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Resolution number: H-JÉ-I-B-307/2019.

Based on the conclusion of the audit procedure against OTP Bank Plc. (registered office: 1051 Budapest, Nádor utca 16.)(“the Bank”) by the National Bank of Hungary (registered office: 1054 Budapest, Szabadság tér 9. (“MNB”), the MNB passes the following

R e s o l u t i o n

- I. 1.1. The MNB accepts the Bank's request (Request) submitted on 22 October 2019. The Request was for an extension of certain settlement deadlines required by the MNB's decision (Decision) of 5 March 2019 (resolution number: H-JÉ-I-B-68/2019.), 1.2.7 of the operative part of the Decision; of the Decision under [Bank.FED.1]. The MNB shall extend the deadline for fulfillment of the obligation specified in the Decision until 31 March 2020.

1.2. The MNB sets the deadline for the fulfillment of the extraordinary reporting obligation on 29 May 2020 (referring to 1.2.7 point of the Decision).
- II. The MNB rejects the Bank's Application in the following section: extension of the deadline for fulfillment of the obligation until 31 December 2019 (referring to 1.4.1. and 1.4.6. points of the Decision).
- III. The MNB repeatedly obliges the Bank to fully comply with the obligations set out in the MNB's resolution at all times.
- IV. In the field of information technology and information security, in accordance with point 1.4.1. and 1.4.6. by 31 December 2019 at the latest and thereafter continuously ensure:

4.1. in accordance with the law and its internal regulations, conduct an IT security risk analysis, prepare an action plan for managing non-committed risks, including a responsible and performance deadlines, and implement it in a proportionate manner in time;

4.2. ensure that the general information security sealing requirements are met by administrative, physical and logical measures as well as by updating the internal regulations at all times.
- V. MNB requires the Bank to report on (as extraordinary data supply) the measures taken by 29 February 2020 in a documented manner in order to verify the full compliance with the obligations contained with exception in point III-IV.
- VI. The MNB obliges the Bank to pay fine in the amount of 10.000.000,- HUF due to violation of law indicated in point 4.1-4.2.
- VII. This Decision is without prejudice to the other provisions and deadlines of the operative part of the Decision, which remain in force.

The MNB draws the Bank's attention to the fact that, if the present commitments are not or not fully complied with, the MNB will have the possibility to apply additional measures provided by law.

No procedural costs were incurred during the procedure.

The imposed fine has to be paid to the account number 19017004-01678000- 30900002 of the MNB within 30 days after this resolution becoming enforceable by indicating „supervisory fine” as a comment and the number of the resolution. In event the deadline for the payment of the supervisory fine is missed, default interest will be charged, the extent of which will be calculated at the rate of 365th of the double of the central bank rate in effect on the date of imposition after every calendar day following the date of imposition. No further payment

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of default interest is allowed to be charged due to the late payment. The default interest has to be paid to the cited account of the MNB by indicating the number of the resolution and the comment „default interest”. The due fine finally imposed by the MNB, and the default interest charged because of the due fine or late payment of the fine will be collected in way of tax by the state tax authority.

No appeal can be made against the resolution via administrative proceeding. The Client and, with respect to provisions concerning the other participant, that other participant of the proceeding related to primarily the respective provision should submit the resolution for review within 30 days from the publication of the decision citing violation of law by the Metropolitan Court of Administration and Labour.

The client represented by legal representative and the business entity with Hungarian registered office shall submit the statement of claim to the MNB through the assistance service of form's submission (webpage of the assistance service of form's submission: <https://www.mnb.hu/felugyelet/engedelyezes-es-intezmenyfelugyeles/hatarozatok-es-vegzesek-keresese>).

The lodging of an application has no suspensive effect on the entry into force of the decision, but the plaintiff may apply for immediate legal protection.

Budapest, 20th December, 2019.