- Customers – sustainable products and services, child protection
- Employees – community solar project, family friendly services, diversity contents
- Regulators – conformity, regulatory relations
- Local communities – Telekom Community Gardens, Superfast Internet Program (SZIP), network development
- Non-profit organizations – Magenta 1 Business/Nonprofit
- Suppliers – sustainable supply chain management
- Media
- Future generations – Become! part of generation NOW, Forum "Most", Magenta Podcast

Stakeholders can express their expectations online towards Magyar Telekom. The company then takes them into account in course of pursuing our sustainability activities.

Activities related to more stakeholder groups

As part of our 2018 Diversity&Inclusion plan, Magyar Telekom is striving towards an inclusive, open and safe working environment for employees from all backgrounds. In order to promote a working culture of inclusion and non-discrimination, the company has developed the first Hungarian language unconscious bias e-learning material and

launched it as a mandatory course for all employees, 92% of whom have successfully completed it by the end of October, 2019. The e-learning is now part of the onboarding curriculum and is mandatory for all new entrants. The aim was not only to support the development of its own working culture but to provide accessible and easily adaptable learning material for all Hungarian enterprises and thus contribute to the promotion of anti-discrimination in the society at large. Telekom was one of the corporations that supported the background research and white paper publication of Egyenlítő Foundation offering guidance to large corporations in female executive selection.

Recognizing the importance of plastic pollution, Magyar Telekom set a new goal to significantly reducing the amount of single-used plastics generated during our operations. Within the Plastic Free Telekom initiative, first we removed these plastics from the headquarters operation in 2019. We provided our colleagues filtered water and jugs to reduce the amount of PET bottles. In 2020, the company introduced additional plastic removal steps, however, at the time of the pandemic, it was not possible to assess plastic use and remove PET bottles. In 2021, the pandemic continued to severely limit the progress of the project. As the majority of colleagues continued to work from home, it was not possible to record the volume of PET bottles in any meaningful way in the latter period. If the colleagues return to the offices – expected in spring 2022 – the Plastic Free Telekom project will be reactivated.

Investors

Magyar Telekom remained to be a constituent in the FTSE4Good Index Series in 2021. The US based MSCI rated Magyar Telekom into the category 'AA' on the scale CCC-AAA. The German ISS at its ESG assessment gave the B Prime rating to the company. Magyar Telekom continued to disclose climate related data and information via the CDP platform. Magyar Telekom remained a constituent in the CECE SRI (formerly CEERIUS) Index on the Wiener Börse as well.

Customers

Magyar Telekom would like to offer the choice to its customers who consider it as important as the company do to fight against climate change to pick a service that serves the purpose of protecting the climate. That is why Telekom came up with the ExtraNet Green 1GB option in 2019. In 2021, by choosing the ExtraNet Green 1GB data extension option, Magyar Telekom guarantees to generate the same amount of energy as the one required to transmit 1GB data using our solar power plants installed on the top of the Kékvirág street facility and on the top of two facilities in Szeged.

The children's protection website of Magyar Telekom is dedicated to threats caused by children's media consumption. The website provides information to parents not only about ICT technologies, devices and content, but also about threats caused by their usage and consumption, as well as possible preventive measures. More details are available on:

http://www.telekom.hu/about_us/society_and_environment/society/protection_of_our_children

Employees

In March 2021 Magyar Telekom announced again its community solar project. During the program employees had the opportunity to adopt a solar panel. 200 solar panels had been adopted in less than an hour.

In 2021 Telekom continued its work on the improvement of diversity and equity based on the results of the 2020 employee survey. It offered 6 B@ck to work Café online sessions in the first half of the year, providing guidance to for parental leavers who are planning their return and promoting the development, career planning and contact keeping tools that are available. Telekom and T-Systems established its first LGBTQ resource group which initiated actions and process development initiatives to further the inclusion of LGBTQ workforce. Since November, 2021 the company joined the corporate donors of HBLF Romaster initiative and committed to support support of two roma students for 4 years.

For the first time in the history of the company, gender ratio in Magyar Telekom's top management became balanced in 2020 and a number of measures were taken to further improve the proportion of female executives in the entire management team. The company continued with the monitoring of its gender pay gap, along which further developments are being initiated. Magyar Telekom Group joined the "One step closer" initiative of Amnesty International in 2021 with its commitment to close the gap with at least one percent each year.

In July, the management of Magyar Telekom set up the Magenta Alliance Foundation to help colleagues in a difficult situation due to the pandemic. By the end of December 2020, nearly HUF 6 million was donated by employees. The company's board of trustees provided support to employees in 100 cases distributing more than HUF 15,5 million. In

2021, the pandemic continued, so the Magenta Alliance Foundation continued to operate. In 2021, the Foundation provided more than HUF 18 million in support for the more than 200 employees and their families.

Local communities

Magyar Telekom and the Hungarian Contemporary Architecture Centre continued to run community gardens in 2021, too. Gardening works are still ongoing at Csárdás Garden. Although, the Kerthatár Community Garden has been closed due to the sale of real estate, a new community garden was created in Pomáz.

For Telekom it is utmost important that no one is left behind without accessing the opportunities and benefits of the digital world. Within the framework of the Digital Welfare Program, Magyar Telekom has launched its fixed and mobile Digital Welfare Program package providing quality internet service for users seeking to subscribe at most affordable rates, furthermore by introducing the Digital First Aid Program providing free of charge internet access for several hospitals pediatric ward nationwide. Where the fixed internet network is not yet available, the SZIP Mobile internet tariff package can be ordered for the addresses defined in the SuperFast Internet Program (SZIP).

Non-profit organizations

In 2021 Magyar Telekom announced a tender among non-governmental organizations. As part of the Magenta 1 Business / Nonprofit offer, the company provides mobile and fixed services to 38 organizations free of charge for 12 months.

