

Publication Rules

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1. Purpose of the Publication Rules

The purpose of these Publication Rules is to set out the rules governing the operation and use of the website designated for the publication of inside information, for the purpose of fulfilling the obligation to publish inside information.

2. Subject matter of the Publication Rules

The Publication Rules govern in detail:

- the procedure for its preparation, amendment and publication;
- the registration procedure required for the use of the Publication Website;
- the method for calculating and paying the fee payable by a Market Participant within the meaning of the Commission Delegated Regulation (EU) 2026/255 of 30 January 2026 supplementing Regulation (EU) No 1227/2011 of the European Parliament and of the Council as regards the necessary details for the authorisation and supervision of inside information platforms and registered reporting mechanisms by the European Union Agency for the Cooperation of Energy Regulators (hereinafter: REMIT) to the licensed operator of the organised electricity market;
- the provisions on data processing and data security applicable in connection with the operation of the Publication Website;
- the obligations of HUPX Hungarian Power Exchange Company Limited by Shares, acting as the Operator, as well as the services provided by it;
- the obligations of Market Participants registered on and using the Publication Website, as well as the conditions for the use of the services provided by the Operator.

3. Definitions used in the Publication Rules

Terms not defined in the Publication Rules shall be interpreted in accordance with the provisions of the applicable regulatory framework set out in Section 9.

ACER: the European Union Agency for the Cooperation of Energy Regulators.

Annual Fee: the fee paid annually to the Operator by Market Participants registered on the Publication Website, which entitles the Market Participant to publish on the Publication Website during the relevant calendar year, irrespective of the number of Publications.

User: a person authorised by a Market Participant that is subject to a Publication Obligation, is registered on the Publication Website and has a valid contract with the Operator and who lawfully acts on behalf of that Market Participant.

Market Participant: a person as defined in REMIT.

Erroneous Publication: a Publication as a result of which information is published on the Publication Website with an incorrect name, number or other typographical error, a calculation error, or is incomplete.

Authority: the Hungarian Energy and Public Utility Regulatory Authority.

Official Publication Language: English, as required by the applicable legislation.

Publication: the uploading of inside information by the User to the Publication Website in accordance with the applicable requirements.

Publication Website: the publication website governed by REMIT and the applicable legislation, on which Market Participants are required to publish inside information.

Publication Obligation: the obligation of a Market Participant, as laid down by applicable Hungarian and European Union law, to publish inside information on the Publication Website.

Publication Rules: the rules concerning the use of the Publication Website governed by REMIT, Commission Delegated Regulation (EU) 2026/255 of January 2026 supplementing Regulation (EU) No 1227/255 of the European Parliament and of the Council as regards the necessary details for the authorisation and supervision of inside information platforms and registered reporting mechanisms by the European Union Agency for the Cooperation of Energy Regulators, and the applicable legislation.

Registered Visitor: a natural or legal person registered on the Publication Website who browses the Publication Website and reads published information but is not entitled to make Publications, and who, compared to an Unregistered Visitor, has the additional rights specified in Section 6.1.1 of these Publication Rules.

Unregistered Visitor: a person who visits and browses the Publication Website and reads published information without being registered on the Publication Website and who is not entitled to make Publications.

Modified Publication: the Publication resulting from modification of the formerly published information.

REMIT: Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency.

Registration Form: the form available on the Publication Website for requesting the right to make Publications on the Publication Website.

Contractual Documentation: the package of documents sent to the Market Participant during the registration process.

Operator: the licensed operator of the organised electricity market entrusted with operating the Publication Website, as well as, in relation to the services provided by it, any service provider engaged by the licensed operator of the organised electricity market.

Service Disruption: a temporary or permanent malfunction in the IT system of the Market Participant or the licensed operator of the organised electricity market, including its service provider, as well as a period of maintenance, where the IT system is unable to ensure Publication. The types of Service Disruption are:

Access Error: temporary or long term malfunction of the Market Participant's IT system.

