

Extract of OTP Group's Sanctions Policy (Policy on compliance with sanctions provisions)

Introduction

The OTP Group applies a sanctions compliance policy aimed at ensuring compliance with the laws, regulations and embargo provisions relating to economic, financial and trade sanctions imposed by the European Union, the United Nations and the United States of America. In complying with sanctions and restrictive measures, the OTP Group takes into account local legislation and the national sanctions provisions applicable to the Group Member concerned.

Group-level Sanctions Compliance Policy

The OTP Group has a unified Sanction Compliance Policy and Sanction Procedure, which defines the minimum requirements for OTP Bank Nyrt. and its affected subsidiaries. The purpose is for the Group Members to comply with the principles of the Sanctions Compliance Policy. In doing so, they follow the standards and procedures listed below, among others:

- Screening of customers and transactions: filtering of customers and transactions to at least, but not exclusively, the list of sanctions containing persons affected by asset restriction measures of the European Union, the United Nations, the United Kingdom, and the United States of America - or, in the case of a given Group Member, the national - .
- Prohibition or restriction of business activity: prohibition or restriction of participation in the provision of business activities, financial, investment services, or products that may violate the applicable sanctions regulations. The prohibitions are also intended to prevent participation in transactions and business practices that may be aimed at directly or indirectly evading or evading applicable sanctions.

The restriction may prohibit, among other things, any business activity involving a sanctioned person or entity, or any other activity that directly or indirectly affects a country subject to comprehensive sanctions restrictions (including Cuba, Iran, North Korea and Syria, Ukraine not territories under government control: the Crimean peninsula, Donetsk, Kherson, Luhansk and Zaporizhzhya counties (taking into account, however, possible changes that may occur over time)) .



Risk appetite: OTP Bank Plc and its relevant subsidiaries may, at their sole discretion, refuse to provide any financial or investment service product or to execute any transaction where it is permitted under applicable sanctioning laws and restrictive measures, but the activity is not following the OTP Group Sanction Compliance Policy or risk appetite.

The OTP Group applies appropriate internal procedures to evaluate all affected customers and transactions, during which the processing of orders may be delayed to comply with the applicable sanctions regulations and its own Sanctions Compliance Policy.

In addition to the above, the correspondent banks involved in the transaction also have the right to suspend any transaction if it is contrary to their policy or may violate a sanction according to the indication of their filtering system. In the case of suspended transactions, OTP Bank Nyrt. and its relevant subsidiaries only mediate between the customer and the correspondent bank, they have no influence on the results of the investigations conducted by the correspondent bank.