Suppliers

In the framework of the sustainable supply chain management process Magyar Telekom assesses the sustainability performance of its suppliers each year. This will be done independently by Magyar Telekom, in addition to the suppliers that are shared with Deutsche Telekom but are not assessed in the Ecovadis system. In 2021 through completing a web audit questionnaire – that contains questions on general, environmental, social and business ethical topics – 20 suppliers were assessed and so 56,92% of the total purchase value has been covered by valid web audit assessments.

Future generations

One of the main objectives set forth by Magyar Telekom's Sustainability Strategy launched in 2016 is to achieve improvement of qualification of 1 million people in Hungary by 2020. The target has been achieved, among other things, by industry-specific succession development programs like Be an IT Professional!, educational events like the NOW Forum and digital education programs like Be a Member of the NOW Generation! In view of the COVID-19 virus and the changes in the education system and communication habits, Magyar Telekom's programs have also been renewed and moved to a new interface.

The education and digital inclusion are also an integral part of the new (2021-2030) sustainability strategy. Accordingly, programs launched in previous years will continue.

On The "LEGYÉLTEIS!" site, the company shared information about internet security which are understandable and followable for both children and parents.

The digital education of the older generation continued, and the company started a representative research to explore the internet-using habits of the under-18s. The research was launched in the professional partnership of the Híntalovon Children's Rights Foundation.

The company also appealed to the younger age group with the launch of the Magenta Podcast channel in March 2020, which covers media consumption, diversity, online education, mental health, technological innovation, cultural and economic topics, but expert guests will also speak on topics such as the home office, digital family or just the COVID-19 pandemic. In 2021, the Podcast was continued to provide regular entertainment and professional content on topics such as digital parenthood, climate protection, fintech, safe internet usage and the Telekom MobilDonor program. A key aspect in the production of the Podcast is to ensure that the guests and experts invited are well-known figures among the younger generations, thus supporting the success of reaching out to this age group.

Charters and initiatives of cooperation accepted and signed by Magyar Telekom Group

Besides professional challenges, the Group also seeks cooperation opportunities for the solution of social and environmental problems.



Magyar Telekom has been an active member of ETNO's (European Telecommunications Network Operators Association) Sustainability Workgroup for years. The members work closely towards solving all kinds of sustainability-related programs.

Magyar Telekom has been the first among the Hungarian companies to accept OECD Guidelines for Multinational Enterprises and set them up as mandatory guidelines for its operations.

European Union's Diversity Charter has been signed by the company and considered as a mandatory guideline.

UN Global Compact has been signed by the company and the "Communication on progress" report on achievements in the 10 principles is published yearly.

Magyar Telekom has acknowledged the UN Sustainable Development Goals (SDG) and through incorporating the priority ones in its Sustainability strategy 2016-2020, and Sustainability Strategy 2021-2030 the company finds the contribution to the goals a mandatory element of its operations.

Magyar Telekom discloses data and information on its climate related activities through the CDP (Carbon Disclosure Project) platform.

Magyar Telekom has been the first Hungarian company to join the Science Based Target Initiative (SBTi) and has emission reduction targets approved by SBTi.

Magyar Telekom has joined the UNFCCC Climate Neutral Now initiative.

Thanks to the United Nations Global Compact and emission reduction targets approved by the Science Based Target Initiative - by achieving the latter, the company can contribute to keep the global temperature rise of the Earth below 1.5 °C – Magyar Telekom became the only Hungarian participant in the UNFCCC Race to Zero campaign in 2020. Since then, 7 more Hungarian companies joined the campaign, but only Magyar Telekom Plc. is still participating.

List of the main memberships:

- European Telecommunications Network Operators Associations (ETNO)
- GSMA Association
- Joint Venture Association (JVSZ)
- German-Hungarian Chamber of Industry and Commerce
- Telecommunication Advocacy Council
- ICT Association of Hungary
- Hungarian Association of International Companies
- Hungarian Competition Law Association
- Employer's Equal Opportunities Forum
- Hungarian Logistics, Procurement and Inventory Management Association
- Hungarian Marketing Association
- Hungarian Advertising Association

Quality guarantees in the Magyar Telekom Group can be found:

https://www.telekom.hu/about_us/about_magyar_telekom/principles/quality_guarantees

7.3 Annual Sustainability Report

Magyar Telekom Group has committed, among other things, to publish reports about its sustainability performance annually. When the reports are compiled the GRI (Global Reporting Initiative) guidelines and standards are applied, thus ensuring compliance with the principle that the reports have to be the cornerstones ensuring transparency and international comparability. The Sustainability report about 2007 was the first report in Hungary which was prepared according to the GRI G3 A+ compliance level, this meant the highest level of application of the GRI G3 guidelines at the time. Since then, Magyar Telekom has produced an annual report with the highest compliance with international guidelines, the 2013 Sustainability Report was the seventh to meet the requirements of the GRI A+ application level.

The 2014 and 2015 Sustainability Report was compiled along the Fourth-Generation Principles set forth by the Global Reporting Initiative (GRI G4), while since 2016 Sustainability reports have been compiled along the newest requirement, the GRI Standard on “Comprehensive” level. The independent assurance and certification of compliance with the GRI Standard criteria was conducted by PricewaterhouseCoopers along the ISAE 3000 international standard. Further details on the sustainability performance of the Company can be found in the annual reports available on:

https://www.telekom.hu/about_us/society_and_environment/sustainability_reports

The 2021 Sustainability Report is going to be published in the first half of 2022.