Malfunction of the Publication Website: temporary or long term malfunction of the Operator's IT system.

Maintenance suspension: scheduled maintenance carried out by the Operator affecting the Publication Website, during which the Operator is unable to provide the Market Participant's Users with the ability to make Publications or access them.

4. Official data of the Operator

Company Name:	HUPX Magyar Szervezett Villamosenergia-piac Zártkörűen Működő Részvénytársaság
Abbreviated company Name:	HUPX Zrt.
Registered address:	1134 Budapest Dévai u. 26-28.
Postal address:	1134 Budapest Dévai u. 26-28.
Registry number:	01-10-045666

The court maintaining the company
reistry:

Fővárosi Törvényszék Cégbírósága

Statistical code:

13967808-3514-114-01

Tax number:

13967808-2-41

5. Service Operation

5.1. Summary description of the service

The Operator shall ensure the operation of the Publication Website for the publication of inside information, either directly or through a service provider notified to the Authority, using equipment owned by itself or by a third party, on a non-discriminatory basis and in accordance with the applicable legislation.

The Operator shall ensure that no conflict of interest exists in respect of the responsible employees and service providers involved in the provision of this service, and that they are able to perform their duties independently, with appropriate organisational, supervisory and information-flow separation from other business functions.

The following general activities shall be performed in connection with the use of the Publication Website:

- A. Operation of IT infrastructure: performance of the operational tasks of the hardware and software infrastructure required for operation of the Inside Information Website. Installation, operation and monitoring of the environments required for operation of the Inside Information Website;
- B. Maintenance of IT infrastructure: performance of maintenance activities related to the Publication Website;
- C. Archiving: saving (backup) of the data published on the Inside Information Website and retaining these for the period of five years;
- D. Error Handling: receipt of error reports through the designated channels, troubleshooting and correction of errors and, where necessary, communication with the User during the specified customer service hours;
- E. Access management: provision of appropriate access right to the Users for the purpose of complying with applicable Hungarian and European Union legal requirements;
- F. The Market Participant shall notify the Operator in writing if a User's access to the Publication Website is required to be deleted or blocked due to the

termination of employment or for any other reason. The Operator shall not be liable for any security risks resulting from the Market Participant's failure to provide such notification. The User shall be responsible for keeping their personal password confidential. The Operator shall not be liable for any damage resulting from the disclosure of the password;

- G. Development of IT infrastructure: performance of development and expansion activities relating to the Publication Website and the hardware and software infrastructure used for its operation.

The following are not ensured by the Operator:

- retention of data stored in the system beyond the statutory retention period;
- training of Users.

5.2. Provisions applicable to Service Disruptions

In the event of a Service Disruption, the Operator shall publish a notice on the Publication Website and shall also notify Users by email of the manner in which they may fulfill their Publication Obligation. In accordance with the applicable legislation, during the Service Disruption Users shall publish the inside information subject to the Publication Obligation in a clearly visible place on their own website and, at the same time, send it to the Authority at remit@mekh.hu.

Following the resolution of a Service Disruption affecting the Publication Website, Users shall upload to the Publication Website, within 24 hours, any inside information subject to the Publication Obligation made during the Service Disruption.

Where the Service Disruption occurs on the Operator's side, the Operator shall, following its resolution, notify the Users by email that access to the Publication Website has been restored. The Users shall fulfill their retrospective upload obligation within 24 hours from the the time of such notification.

5.3. Maintenance and halt

The Operator shall carry out scheduled maintenance on the Publication Website from time to time, as a result of which the Publication Website may become partially or completely unavailable.

The Operator shall publish a notice on the Publication Website for Market Participants and Users no later than five business days before the scheduled maintenance. The notice shall include:

- the planned start time of the maintenance;

- the planned end time of the maintenance;
- where the Publication Website is expected to be only partially available during the maintenance period, the functions expected to remain available and those expected to be unavailable;
- the manner in which Users may fulfil their Publication Obligation.

