



Green Strategy 2026



Introduction

Climate change is one of the most pressing challenges of our times: the climate is changing at an unprecedented pace, already manifesting in extreme weather events, heatwaves, droughts, and floods. If this process is not mitigated, the consequences will become even more severe, fundamentally transforming our daily lives. Human activity – particularly the emission of greenhouse gases – plays a key role in this change: the rising average temperature is largely driven by the increasing concentration of greenhouse gases in the atmosphere, especially carbon dioxide emissions.

Experts agree that decisive action can slow this process. Key measures include replacing fossil energy sources (coal, oil, natural gas) with renewable energy, improving energy efficiency, supporting sustainable transportation, and afforestation are essential steps to mitigate climate change.

The role of credit institutions in combating climate change

The integration of the financial system with sustainability considerations has become a strategic priority. Failure to achieve the green transition not only jeopardizes climate goals but also threatens the long-term stability and resilience of the financial system.

Credit institutions may play a key role in the transition to a low-carbon, climate-resilient economy. As a key player in the Hungarian mortgage credit market, OTP Mortgage Bank Ltd. (hereinafter: OTP Mortgage Bank or Company) recognised the threats posed by climate change and the overexploitation of natural resources, which endanger the planet's ecosystem, as well as the health and well-being of society.

OTP Group first developed its ESG Strategy¹ in 2021 and regularly updates it in line with regulatory requirements and investor expectations. The core of the Strategy is financing the transition to

low-carbon economies, increasing the green loan portfolio, and achieving carbon-neutral operations – thus gradually building a sustainable future.

As a member of the OTP Group, OTP Mortgage Bank is committed to leveraging its resources to contribute to the achievement of environmental and climate objectives and actively support the energy renewal of Hungary's residential building stock. To support this ambition, the Company first developed its Green Strategy and Green Covered Bond Framework in 2021 (hereinafter the Strategy and the Framework), which included all the principles and objectives that enable the Company to act effectively and proactively for environmental protection.

The Company aims to support international and domestic efforts to promote sustainable development within the scope of its capabilities; in particular, but not limited to:

- **the Paris Agreement² aimed at facilitating efforts to limit the increase in the global average temperature and adapt to climate change;**
- **the European Green Deal initiative³ of the European Union, which set out, among other things, the objective of achieving climate neutrality across the EU by 2050;**
- **the New European Bauhaus initiative⁴ of the European Union, one of its strategic objectives is to place the renewal of the residential building stock on a revised policy basis;**
- **the European Union's directive adopted in 2024 aimed at improving the energy performance of buildings (EPBD)⁵;**
- **the Energy efficient Mortgages Action Plan (EeMAP)⁶ initiative promoting energy-efficient mortgage lending;**

1 OTP Bank Sustainability

2 Paris Agreement

3 The European Green Deal

4 New European Bauhaus

5 Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings

6 Energy efficient Mortgages Action Plan

- The National Energy Strategy⁷ and the National Energy and Climate Plan⁸ of the Government of Hungary;
- the Green Programme⁹ of the Central Bank of Hungary, which offers important incentives for the green operation of the financial intermediary system;
- the recommendations laid down in Recommendation No. 5/2021 (IV. 15.) of the Central Bank of Hungary¹⁰ in relation to tackling climate and environmental-related risks and the enforcement of environmental sustainability criteria; and
- the expectations set out in Recommendation No. 10/2022 (VIII.2.) of the Central Bank of Hungary¹¹ titled "On Climate-Related and Environmental Risks and the Enforcement of Environmental Sustainability Considerations in the Activities of Credit Institutions";
- the guidelines¹² formulated by the Central Bank of Hungary, regarding the definition of green residential properties built before 31 December 2020;
- the expectations outlined in the joint publication of the Central Bank of Hungary and the Hungarian Banking Association¹³: "Joint Position – Recommendations and Guidelines on Green Covered Bond Impact Reports";
- the recommendations included in the ESG Reporting Guide¹⁴ of the Budapest Stock Exchange, promoting the proliferation and transparency of green investments.