8 ENVIRONMENT PROTECTION

8.1 Policies

Magyar Telekom Group upholds its commitment to sustainable development and environment protection first in the environmental policy. The policy contains obligations for the members of Magyar Telekom Group both individually and as a Group:

https://www.telekom.hu/static-tr/sw/file/Magyar_Telekom_environmental_policy.pdf

In addition to the policy, it has also issued an environmental directive, which sets out in more detail the company's areas of commitment and expectations:

<https://www.telekom.hu/static-tr/sw/file/magyar-telekom-environment-protection-policy-guidelines.pdf>

The Group-level coordination was continued to be implemented under the auspices of the Sustainability Committee (SC) in 2021, as well. The levels of development and management of the corporate sustainability strategy are separated from the operative implementation level within the operation of the SC, thus the process of implementing sustainability activities is divided to the following levels:

1. Strategy development and strategy management level operating under the auspices of the SC: development of strategic concepts, implementation of the strategy, relevant communication with national and international organizations.
2. Operative implementation level managed by relevant organizations of the governance areas and business units, actual operative activities, task management, data provision etc.

The SC's operation is regulated by a group level directive: on the regulation of Magyar Telekom Group's sustainability operation and the responsibilities and competence of stakeholders.

The operative management of Magyar Telekom Group, the Management receives at least once a year a report on the implementation of the tasks of the Group Sustainability Strategy and other ongoing significant sustainability activities, results, potential exposures and opportunities.

The Management is informed on the latest sustainability trends and may respond to the feedback from stakeholders through the annual report and based on the report may decide on the amendment of the strategy. The Management keeps contact with the stakeholders through the SC. Incoming inquiries are received by the respective professional areas and critical comments regarding sustainability are transferred to the responsible staff members by the SC members. According to the relevant group directive the strategic tasks are allocated to the respective Chief Officers.

In 2021, Magyar Telekom's Leadership Squad decided that, in line with its agile operations, the company would manage sustainability coordination in the form of a squad in the future. Therefore, the role of the Sustainability Committee will be taken over by the Sustainability Squad from 2022 onwards.

8.2 Results of the policies

As a leading provider of info-communications services in the region, Magyar Telekom's commitment to sustainable development with a focus on preserving the environment lies at the center of its mission. 2021 was spent developing a long-term strategy, the company outlined a 5 + 5 year vision instead of the previous 5-year perspectives. Climate protection remains a key priority in the new sustainability strategy. The company's emission reduction commitments pledged in 2018, which was approved by the Science Based Target Initiative (SBTi), were replaced by more ambitious targets in 2019 in response to the IPCC's 1.5 °C report, have come into the main focus of the strategy. The company is working to achieve the following goals by 2030:

- reduce absolute Scope 1 and 2 Greenhouse Gas (GHG) emissions 84% from a 2015 base year;
- reduce absolute Scope 3 GHG emissions 30% from a 2017 base year.

The European Green Deal also prioritizes energy use and emissions of the ICT sector, recognizing that the sector can make a significant contribution to achieving 2050 climate neutrality through 5G, artificial intelligence, IoT and cloud services, but it can also increase its own energy consumption. As a first step, the European Union aims to increase energy efficiency in data centers and achieve climate neutrality by 2030. This is also one of the main pillars of Magyar Telekom's new climate strategy, despite the fact that the Group's total electricity consumption, including data centers, has been covered by renewable energy for many years (since 2016 at Plc., since 2018 in Hungary), which has been set by Deutsche Telekom as a requirement for its member companies on a group-wide basis from 2021 onwards.

In 2021 Magyar Telekom continued its carbon neutral² project. The company spent half of the income of the company car policy regulated bonus-malus system to financial implementation of the project. To achieve the carbon neutrality in 2021 - for the seventh year in a row - Magyar Telekom Group used 99% - the Hungarian member companies 100% - renewable energy for electricity consumption and offset the rest of its emissions, by purchasing and retiring 18,220 CER (Certified Emission Reduction) units from a Chinese green project. In 2021 Magyar Telekom purchased 200,000 MWh of renewable energy with Guarantee of Origin. Our additional highlighted environmental and operational ecoefficiency goals are:

- Increase the energy efficiency of buildings
- Decrease fleet consumption, promotion travel replacement solutions, and dematerialization solutions
- Introduction of sustainable and climate-friendly products and services
- Mapping and quantifying enablement effects in other sectors as a result of the services offered by the company
- Waste management: reduction of waste (increased recycling-rate)
- Measure the climate footprint of customers and suppliers
- Development of a circular economy for appliances provided to customers

8.3 Risks

Based on the Business Continuity Management System (BCM) the company has identified the critical climate risks (floods, heat waves) that might affect our operations and we have prepared action plans for possible risk management. According to the annual assessment the rate of climate damage in the network did not reach the level of intervention (HUF 50 million damage/ month). In 2021, 546 cases had to be investigated due to different problems caused by the weather. During heatwaves, the company allows its colleagues to work remotely and increases the core temperature of datacenters and base stations in order to reduce the energy consumption.

In setting the emission reduction targets, Magyar Telekom has considered the current Paris Climate Agreement and EU standards, as well as the IPCC's 1.5 °C goals, but it is assumed that regulators will set stronger emission reduction targets in the future, which may involve financial risks. Current forecasts predict an increase in the energy consumption of mobile networks with the spread of 5G. However, one of the EU's goals is to significantly reduce energy consumption and plans to regulate data centers as a first step. Thanks to Magyar Telekom's forward-looking climate strategy, it enjoys an advantage over its competitors, even with stricter regulations.

² carbon neutral means net zero GHG emissions

Opportunities

In addition to its energy efficiency investments and carbon neutral operations, the company considers the use of renewable energies to be one of the most effective tools for combating climate change. Its long-term goal is to ensure the supply of electricity to the network as much as possible from renewable energy sources, therefore it has implemented the installation of solar systems in its own buildings in several stages. Magyar Telekom also provides an opportunity for its customers, who also consider combating climate change, to be able to choose a service that contributes to climate protection. That's why in 2019 Magyar Telekom created the world's unique ExtraNet Green 1GB 30-day option. Although the measures taken during the pandemic in 2020 reduced turnover after its success in 2019, the company still retains the option for its customers. In 2021, higher proportion of customers chose this expansion option out of the 1GB options than in previous years.

