

OTP Group Anti-Money Laundering and Counter-Terrorist Financing Policy

(Policy on Compliance with Anti-Money Laundering and Counter-Terrorist Financing Regulations)

Introduction

OTP Bank Plc. (hereinafter: the Bank or Parent Bank), as a member of the OTP Group (hereinafter: the Group) and as the Parent Bank (the Bank that directly or indirectly controls subsidiaries), and the Group (domestic and foreign financial and non-financial institutions operating under the direct or indirect control and supervision of OTP Bank Plc.) are committed to complying with domestic and international regulations aimed at preventing money laundering and terrorist financing (hereinafter: AML/CFT), and take into account recommendations and guidelines issued in this regard.

To ensure compliance with AML/CFT requirements, the Group develops internal regulations, as well as effective processes, procedures, and embedded controls.

In its AML/CFT activities, the Group applies a risk-based approach, giving priority to higher money laundering or terrorist financing (ML/TF) risks.

Group-Level Policy and Procedures

The Parent Bank defines the group-wide requirements, procedures, and workflows related to AML/CFT activities. The Parent Bank operates a control mechanism to monitor the effective implementation of group-wide expectations by Group members.

Internal Risk Assessment

To identify, analyse, assess, and manage ML/TF risks, the Group prepares a group-wide risk assessment, the results of which are regularly reviewed. Within the framework of the group-wide risk assessment, the Parent Bank defines and implements risk management measures to address residual risks identified.

Customer Due Diligence

The Group categorises its clients into risk categories and applies customer due diligence measures of varying depth depending on the risk level. Customer due diligence involves identifying, verifying, and recording the data of clients, related persons, and beneficial owners. The Group also takes measures to keep customer data up to date. The Group continuously monitors the business relationship with the client and performs dynamic due diligence if the client's risk rating changes.

The Group reserves the right to refuse to establish a business relationship or execute any transaction if there is a suspicion of money laundering or terrorist financing, particularly if the client cannot or will not provide satisfactory information on the background of a suspicious transaction.



During customer due diligence, the Group applies the 'Know Your Customer' (KYC) principle to create a customer profile for the client.

Transaction Screening

The Group uses an automated filtering system to screen transactions that do not fit the customer profile and are suspicious from a money laundering or terrorist financing perspective. Special attention is paid to all complex, unusual transactions and financial operations without economic or lawful purpose.

The Group fulfils its reporting obligations as defined by law.

Training

To increase employee awareness of AML/CFT, the Group holds regular (at least annual) mandatory training sessions. Training materials are reviewed regularly.

Cooperation with Authorities

The Group fully cooperates with national supervisory and investigative authorities, as well as local financial intelligence units, and provides the requested information within deadlines when contacted. It fulfils its reporting and data provision obligations in accordance with applicable regulations.