In accordance with the applicable legislation, during the maintenance period Users shall publish the inside information subject to the Publication Obligation in a clearly visible place on their own website and, at the same time, send it to the Authority at remit@mekh.hu.

Following the end of the maintenance period, as specified in the notice published on the Publication Website and sent by email, Users shall, within 24 hours, upload to the Publication Website any inside information published during the maintenance period.

6. Cooperation and service management

6.1. Registration procedure

In order to apply for the right to publish on the Publication Website, the Market Participant shall first complete the Registration Form available on the Publication Website and upload the following to the Publication Website:

- a) a certified extract from the company register issued no more than 30 days prior to submission;
- b) a specimen signature (authenticated by a notary public) or a signature sample (countersigned by an attorney at law) of the person(s) authorised to represent and sign on behalf of the Market Participant¹;
- c) authorizations granted by the Market Participant to the Users, duly signed on behalf of the Market Participant;
- d) where the Market Participant carries out an activity subject to licensing, a non-certified copy of the valid licence issued by the Authority.

Where the documents specified in points a)-c) are not uploaded in electronically authenticated form or with a qualified electronic signature (QES), the original hard-copy documents shall also be submitted to the Operator by post.

The official language of the Publication Website shall be English. This requirement shall also apply to the Registration Form.

¹ Where a person authorised to sign on behalf of the company intends to exercise User rights, the submission of a power of attorney shall also be required..

Following the completion of the Registration Form, the Operator shall, as part of the registration procedure, send an email to the email address provided by the Market Participant containing:

- a) the Contractual Documentation, which shall be returned to the Operator in one of the following forms:
 - i. completed in hard copy and duly signed by hand on behalf of the company,² and sent by post in two copies to the Operator's address together with the original copies of the documents uploaded when completing the Registration Form, or
 - ii. signed on behalf of the Market Participant with a qualified electronic signature (QES) and sent to the email address designated by the Operator for this purpose .
- b) a link through which the Market Participant shall confirm the registered email addresses.

The access rights required for the use of the functions of the Publication Website shall only be granted after the required Contractual Documentation has been returned to, reviewed and accepted by the Operator. Upon submission of the complete documentation required under the Publication Rules, the Operator shall be entitled and obliged to approve the registration and grant the relevant access rights to the Market Participant / User for the use of the Publication Website. The Operator shall only perform a formal review of the data provided and the documents submitted to it.

Following a successful completion of the registration procedure, the relevant access rights shall be granted and the publication function of the Publication Website shall become available to the Market Participant / User.

The Market Participant / User shall be authorised to use the Publication Website no later than the 20th working day following the Operator's receipt of the complete Contractual Documentation. Any period commencing on the date on which the Operator requests the remedy of deficiencies and ending on the date on which the Market Participant / User remedies such deficiencies shall not be included in the calculation.

² Signature of a natural person authorised to represent the Market Participant and the company seal.

6.1.1. Rights of the Registered Visitor

In addition to the rights of available to an -unregistered Visitor, a Registered Visitor shall be entitled to:

- a) request API access;
- b) request and use an API key;
- c) select whether the data available on the Publication Website are displayed in UTC or CET time format.

Registration shall not entitle the Registered Visitor to make Publications or to modify the content of the Publication Website.

6.1.2. Registration for API access

In order to use API access, a visitor shall register on the Publication Website.

The registration process may be initiated by selecting the “Registration” function on the Publication Website. On the interface displayed, the visitor shall select the “API access” option.

During the registration, the visitor shall provide:

- first name;
- last name;
- email address.

After the required data have been provided and the registration has been submitted, the Publication Website shall confirm that the registration process has been initiated. The system shall send a verification link to the email address provided.

In order to complete the registration, the visitor shall set a password for their account using the verification link sent by email.

Upon successful completion of the registration, the visitor shall become a Registered Visitor and shall be entitled to use the functions subject to registration as specified in these Publication Rules, including, in particular, API access and an API key.