In 2020, the European Union created the Taxonomy Regulation, which lists environmentally sustainable economic activities. It is an important tool for increasing sustainable investment and implementing the European Green Deal, in particular by providing companies, investors and decision-makers with appropriate definitions of the economic activities that can be considered environmentally sustainable. The purpose of the Regulation is to create security for investors, protect private investors from greenwashing, help companies plan for the green transition, and alleviate market fragmentation. Implementation acts of the Regulation, which will also affect the ICT sector, have not yet been completed, but it is expected that the Magyar Telekom Group's sustainability strategy and its implementation may improve the Company's perception among investors factoring in sustainable investing considerations.

8.4 Performance indicators

Emissions below were calculated according to the GHG Protocol Corporate Standard.

Cumulated GHG emission

- 83,060 tCO₂e (tons of greenhouse gas emissions in carbon dioxide equivalent), when purchased renewable was not taken into account (location based emission)
- 18,220 tCO₂e, when purchased renewable was taken into account (market based emission)

Group GHG emission by categories

- Scope 1: 12,767 tCO₂e (at the moment location based equal to market based)
- Scope 2: 70,293 tCO₂e location based
- Scope 2: 5,452 tCO₂e market based

Energy efficiency – bits transmitted / energy consumption – 301 Gbit/kWh

9 CORPORATE COMPLIANCE

When shaping the compliance program of Magyar Telekom Group, the goal was to ensure that Magyar Telekom Group pursues its business activity with maximum awareness of and commitment to compliance with the applicable laws and legal provisions, in accordance with the strictest norms of ethical business conduct. To this end, we issued policy statements addressing the potentially arising compliance-related risks, and we apply the procedures set out in these policy statements and arrange continuous training courses for our employees related to these procedures. We established clear concise processes to report, examine, follow up and correct suspected cases of non-compliance.

The Corporate compliance program is supervised by the Group compliance officer. The Group compliance officer reports directly to the Audit Committee, and cooperates with the Board of Directors, the Supervisory Board and the management. The Corporate compliance program focuses on the Code of Conduct.

The Code of Conduct of Magyar Telekom Group contains the summary of the compliance requirement within the company, sets common values of the Group and is a key to the strong position, reputation and successful future of Telekom. The Code of Conduct applies to everyone within the Magyar Telekom Group from the employees to the members of the Board. In addition, contracted partners of the Magyar Telekom Group also have to know and accept these values, when registering on the procurement website.

In the year 2010, an external independent party audited the implementation of the Compliance program, and we were awarded a certificate of compliance with the external expectations and of the implementation of the system. The program was revised in 2013, including other related areas as well – such as procurement, internal audit, HR, sales. The audit was not aimed only at the implementation and control of the system in the different areas, but it measured the operational efficiency of the control system. We met the expectations and were awarded by a certificate issued by Ernst&Young as independent external party. In 2017, again an external auditor (KPMG) evaluated the effectiveness of the compliance management system of Magyar Telekom, and issued a certification that the program complies with the requirements of the new anti-corruption ISO standard. In 2021 an external advisor (KPMG Germany) reviewed the Compliance program. They found the operation of the program efficient.

The first distance learning course addressing compliance was started in 2008 in the topic of “Conscious recognition of fraud and corruption”. Since then we have been providing a general eLearning course for our new employees, mandatory for all colleagues joining to the company. The course is completed with the acceptance of the Code of Conduct. Since the start of the program, 95,743 distance learning courses were completed by the employees on group level, related to topics, such as compliance awareness, supplier due diligence, anti-corruption measures, incompatibility or insider trading.

On the top of that, our company has arranged personal training sessions for employees working in professional areas exposed to compliance and abuse related risks – both within the parent company and Hungarian and international subsidiaries – in the topics of organized anti-corruption behavior, screening of contracted partners and rules of giving and accepting gifts.

In 2020 – similarly to the practice of the previous years – risk analyses were conducted with the participation of organizations and subsidiaries of Magyar Telekom Plc. Based on the results of the survey, a comprehensive audit was prepared for the potential compliance and abuse risks, the result of which was submitted to the Audit Committee of the Company.

During the year we check the soundness of the reports submitted to our company in connection with unethical behavior, and if necessary, we act on these reports. In case we identify actual abuses, we take care of the necessary and adequate countermeasures. Magyar Telekom published all cases of corruption and the related countermeasures in accordance with the related applicable laws and legal provisions.

9.1 Fight against bribery and corruption

9.1.1 Policies

Magyar Telekom does not tolerate any attempts of corruption, so numerous procedures and policies were introduced to prevent and fight corruption. Magyar Telekom complies with the anti-corruption rules of the Group, and expects its business partners not to engage in unlawful activities (including breaching the anti-corruption laws) such as utilize any money or other services provided by Magyar Telekom for unlawful purposes. This also includes direct or indirect payments to individual(s) to improve the perception of Magyar Telekom (or any parties acting for Magyar Telekom) or to influence any business decision. Magyar Telekom strictly prohibits any form of corruption including (but not only), receiving personal advantages or monetary gains, accepting or providing bribes or promising facilitating payments. The Group also prohibits employees from making beneficial decisions towards family, friends or close or distant acquaintances. It is not allowed to provide any gift or invitation to an event to third parties if it could potentially influence any business transaction. Magyar Telekom Group does not support morally or financially any political parties, organizations or representatives of these. Magyar Telekom will not start business relations with third parties that violate the anti-corruption clauses of the Compliance Program or the basic principles of the Code of Conduct.

Due Diligence procedures: There are no fixed procedures on how thorough due diligence should be to avoid legal responsibility or any investigation as per the anti-corruption laws. The aim of these procedures is to identify high-risk areas, and to provide indication when further due diligence or review is required.