The role of energy-efficient building stock in combating climate change

In the preamble of its 2010 Directive on the energy performance of buildings¹⁵, which was updated in 2024, the European Union pointed out that one of the reasons for developing the legislation was the fact that buildings account for 40% of total energy consumption in the Union. In its building renovation strategy¹⁶ published in 2020, the European Commission cited similar data: overall, buildings are responsible for about 40% of the EU's total energy consumption, and for 36% of its greenhouse gas emissions. This is not surprising: the building stock is old (85% of the EU's building stock was built before 2001) and outdated; the buildings fail to meet modern energy efficiency requirements. At present, outdated buildings consist of two thirds of the building stock, while only 1% of the buildings undergo energy renovation, which is far from being sufficient to achieve the stock renewal required to meet climate targets. As stated in the document: "it is therefore urgent for the EU to focus on how to make our buildings more energy-efficient, less carbon-intensive over their full life cycle and more sustainable". Upgrading the building stock may contribute significantly to the success of the initiatives against climate change.



7 National Energy Strategy 2030
 8 National Energy and Climate Plan
 9 MNB Green Programme
 10 Recommendation No. 5/2021 (IV. 15.) of the Central Bank of Hungary
 11 Recommendation No.10/2022. (VIII.2.) of the Central Bank of Hungary
 12 Central Bank of Hungary – Management circular on the definition of green residential properties built before 31 December 2020
 13 Central Bank of Hungary – Hungarian Banking Association: Joint Position – Proposals and Guidelines Regarding Green Covered Bond Impact Reports
 14 ESG Reporting Guide for Issuers of the Budapest Stock Exchange
 15 Directive (EU) 2024/1275 of the European Parliament and of the Council on the energy performance of buildings
 16 A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives

Energy characteristics of the Hungarian building stock

For geographical and historic reasons, the energy-efficiency indicators of Hungarian residential buildings are also unfavourable¹⁷. Hungary's stock of residential buildings is aged and obsolete from an energy perspective. Since almost 80% of residential buildings were built before 1990, an enormous part of the stock needs to be renovated. Due to the poor energy efficiency of old buildings, the energy consumption of buildings built before 1959 is more than triple, and their heating energy requirement is more than quadruple the consumption of new buildings. Buildings built in 1976–1989 have better indicators, but their energy consumption is still more than double, and their heating energy requirement is more than two and a half times that of new homes¹⁸.

All this is confirmed by the statistics gathered with respect to the energy performance certificates of residential buildings. In Hungary, since 2012 it has been mandatory to have an energy performance certificate before putting into use, selling or leasing properties, providing detailed information on the energy consumption of the building. In 2016, a stricter energy performance rating scale was introduced (TNM Decree¹⁹), followed by a change in 2023 to the system of criteria defining the energy classification of buildings (ÉKM Decree²⁰), replacing the two-letter rating scale with a single-letter scale with stricter requirements and threshold values. Based on model calculations of the energy demand of the domestic housing stock derived from certificates issued between 2016 and 2023 and published by the Central Statistical Office (KSH)²¹, under the classification valid until 2023, 9.4% of houses fell into the best categories (AA–CC), while 15.3% were in the most wasteful categories (II–JJ). Under the new classification system, slightly more residences fall into the extreme categories: 8.1% in classes A–C, and 28% in class I.