6.1.3. Partner registration

In order to apply for the access required to publish as a partner, the visitor shall initiate a partner registration on the Publication Website.

The registration process may be initiated by selecting the “Registration” function on the Publication Website and then selecting the “Partner publication” option.

The partner registration consists of several steps.

1. Company details

The registrant shall provide, in particular:

- the company name;
- the abbreviated company name;
- the registered office of the company;
- the address of the company;
- the telephone number of the company;
- the email address of the company.

During the registration process, the required company documents shall also be uploaded, including, in particular, the extract from the company register and the specimen signature. The registrant shall also indicate whether the contact details provided are suitable for receiving official communications from the Operator.

2. Billing details

The registrant shall provide the information required for billing purposes, including, in particular:

- tax number;
- company registration number;
- name of the billing contact person;
- email address of the billing contact person;
- address of the billing contact person;
- telephone number of the billing contact person.

Where necessary, an additional billing contact person may also be specified.

3. Personal data

The registrant shall provide:

- first name;
- last name;
- email address,

and shall upload the authorisation required for the registration.

Once the required data and documents have been provided and uploaded, the registration may be submitted. The Publication Website shall then confirm that the registration process has been initiated and shall send a verification link to the email address provided.

In order to complete the registration, the registrant shall set a password for their account using the verification link sent by email. As part of the partner registration process, the Operator shall send a contract to the registrant. The registrant shall complete the contract with the required information, sign it and return the signed contract to the Operator.

6.2. Publication procedure

Only the User shall be entitled to make a Publication. The User shall upload the Publication to the Publication Website in both Hungarian and English.

The Operator shall not be entitled to:

- a) publish on behalf of the Market Participant;
- b) modify a Publication;
- c) delete a Publication;
- d) provide Market Participants with information concerning the content of a Publication.

More than one User may upload Publications to the Publication Website on behalf of the same Market Participant. In such case, Users belonging to the same Market Participant may access, on a separate list, the Publications belonging to that Market Participant and may also modify such Publications.

A Publication may be modified in the event of an Erroneous Publication. As a result of the modification, the Modified Publication shall be displayed in connection with the previous Publication in a clearly traceable manner. If an Erroneous Publication is made or a Publication is uploaded improperly, it is not possible to delete the Publication in its entirety.

Once a Publication has been published on the Publication Website, it shall be transmitted to ACER. Where an error occurring during the transmission of a Publication is attributable to the Operator, the Operator shall remedy the error and retransmit the Publication(s) within five (5) working days. Where the error is attributable to the User, the User shall ensure that the Publication is corrected within ten (10) working days.

6.3. Rules of Communication

The Operator shall provide technical assistance in connection with the Publication Website. The Operator shall not provide information concerning the content of the information published.

The Operator shall receive reports concerning the Publication Website through the following channel:

- errors experienced when using the Publication Website may be reported via the email address specified on the Publication Website.

The person submitting the report shall provide the subject matter and reason for the report, a description of the issue experienced, and direct contact details through which that person may be contacted, if necessary, in connection with the report.

The Operator shall send a response to written reports concerning the Publication Website no later than two (2) working days following receipt of the report.

6.4. Cooperation with the Authority

The Operator shall provide the Authority with continuous access to the Publication Website, within the framework of which the Authority shall be entitled to:

- review the content of Publications and make copies thereof;
- review the data provided by Market Participants / Users during registration and make copies thereof.

Visitors may submit reports concerning the content of Publications to the Authority using the contact details published on the Publication Website.

Where the Operator receives a report that falls within the functions and powers of the Authority, the Operator shall forward such report to the Authority.

6.5. Procedure for the preparation, amendment and publication of the Publication Rules

The Operator shall publish the Publication Rules and any draft amendment thereto on the Publication Website fifteen (15) days prior to the relevant date of entry into force and shall simultaneously inform the Authority by submitting the Publication Rules and any amendment thereto.