9.1.2 Result of the policies

During the year, we have verified the plausibility of any complaints we have received about unethical behavior and initiated internal investigations if necessary. If we have identified any misconduct we initiated the necessary measures and actions. Any complaints regarding breaches of internal or external rules can be sent to the Tell Me! portal of Magyar Telekom. Any questions regarding corporate compliance can be asked on the Ask Me! intranet portal.

9.1.3 Risk

The basis and prerequisite of the efficient defense against breaches of laws and policies is the registering and analysis of compliance risks and identifying other compliance relevant cases at Magyar Telekom. The yearly Compliance Risk Assessment (CRA) handles active and passive corruption separately. The risk assessment always includes Magyar Telekom, T-Systems and Makedonski Telekom. Other subsidiaries can be included on a case-by-case basis, based on information originating from internal investigations. The CRA fully covers the abovementioned companies. The Group Compliance Officer informs the Audit Committee, the Board of Directors, and the management about the result of the risk assessment and gives an update about the status of the measures in every quarter.

10 ECONOMIC ENVIRONMENT AND OUTLOOK

The global environment in 2021 showed dynamic recovery from the recession hitting the worldwide economy in 2020 with the outbreak of the COVID-19 pandemic. The targeted government measures along with the more efficient management of the pandemic led to improved production as well as higher consumption levels. However, the still prevailing pandemic has been reshaping the environment whereas some new economic difficulties has also emerged with global supply chain disturbances and the sharp increase in energy prices witnessed in the second half of 2021.

The telecommunication industry has continued to play a critical role in keeping families connected and businesses and the economy progressing in this changing environment. The need for digitalization, demand for data and the use of online, virtual channels have reached unseen levels, highlighting the integral role of the global telecommunication industry.

10.1 Economic environment and outlook

Similarly to 2020, economic performance in 2021 was heavily impacted by the COVID-19 pandemic. First quarter of the year has been challenging as the emergence of a third wave of pandemic proved to be more severe than previous rounds, with stringent restrictive measures also negatively impacting economic performance. However, from mid-April on, thanks to the increasing vaccination rates, the restrictions were gradually lifted. This, coupled with the supportive governmental measures led to a strong rebound in economic performance witnessed in the outstanding second quarter GDP growth figure. By the third quarter of 2021, all limitations were removed supporting service sector recovery, with particularly positive impact witnessed in tourism. Although Hungary was hit by the fourth wave of pandemic in the autumn, only few limitations were introduced. Consequently, economic performance in the second half of the year continued its positive development, however now paired with strong inflationary pressure stemming both from global raw material and energy price increase as well as from the weakening of the forint.

In 2022, GDP is expected to continue to expand further fueled by domestic demand and expansionary fiscal measures. At the same time, yields are expected to increase further in line with the central bank's rate hike steps and inflation is also forecasted to remain at higher levels with prolonged supply-chain constraints, elevated energy prices and pandemic-related uncertainty posing further risks to economic performance.

With regards to the Hungarian telecommunication sector, the easing of the pandemic related restrictions coupled with strong economic performance, have resulted in a favorable development in the operating environment. However, within the sector we have been witnessing changes in the competitive landscape that warrant attention.

Looking ahead, while there are significant uncertainties related to the economic and business developments, demand for telecommunications services expected to remain strong with digitalization continuing to be of vital importance. To ensure the reliability and security of our networks and our leading position on the market, the management remains committed to invest in our infrastructure and continue with the customer centric operational approach going forward.

11 INTERNAL CONTROLS, RISKS AND UNCERTAINTIES

11.1 The presentation of the systems of internal controls and the evaluation of the activity in the relevant period

Magyar Telekom's management is committed to establishing and maintaining an adequate internal control system to ensure the reliability of the financial reports and minimize operating and compliance risks. Our internal control system is designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in conformity with International Financial Reporting Standards (IFRS) as adopted by the European Union.

For the business year 2021 we accomplished control documentation and evaluation in the IT supported ICS-Toolⁱ system. Transaction Level Controls describe the controls built into our business processes that have been designed and operated to ensure that material misstatements in each significant financial account and disclosure within the financial statements are prevented or detected in a timely manner.

Complete evaluation of our internal control system is based on the method established in “Internal Control—Integrated Framework” issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). The operation of the internal control system is supported also by the independent internal audit function. Beyond tasks regarding the risk based internal audit work plan, contributes to the enhancement of the internal control processes and to the reduction of existing risks through ad-hoc audits and ICS testing. The Internal Audit area follows up the implementation of the measures defined on the basis of the audits. The Supervisory Board and the Audit Committee inter alia also receive regular reports on the findings of the audits; measures, based on the findings and fulfilment of tasks.

In line with the criteria of the adopted internal control framework, management evaluates the effectiveness of internal control system within each financial year. Management’s assessment for 2021 is finished and based on the collected information internal control system has been operating effectively to prevent potential material misstatements in the financial statements, and minimize operating and compliance risks.

The Company’s shareholders are being informed about the operation of our internal control system through our public reports.

The management and Board of Directors of Magyar Telekom are committed to conducting all business activities of Magyar Telekom Group according to the highest legal and ethical standards. Based on this commitment, the Board of Directors established the Corporate compliance program of Magyar Telekom.

The Corporate compliance program is applicable to all bodies, organizations, employees of Magyar Telekom Group, and advisors, agents, representatives as well as to all persons and organizations that work on behalf of the Company or its subsidiary.

The Corporate compliance program of Magyar Telekom ensures that the business activities of the Group are conducted observing and in compliance with the relevant laws to the utmost extent, according to the highest standards of training and commitment. It requires the realization of guidelines and processes that manage potential compliance risks and implement specific processes in order to report, investigate, monitor and correct suspected or actual lack of compliance.