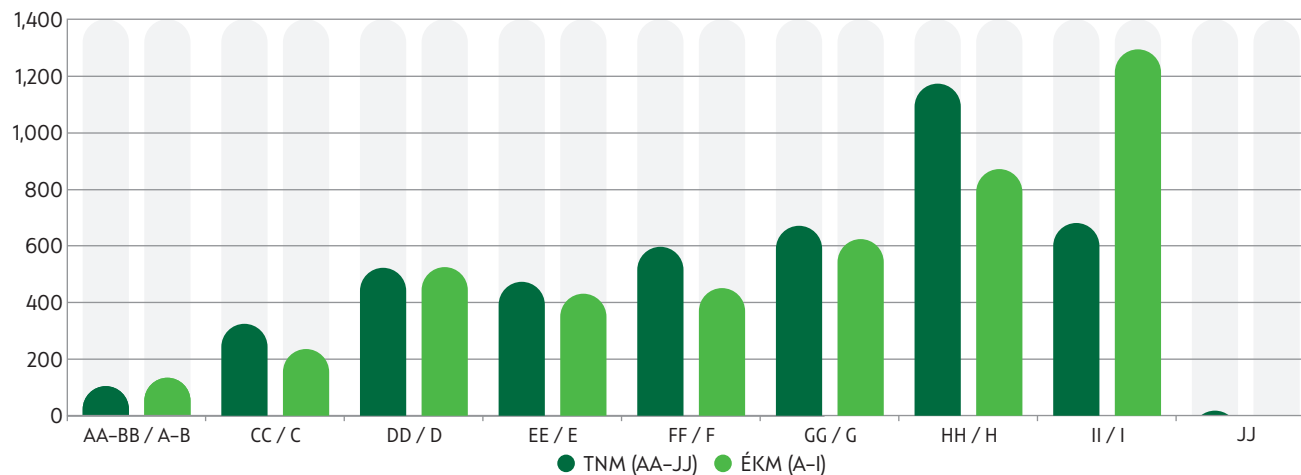
Introducing the ESG Approach

Climate change is not only an environmental challenge but also an economic and social risk that fundamentally impacts corporate operations and sustainability strategies. ESG principles play a decisive role in this context: integrating Environmental (E), Social (S), and Governance (G) considerations is not merely a matter of regulatory compliance but a source of long-term value creation and competitive advantage. Investors, consumers, and regulators increasingly expect transparent, ethical, and sustainable operations.

With these factors in mind, OTP Mortgage Bank decided in 2026 to update its Green Strategy in line with legal and market requirements and prepared the updated document by integrating ESG principles.

The Green Strategy of OTP Mortgage Bank was approved by the Company's Board of Directors on 20th March 2026.

Distribution of the housing stock by energy performance classes 2016-2022²¹



17 EU Buildings Factsheets
 18 Hungarian Central Statistical Office
 19 Decree 7/2006 (V.24.) TNM on the determination of the energy performance of buildings
 20 Decree 9/2023. (V. 25.) ÉKM on the determination of the energy performance of buildings
 21 Hungarian Central Statistical Office: Estimating the primary energy demand of the Hungarian housing stock

Introduction of the Company

OTP Group

Owing to its international expansion strategy started in the early 2000s, OTP Group has become a dominant regional player in the Central and Eastern European market. It is one of the largest financial service provider groups in the region, with a presence in numerous countries in addition to Hungary.

OTP Mortgage Bank

OTP Mortgage Bank is the largest participant in the Hungarian mortgage lending market: it is market leader both in terms of outstanding mortgage bonds and the size of its mortgage loan portfolio. The product range of the Company features housing loans and construction loans as well as loans for renovation purposes, including market and state-subsidised versions. In 2025, nearly a third of the retail mortgage loans disbursed in Hungary were granted by OTP Mortgage Bank. As a specialised credit institution, the Company's business activity is limited to providing housing and general-purpose mortgage loans to the retail segment and to refinancing the mortgage loan portfolio of commercial banks; in light of statutory constraints and the business model of OTP Group, the Company pursues no other commercial banking activities.



ESG Strategy

ESG stands for Environmental (E), Social (S), and Governance (G), a framework developed to assess companies' sustainability and responsible operations alongside financial performance. OTP Group first created its ESG Strategy in 2021, the foundations were set out in the document of OTP Bank's ESG Approach²², and regularly updates it in line with regulatory requirements and investor expectations. The focus is on the transition to low-carbon economies, increasing the green loan portfolio and achieving carbon-neutral operations – thus gradually building a sustainable future. The ESG Strategy of OTP Mortgage Bank is aligned with the corresponding initiatives of OTP Group.

Thanks to its commitment to sustainable development, the Group was the first to receive the Green Finance Award established by the National Bank of Hungary in 2019, and in the following years it earned numerous prestigious international recognitions, including the Global Finance magazine's sustainability award in the past two years, ahead of several large multinational banks.

OTP Group has set its 2030 targets for the carbon intensity of its financed portfolio based on the principles of the EU Taxonomy and the Net-Zero Banking Alliance. The goal is to align portfolio emissions with the 1.5°C warming target, which requires scientifically grounded, sector-specific decarbonization pathways. Compared to the 2023 baseline year, OTP Group has committed to a significant reduction in the carbon intensity of its financed emissions (e.g., tons of CO₂e per million HUF of the loan portfolio) by 2030. In 2025, the Group achieved a green loan portfolio exceeding HUF 1,500 billion, which it plans to further increase by 2030.