7. Rules of Data Processing

7.1. Data provision obligations

A Market Participant registered by the Authority pursuant to Article 9(1) of Regulation (EU) No. 1227/2011 of the European Parliament and of the Council (REMIT), concerning the registration of market participants, shall fulfil its obligation under Article 4(1) of REMIT, concerning the obligation to publish inside information, by uploading the inside information to the Publication Website.

The Market Participant shall fulfil its Publication Obligation with due regard to Article 4(4)–(7) of REMIT, concerning the obligation to publish inside information.

The Market Participant shall publish inside information in accordance with Section 3 of the NFM Regulation.

7.2. Data protection rules

The processing of personal data by the Operator pursuant to the Publication Rules shall be governed by the provisions of Act CXII of 2011 on the right to informational self-determination and on the freedom of information and the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), in accordance with the separate data processing notice available on the Publication Website.

8. Fee payment

Market Participants shall pay an Annual Fee to the Operator in connection with the Publication Website.

The Annual Fee shall be invoiced by the 31 March of each year to the Market Participants that have a valid contract with the Operator at the time of invoicing.

For Market Participants that enter into a contract with the Operator after the Annual Fees have been invoiced, the invoice shall be issued in the calendar month following their admission, and the amount of the Annual Fee shall be prorated according to the number of months.

8.1. Procedure for calculating the fee

The Operator shall determine the amount of the Annual Fee at a reasonable and commercially justified level, in a manner that reflects the actual costs incurred in connection with the operation of the Publication Website. Such costs shall include, in particular, the costs associated with the collection, publication and transmission of inside information, ensuring the timely publication of information, and maintaining back-up and security solutions ensuring the continuity of the service.

The amount of the Annual Fee may be reviewed annually by the Operator. The Operator shall publish the applicable amount of the Annual Fee on the Publication Website no later than fifteen (15) days prior to its application and shall simultaneously notify the Authority thereof.

8.2. Payment method and deadline

The payment deadline shall be fifteen (15) days from receipt of the original invoice duly issued and delivered to the Market Participant. The payment obligation shall be deemed fulfilled on the date on which the Operator's bank credits the relevant amount to the Operator's bank account.

If the Market Participant fails to fulfil its payment obligation, the Operator may cancel the Market Participant's registration.

9. Applicable regulatory framework

REMIT and other binding European Union and Hungarian legal acts and provisions shall constitute the primary sources of the regulatory framework applicable to the Publication Rules. The provisions, guidelines and recommendations issued by ACER shall also be taken into account.

In matters not regulated by the Publication Rules, the applicable legislation and the provisions of the Electricity Supply Codes shall govern.

In addition, provisions issued by sectoral organisations or agencies governed by European Union legal acts, such as ACER, ENTSO-E, ENTSOG and CEER, shall also be taken into account.

The official language of the Publication Rules shall be English. The Publication Rules shall be prepared in both Hungarian and English. In the event of any discrepancy between the Hungarian and English language versions, the English language version shall prevail.

10. Transitional provisions

With respect to service agreements concerning the operation of the Publication Website entered into prior to the entry into force of these Publication Rules (hereinafter: Service Agreement), the terms and references contained in the previously effective Publication Rules shall be construed and applied, as appropriate, in accordance with the provisions of these Publication Rules.

Accordingly, in particular:

- where the Service Agreement contains the expression „Publication Rules approved by MEKH”, it shall be understood to mean the Publication Rules in force from time to time;
- where the Service Agreement uses the expression “Annual Contribution”, it shall be understood to mean the “Annual Fee” as defined in these Publication Rules;
- where the Service Agreement contains the expression “rates specified in Chapter VIII of the Publication Rules”, it shall be understood to mean the fees published on the Publication Website.

The above correspondences are not exhaustive. Any other terms and references contained in a Service Agreement entered into prior to the entry into force of these Publication Rules shall also be interpreted in accordance with the provisions of these Publication Rules.