

## OTP Group Policy

### Financing Services Related to the Defence Industry

#### Introduction

The OTP Bank Group is committed to social responsibility and respects and supports the protection of human rights as enshrined in international agreements, as well as international efforts against proliferation. Accordingly, the OTP Bank Group strives not to participate in financing or commercial transactions for goods that may be used in military conflicts or other violations of human rights.

Recognising the challenges associated with the production and use of weapons, both individual states and the international community regulate, through numerous laws and agreements, the production and trade of conventional weapons, as well as weapons of mass destruction (including so-called controversial weapons).

#### Group-Level Policy

The OTP Bank Group – in consideration of the above principles – is committed to exercising special care in financing activities related to arms manufacturing and trade, and applies, among others, the following strict conditions and procedures:

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

Az OTP Bankcsoport nem nyújt finanszírozást ún. ellentmondásos fegyverekhez kapcsolódóan, ideértve a nukleáris-, biológiai-, vegyi fegyvert, vakságot okozó lézer fegyvert, személy elleni és nem észlelhető részeket tartalmazó aknát, kazettás lőszert, valamint minden más nemzetközi egyezményekben tiltott, vagy sürgősségtelen és aránytalan sérülést okozó fegyvert.

Clients must fully comply with binding national and international laws and agreements on arms manufacturing and trade, as well as internationally recognised sanctions and restrictive measures, and in their procedures must take into account the UN Guiding Principles on Business and Human Rights.

In the case of transactions related to the defence industry, the OTP Bank Group, in line with applicable embargo regulations and binding national requirements, applies strict control procedures and imposes enhanced customer due diligence and monitoring requirements when financing contracts related to the defence industry.