

Compliance Policy – Annex 5/B
Excerpt from the OTP Group 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 and applicable by the European Union, the United Nations, and the Government of the United States of America. In complying with sanctions and restrictive measures, the OTP Group also takes into account local laws and the national sanctions provisions applicable to the relevant Group member.

Group-level Sanctions Compliance Policy

The OTP Group has a unified Sanctions Compliance Policy and sanctions procedure framework, which sets out the minimum requirements for OTP Bank Plc. and its relevant subsidiaries. The aim is for Group members to meet their obligations and the principles set out in the Sanctions Compliance Policy. In doing so, they follow, among others, the standards and procedures listed below:

- Customer and transaction screening: Customers and transactions must be screened, at least but not exclusively, against sanctions lists containing persons subject to asset-freezing measures by the European Union, the United Nations, the United Kingdom, the United States of America, and, for the given Group member, the relevant national authorities.
- Prohibition or restriction of business activities: Prohibition or restriction on engaging in business activities, providing financial or investment services, or products that may violate applicable sanctions provisions. These prohibitions also aim to prevent participation in transactions and business conduct intended to circumvent or evade applicable sanctions, directly or indirectly.

The restrictions may prohibit – among others – any business activity involving a sanctioned person or entity, or any other activity directly or indirectly affecting a country subject to comprehensive sanctions (including Cuba, Iran, North Korea, Syria, and the non-government-controlled areas of Ukraine: the Crimean Peninsula, Donetsk, Kherson, Luhansk, and Zaporizhzhia regions, while taking into account any potential changes over time).



- Risk appetite: OTP Bank Plc. and its relevant subsidiaries may, at their discretion, refuse to provide any financial or investment service or execute any transaction where, although permitted under applicable sanctions laws and restrictive measures, the activity is not consistent with the OTP Group Sanctions Compliance Policy or its risk appetite.
- The OTP Group applies appropriate internal procedures to assess all relevant customers and transactions, during which, to ensure compliance with applicable sanctions provisions and its own Sanctions Compliance Policy, the processing of orders may be delayed.

In addition, correspondent banks involved in the transaction are entitled to suspend any transaction if it is contrary to their own policy or if their screening system indicates a possible sanctions violation. In the case of suspended transactions, OTP Bank Plc. and its relevant subsidiaries act solely as intermediaries between the client and the correspondent bank, without any influence over the outcome of the correspondent bank's investigation.

A fentieken túl az ügyletben közreműködő levelezőbankoknak is joguk van arra, hogy bármely tranzakciót felfüggeszsenek, amennyiben az ellentétes a saját politikájukkal, vagy a szűrőrendszerük jelzése szerint szankciót sérthet. Felfüggesztett tranzakciók esetében az OTP Bank Nyrt. és érintett leányvállalatai kizárólag közvetítenek az ügyfél és a levelezőbank között, befolyásuk a levelezőbank által lefolytatott vizsgálatok eredményére nincsen.