11.2 The utilization of financial instruments, risk management and hedging policies

Introduction

As Hungary's leading telecommunications and IT service provider we are subject to uncertainties and changes of the telecommunications and IT industry. To operate successfully in this continuously changing environment risks have to be systematically identified, assessed and managed.

The risk management system is not only needed from a business point of view, but as a company listed in the stock market, we are obliged to operate a risk management system and prepare a risk report to inform our investors.

Upon the establishment of our comprehensive risk management system the Company acts in line with the relevant requirements of the Budapest Stock Exchange, as well as the rules laid down in the applicable international standards.

Our Group level risk management system covers strategic, operational, financial, compliance and legal risks, which is also applicable to our consolidated companies. The objective is to identify, monitor and manage these risks in an early phase.

Risk management guidelines

It is our policy that all disclosures made by us to our shareholders and the investment community, are accurate and complete, and fairly present our financial condition and results of operations in all material respects. Such disclosures should be made on a timely basis as required by applicable laws, rules and regulations. To achieve these objectives, we continuously develop and regularly review the functionality and effectiveness of the elements of our risk management system.

ⁱ Internal Control System

Our risk management includes the identification, assessment and evaluation of risks, the development of necessary action plans, as well as the monitoring of performance and results.

The risk management organization and process:

Magyar Telekom performs its risk management activities in accordance with the risk management guidelines developed by the Group level risk management organization and approved by the Boards of Directors.

The risk owners of the individual organizations are responsible for identifying, reporting, assessing and monitoring risks on a continuous basis, in line with the framework of the risk management process, under the governance of the central risk management organization.

Magyar Telekom's Group level risk report is regularly submitted to the Board of Directors, the Audit Committee and the Supervisory Board as well as to Deutsche Telekom's risk management organization.

During the annual planning process the management takes into account potential risks.

The established risk management standard provides a process framework:

- following the identification of risks, they are analyzed, assessed and quantified in details, then they are quantified (by estimating their probability of occurrence and potential impact) according to a predefined methodology. The assessment of risk assessment enables the management to focus more effectively on those risks that have a significant impact on the company's strategic objectives.
- following the assessment, the decision is made on the specific measures to reduce risks,
- the relevant risk owner implements, monitors and evaluates the relevant measures, and
- these steps are repeated as necessary to reflect actual developments and decisions.

For the risk management to be effective, Telekom must ensure that the management takes business decisions with full understanding of all relevant risks that we support through Magyar Telekom's regular Group level risk report.

Identification, review and reporting of risks:

Risk items affecting our operations are reviewed regularly throughout the Company. All of our subsidiaries and entities are obliged to identify and report their operational risks on a quarterly basis. After the evaluation of these risks, results are reported to the Company's management, to the Board of Directors, to the Audit Committee and the Supervisory Board. This regular reporting ensures that the most significant risks are monitored, up-to-date risk mitigation measures are implemented and regularly monitored.

Our risk reporting system is complemented with a continuous reporting procedure which requires all of our departments and subsidiaries to report on a real-time basis any new material fact, information or risk that comes to their knowledge. Information thus submitted is monitored and evaluated by the risk management area and the Chief Financial Officer is notified when a new material risk or information is identified.

An internal regulation has been issued to define responsibilities of each employee in risk monitoring and management.

The risk assessment is carried out for a two-year period. This is also our forecast period. If there are significant risks beyond the forecast period, such risks are monitored on a continuous basis.

Opportunities

Besides the systematic management of risks the identification of opportunities and their strategic and financial assessment are also essential parts of our annual planning process. This allows us to take these opportunities into account in our forecasts.

11.3 Main risk factors

Our financial condition, results of operations or the trading prices of our shares could be materially adversely affected by any of the risks described below. These risks are not the only risks we face. Additional risks not currently known to us, or risks that we currently regard as immaterial, could also have a material adverse effect on our financial condition, results of operations or the trading prices of our shares.

Regulatory risks

- Magyar Telekom operates within a strictly regulated market environment. Most of the regulatory framework is the result of EU legislation. Hungary implemented the new EU regulatory framework (1972/2018/EU) by end of 2020.

Risk management activities:

- We cooperate and maintain an active dialogue with regulators.
- We maintain processes to ensure compliance and provide timely and accurate information to our regulators.

Legal risks

- Regulatory cases and legal disputes with parties could have an effect on our results of operations.

Risk management activities:

- Protecting our interest and values through legal representation, continuous management and monitoring of legal disputes.
- See also the compliance risk management activities.

Financial risks

- For details on financial risks and their management, see Note 5 of the Financial Statements.
- Developments in the technology and telecommunications sectors may result in impairment of the book value of certain of our assets.
- Unpredictable changes in the Hungarian tax regulations may have an adverse effect on our results.
- Fluctuations in the currency exchanges rate could have an adverse effect on our results of operations.
- Economic trends in Hungary and in other countries could have an adverse impact on the value of our investments, operating results or financial situation.
- The increasing trend of inflation, with limited predictability could erode Magyar Telekom's results.
- The global energy crisis has emerged recently, with the prices of several major energy commodities and electricity rising sharply, the significant price increasing affecting several products, including natural gas, oil, coal and electricity. Rising energy prices can lead to unexpected costs.

Risk management activities:

- We continuously analyze financial actual data and provide forecasts on financial indicators.
- We carry out sensitivity analyses (e.g. foreign exchange, cash flow).
- We test all key controls on an annual basis.
- We continuously improve our processes, systems for the purpose of automated accounting, reporting and auditing.
- We constantly monitor energy prices to ensure that we purchase energy at a proper price level.

Strategic risks

- We are subject to intense competition in the fixed business due to overlaps with our competitors on more and more locations as a result of the network roll-outs.
- We are subject to intense competition in SI/IT segment, especially on public sector tenders.
- Adaption to new trends and technological changes in the telecommunications market (IoT, Big Data, AI, 5G) might be a serious challenge.
- Our business may be adversely affected by actual or perceived health risks associated with mobile communications technologies, and unsubstantiated and rapidly spreading news about new technologies.
- Sustainability: information on the Company's approach to sustainability risks and opportunities can be found in Note 7 "Sustainability" of the Business Report.

