

## Social Media Policy – Excerpt

### 1. Purpose and Scope

OTP Bank Plc. (hereinafter: the Bank) supports the organisations, managers, and employees of the OTP Group in actively using social media to strengthen the Bank's local, national, and international reputation, as well as to maintain contact with current and future customers, employees, and other key stakeholders. Social media is a collective term for websites, web pages, and applications focused on communication, social interaction, content sharing, and collaboration.

The purpose of this Social Media Policy (hereinafter: the Policy) is to provide guidance to employees on the professional and private use of social networking sites, thereby protecting the reputation of the employee, PortfoLion Venture Capital Fund Management Ltd. (hereinafter: the Company), and the OTP brand.

The rules of conduct for social media apply to communication on both personal and professional topics. The Policy provides guidance on the interpretation and practical application of the principles set out in the Company's Code of Ethics.

### 2. Guidance for Employees on the Use of Social Media

#### 2.1. Separation of Personal and Professional Opinions

Employees may, at their discretion, indicate their workplace and occupation in their social media profile. The Company expects employees to ensure that such information is always accurate and up to date. If the Company is indicated in an employee's personal profile, extra care must be taken with content: the employee's private opinion, posts, and comments may affect the Company's reputation.

The Company expects its employees to use the first person singular when commenting on social media, thereby indicating that they are expressing their personal opinion. For posts relating to the Company, it is recommended to insert in the personal profile, in a clearly visible manner, the following or a similar statement: "The posts published on [xy blog/channel] contain my personal opinion and do not reflect the position of the Company."

#### 2.2. Be Open, Polite, and Build Good Professional Relationships

The Company recommends that employees consider the following aspects when making professional posts, content, and comments on social media:

- Stick to your area of expertise; write only about what you know.
- Cite your sources and verify information before publication.

- • Be honest; never make misleading or false statements about your activities or achievements at the Company.
- • Correct errors immediately and make corrections clear.
- • Be polite and treat former and current colleagues, your employer, the Company's partners, and competitors with respect.

For news or content relating to the Company, employees are expected not to disclose confidential business information before official or senior management communication.

When sharing another employee's post, particular care must be taken to respect intellectual property rights and cite the source accurately.

## 2.3. Act Responsibly – Follow the Code of Ethics

Employees must refrain from any expression in social media that could adversely affect the Company's good reputation. Employees are expected to behave in a manner consistent with the Company's ethical standards, even when communicating as private individuals, especially if their activity or identity can be associated with the Company or give the impression that they are acting or speaking on behalf of it.

Accordingly, in social media activities, the Company draws employees' attention to the following expectations from the Code of Ethics:

- • Respect others' religious, national, ethnic, sexual, political, and ideological affiliation.
- • Refrain from racist, hateful expressions or content sharing, and from publishing materials that are unlawful or encourage unlawful activity. In particular, avoid actions under the scope of criminal law: incitement against a community, denial of the crimes of National Socialist or Communist regimes, desecration of national symbols, use of totalitarian symbols, incitement against official orders, spreading false information, or threats to public safety.
- • Avoid vulgar, obscene, defamatory, or offensive expressions and do not publish false audio or visual recordings that could damage another's honour. Avoid offensive or personal remarks, and be aware that what is acceptable or humorous in one setting may be offensive in another.
- • Refrain from using the Company's name to promote or endorse any product, cause, religious view, political party, candidate, etc.

## 2.4. Protect the Company's Confidential Information and Reputation

Employees must always keep the Company's business interests and good reputation in mind. Accordingly, they must not disclose, in either professional or personal communication, the following:

- • Business secrets, know-how (economic activity-related, confidential – not public or easily accessible – facts, information, other data, and compilations thereof that have economic value and whose confidentiality is a fundamental interest of the Company), in particular:
  - ○ Non-public financial or operational information relating to the Company's performance, revenue, or business policy, or any information that may influence the Company's operations,



- o Information on contracts and suppliers,
  - o Strategic plans, acquisitions, products or services to be introduced in the future,
  - o Legal matters, litigation, or comments on any party with which the Company may be in litigation,
  - o Information relating to crisis situations;
- • Copyright- or intellectual property-infringing content used without permission;
- • Personal data or privacy-infringing content (confidential, protected, or sensitive information about the Company, its customers, current or former employees, or executives).

## 2.5. When in Doubt, Ask

All posts and content published on social media can be retrieved, shared, or preserved in screenshot or other form, regardless of the privacy settings of the profile owner.

To protect its reputation and business interests, the Company may monitor social media content and information published by its employees.

Accordingly, the Company advises employees to publish social media content or opinions related to the Company only if they are completely certain that it complies with this Policy and the Code of Ethics.

The Company provides continuous assistance and support to employees for reviewing social media content, as well as for handling sensitive issues or negative comments that may arise when using social media.

The Company's Compliance Officer receives reports if an employee notices conduct or content on social media that violates this Policy or the Code of Ethics. The Company investigates all reports and concerns regarding social media content.

Violation of the Code of Ethics in the use of social media may result in labour law and criminal consequences. Any content on social media that endangers the Company's good reputation, the security of its business operations, breaches ethical principles, is unlawful, or violates the Company's rules, policies, or regulations may result in disciplinary action, including termination of employment.

