

Compliance Policy



Annex No. 6

OTP Group Policy

Financing services related to the defense industry

Introduction

The OTP Bank Group is committed to social responsibility, and respects and supports international efforts to protect human rights and counter-proliferation as stipulated in international conventions. Accordingly, the OTP Banking Group endeavors not to engage in financing or commercial transactions involving goods that may be used in military conflicts or other violations of human rights.

Recognizing the challenges associated with the production and use of weapons, both individual states and the international community regulate the production and trade of conventional weapons and weapons of mass destruction (including so-called controversial weapons) in numerous laws and conventions.

Group Policy

Considering the above principles, the OTP Bank Group is committed to paying particular attention to financing related to arms production and trade and, among other things, applies the following strict conditions and procedures:

The OTP Banking Group is committed not to engage in trade in arms (or dual-use items for military purposes) with individuals, companies, or countries subject to international sanctions. OTP Bank Group has detailed procedures to ensure that transactions do not violate sanctions issued by the United Nations Security Council, the European Union, the competent authority of the United Kingdom, the United States of America, and applicable local regulators.

The OTP Bank group does not provide financing for so-called related to controversial weapons, including nuclear, biological, chemical weapons, blinding laser weapons, anti-personnel and undetectable mines, cluster munitions, and all other weapons prohibited by international conventions or causing unnecessary and unnecessary injury.

The customer must fully comply with binding national and international legislation and conventions on arms production and trade, as well as internationally recognized sanctions and restrictive measures, and the customer's procedures shall take into account the UN's guiding principles on business and human rights.

In the case of transactions related to the defense industry, the OTP Bank Group, following the applicable embargo regulations and mandatory national regulations, applies strict control procedures and imposes increased customer due diligence and control requirements in the case of financing contracts related to the defense industry.



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