Risk management activities:

- We continuously invest in the development of our network, our objective is to have the best convergent network in Hungary.
- We transform our internal processes to be even better prepared for future challenges.
- We monitor technological developments and our competitors' activities.
- We pursue responsible and sustainable business activities.

- In order to maintain trust and reputation we continuously inform our key stakeholders on our plans, risks and achievements.
- We integrate digital initiatives into our long-term planning and align their technology and business strategies.

Operational risks

- The future of our current operational model is subject to currently unforeseeable changes in the future business environment.

Risk management activities:

- We have a flexible business model. We closely monitor the competitive environment in all markets and respond accordingly to both consumer and business segment needs.
- Our price offers are competitive in the markets where we operate.
- We support our business customers with our innovative products to increase efficiency.
- We transform our internal processes to be even better prepared for future challenges.
- The pandemic continues to make a big impact worldwide and also to our entire risk environment.

Risk management activities:

- Reacting to COVID-19 has become part of our everyday operation. Due to the nature of the telecom industry and the importance of communication services in the pandemic we continuously strengthen our digital strategy.
- Magyar Telekom continues to successfully operate and provide the capacity of its network infrastructure and ensures the health and productivity of employees by enabling teleworking.
- System failures could result in reduced user traffic and revenue, could lead to penalties and could harm our reputation.

Risk management activities:

- We operate network monitoring systems and define recovery goals to minimize service outages.
- We consider it of key importance to inform our customers in a timely manner about service problems thus we operate an advanced information system.
- Loss of key personnel could weaken our business.

Risk management activities:

- Operation of an advanced human resources strategy, for further details see Note 3 (“Social commitments, labor standards, human rights”) of the Business Report.
- The number of cyber attacks has increased significantly in the whole world. Cybersecurity risks have worsened due to the pandemic, as work, shopping, social interactions and education have become significantly digitized. The quick change increased the vulnerability of organizations to cyber attacks. Also, teleworking may increase the risk of fraud and misuse of business information and data, as well as unauthorized access, theft and fraudulent use of data. Although Magyar Telekom provides services with highest security-standards and constantly tests and updates its cyber security countermeasures, it cannot be fully excluded that the Company will be subject of a cyber attack. If we fail to manage this effectively, it may have significant customer related, financial, reputational or regulatory consequences.

Risk management activities:

- We perform regular audits on key security risks affecting our business and maintain strategies to identify, prevent and respond to these challenges.
- Our cybersecurity approach focuses on minimizing the risk of cyber security incidents impacting our networks, systems and services.
- We promote conscious conduct among our colleagues via communication, campaigns and training.

- Data protection incidents are punishable with very high fines. Despite mitigating measures and well-designed data protection management structures data protection incidents and compliance deficiencies cannot be entirely excluded. There may be problems that can have a negative impact on Magyar Telekom's reputation and may incur costs and sanctions (including fines).

Risk management activities:

- In order to ensure data protection compliance and to avoid sanctions (fines) we must pay special attention to the principle of purpose limitation, privacy by design, privacy by default as well as data security measures to avoid system failures that may impact a large number of subscribers or employees.
- We regularly provide our colleagues data protection and data security trainings and other tools to help them make better and risk-conscious decisions.
- Procurement and supply chain: we cooperate with a wide range of vendors. High risk products and services include hardware, network technology components, and all products and services provided directly to end users. Supply risks cannot be entirely avoided. Epidemics, transportation bottlenecks, price increases, changes in the economic or political environment or the suppliers' product strategies may have a negative impact on our business processes and results. Further risks may arise from dependencies on specific suppliers or from their default.

Risk management activities:

- In order to reduce our exposure to risks we implement organizational, operational and profession-specific procurement strategies. Our procurement processes are planned and are monitored through regular internal and external controls. Key professional factors for managing procurement risks: proactive management of the supplier base, supplier segmentation, risk analysis of strategic and critical suppliers and continuous active contact keeping together with the business areas.

Compliance risks

- Violation of laws may result in loss of trust, financial sanctions, impairment of our shareholder value and other sanctions. Serious violation of laws may lead to criminal proceedings, litigation and regulatory actions.

Risk management activities:

- We operate a compliance framework program for the identification, regular assessment and mitigation of risks.
- We train our employees, run awareness raising programs that explain our ethical norms throughout the organization and help the employees to understand their role in ensuring compliance.
- We support a culture where our colleagues can voice their concerns, so we can identify problems and prevent them from happening again.

11.4 Financial risk management

The classification of the Company's financial instruments is described in detail in Note 4 and the financial risk management of the Company is described in detail in Note 5 of the Financial Statements.

12 ANALYSIS OF FINANCIAL RESULTS FOR 2021

12.1 Revenues

Total revenues increased from HUF 524.1 billion in 2020 to HUF 548.3 billion in 2021, driven primarily by the growth in mobile data and fixed broadband revenues.

Mobile revenues increased to HUF 350.0 billion in 2021 compared to HUF 328.3 billion in 2020, reflecting the continued positive momentum in mobile data usage.

- Voice retail revenues declined by 4.3% to HUF 105.9 billion in 2021, reflecting tariff pressure.

- Voice wholesale revenues rose by 6.5% to HUF 8.9 billion in 2021, reflecting an increase in incoming mobile traffic.
- Data revenues grew by 17.1% to HUF 108.8 billion in 2021, driven by the continued growth in subscriber numbers and strong demand for mobile data usage that was amplified by the pandemic induced social distancing measures.
- SMS revenues increased by 17.3% to HUF 22.6 billion in 2021, primarily as a result of further growth in mass messaging revenues coupled with higher usage driven by the increasing retail postpaid customer bases.
- Mobile equipment revenues increased by 7.3% to HUF 94.5 billion in 2021, driven primarily by increase in the average handset prices coupled with higher volume of export sales.

Fixed line revenues increased to HUF 187.9 billion in 2021, up from HUF 185.0 billion in 2020. The significant improvements in broadband and TV revenues fully offset the decline in voice revenues.

- Voice retail revenues decreased by 7.1% to HUF 31.2 billion in 2021, primarily due to a further decline in the customer base.
- Broadband retail revenues increased by 10.6% to HUF 53.1 billion in 2021, thanks to further growth of the customer base that was coupled with continued strong demand for bandwidth upgrade transactions. These positive developments fully compensated for the temporary fallout in some of the retail broadband revenues for the first half of 2021 due to the mandatory monthly fee allowance introduced for students and teachers to help with online education during the pandemic.
- TV revenues increased by 9.1% to HUF 46.7 billion in 2021, thanks to higher revenues reflecting the continued expansion of the IPTV customer bases.
- Fixed equipment revenues declined by 13.6% to HUF 18.7 billion in 2021, reflecting lower volume of the equipment sold.
- Data retail revenues rose by 2.9% to HUF 10.2 billion in 2021 thanks to higher revenue from leased line fixed internet services.
- Wholesale revenues were down by 2.3% to HUF 12.8 billion in 2021 reflecting lower voice services revenue partly offset by higher network-related revenue.

System Integration (SI) and IT revenues recorded a decline of 4.1% to HUF 10.4 billion in 2021, compared to HUF 10.9 billion in 2020, driven by moderately lower project volumes in Hungary.

12.2 Direct costs

Direct costs increased from HUF 221.0 billion in 2020 to HUF 233.3 billion in 2021, primarily due to higher equipment and interconnect costs.

- Interconnect costs grew by 14.3% to HUF 19.2 billion in 2021, as increased off-network mobile voice traffic led to higher payments to domestic mobile operators.
- SI/IT service related costs declined by 7.8% to HUF 8.6 billion in 2021, reflecting lower volume of related projects during the year.
- Bad debt expenses were up by 14.3% to HUF 9.8 billion in 2021 due to a forward-looking impairment recognized in the amount of HUF 3.2 billion reflecting a possible deterioration of the solvency of our customers driven by unfavorable macroeconomic developments coupled with the termination of loan moratorium in Hungary expected for mid-2022. This offset the positive impacts of factoring and favorable aging of mobile receivables.
- Telecom tax was lower by 2.9% at HUF 26.8 billion in 2021, reflecting the absence of a one-off non-recurring adjustment booked in 2020.
- Other direct costs increased by 6.5% to HUF 168.9 billion in 2021, driven primarily by higher equipment costs coupled with an increase in roaming and TV content outpayments.

12.3 Gross profit

Gross profit increased to HUF 315.0 billion in 2021, from HUF 303.2 billion in 2020, reflecting the increase in revenues.

12.4 Employee-related expenses

Employee-related expenses improved by 3.3% year-on-year to HUF 56.1 billion in 2021, reflecting the combined impact of the reduction in overall headcount and lower severance expenses.

12.5 Other operating expenses

Other operating expenses declined moderately from HUF 64.9 billion in 2020 to HUF 63.7 billion in 2021 thanks to broad based cost saving measures implemented during the year that resulted in lower advisory and maintenance costs. Hungarian utility tax was broadly stable at HUF 7.2 billion.

12.6 Other operating income

Other operating income decreased to HUF 3.3 billion in 2021 from HUF 5.0 billion 2020, reflecting primarily lower one-off profits realized from the sale of real estate.

12.7 EBITDA

EBITDA grew to HUF 198.4 billion in 2021 versus HUF 185.3 billion in 2020, thanks to higher gross profit coupled with indirect cost savings.

12.8 Depreciation and amortization

Depreciation and amortization (D&A) expenses rose to HUF 122.7 billion in 2021 from HUF 116.9 billion in 2020. Higher D&A expenses were related to capitalization and shortened useful life of softwares.

12.9 Operating profit

Operating profit rose from HUF 68.4 billion in 2020 to HUF 75.7 billion in 2021 thanks to the improvement in EBITDA partly offset by higher D&A expenses.

12.10 Net financial result

Net financial result improved considerably from HUF 23.6 billion loss in 2020 to HUF 13.0 billion loss in 2021. Although interest expenses increased due to higher spectrum payment liabilities, more favorable results on the recognition of derivatives at fair value reflecting shifts in the relevant yield curves and the absence of significant negative impacts stemming from the weakening of the forint against the euro during 2020 led to a significant annual improvement.

12.11 Income tax

Income tax expense rose from HUF 12.2 billion in 2020 to HUF 13.9 billion in 2021 driven by the higher profit before tax.

13 EVENTS AFTER THE REPORTING PERIOD

There were no significant events after the reporting period.

Budapest, February 23, 2022



Tibor Rékasi

Chief Executive Officer, Board member



Daria Aleksandrovna Dodonova

Chief Financial Officer, Board member

Declaration

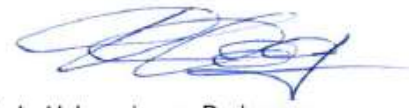
We the undersigned declare that

- the attached annual financial statements which have been prepared in accordance with the applicable set of accounting standards and to the best of our knowledge, gives a true and fair view of the assets, liabilities, financial position and profit or loss of Magyar Telekom Plc. and
- the business report gives a fair view of the position, development and performance of Magyar Telekom Plc., together with a description of the principal risks and uncertainties of its business.

Budapest, March 8, 2022



Tibor Rékasi
Chief Executive Officer,
Member of the Board



Daria Aleksandrovna Dodonova
Chief Financial Officer,
Member of the Board