The commitment of OTP Mortgage Bank to green objectives is also reflected in the Company's internal operations. The enforcement of sustainability considerations and the execution of related tasks within OTP Mortgage Bank are coordinated by the ESG department appointed by the CEO, in line with the guidance of the Green Program Directorate. Its responsibilities include supporting the development and regular review of the Green Strategy, contributing to the implementation of the goals and principles defined in the Strategy across all areas of the Company's operations, and preparing regular and comprehensive reports for the Management Board and the Supervisory Board of OTP Mortgage Bank on the achievement of green objectives, thereby supporting the decision-making process of these governing bodies.

It is particularly important for the Company to set real and feasible goals. OTP Mortgage Bank identified the following areas through which it can contribute to sustainable development:

Within the scope of business activities:

- green lending;
- green mortgage bond issuance.

With respect to own operations:

- green operations;
- corporate governance guidelines; and
- corporate social responsibility.



I. Goal: increasing green assets and resources

A) Green lending in focus: energy efficiency and the renewal of the building stock

Due to the regulatory framework set by the Hungarian Mortgage Bank Act²³, the asset-side business activity of OTP Mortgage Bank consists of lending secured by real estate collateral and other related supplementary activities. Consequently, OTP Mortgage Bank can primarily support sustainable development through green lending by striving to link its lending activity as much as possible to real estate purposes that promote sustainability, in particular the purchase of energy efficient properties and the energy efficiency refurbishment of buildings. Such loans are referred to as "green loans."

The Company has developed its definition for identifying properties that support sustainability purposes based on the recommendations of international organisations, primarily, the Green Bond Principles²⁴ issued by the International Capital Market Association. The Company has established the criteria for green mortgage loans in alignment with the technical screening criteria applicable to making substantial contribution²⁵ to climate change mitigation, as defined in the EU Taxonomy²⁶ Regulation's delegated act on climate-related taxonomy²⁷ (hereinafter EU Taxonomy). These guidelines classify financed properties primarily based on their energy performance. Accordingly, OTP Mortgage Bank accepts as green mortgage loans those retail mortgage loans for which the property(ies) serving as the purpose of the loan meet the following energy-performance requirements defined under the Substantial Contribution criterion of the EU Taxonomy activity applicable to lending.

For construction (EU Taxonomy Annex I, 7.1) and purchase (EU Taxonomy Annex I, 7.7) purposes – highly energy-efficient properties:

- For properties built before 31 December 2020, only those within the top 15% of the national building stock in terms of operational primary energy demand are considered eligible.
- For properties built after 31 December 2020, the primary energy demand of the resulting building must be at least 10% lower than the threshold defined for nearly zero-energy buildings under national measures implementing Directive 2010/31/EU of the European Parliament and of the Council.

For renovation purposes (EU Taxonomy Annex I, 7.2) – significantly improving properties:

- The building renovation must comply with the requirements for major renovations or result in at least a 30% reduction in primary energy demand²⁸.

The strategic goal of OTP Mortgage Bank is to continuously increase the share of the above mentioned green loans within its new disbursements, in line with OTP's ESG strategy. The Company continuously reviews the definition of green loans in accordance with Hungarian and international regulatory trends and tightens the criteria as necessary.



23 Act XXX of 1997 on Mortgage Banks and Mortgage Bonds

24 ICMA Green Bond Principles – June 2025 Update

25 Commission Delegated Regulation (EU) 2021/2139 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to other environmental objectives.

26 Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

27 Commission Delegated Regulation (EU) 2021/2139 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation, and for determining whether that economic activity causes no significant harm to other environmental objectives.

28 The initial primary energy demand and its estimated improvement are based on a detailed building survey, an energy audit carried out by an accredited independent expert, or any other transparent and proportionate method, and are validated by an energy performance certificate. The 30% improvement results from the actual reduction in primary energy demand (excluding any reduction in net primary energy demand achieved through renewable energy sources) and can be achieved through measures implemented consecutively within a maximum of three years.

B) Issuance of green mortgage Bonds: serving the demand for sustainable investments

Efforts to combat climate change and increasing environmental pressure are becoming strategic considerations within the community of investors, while investor demand for instruments that finance green objectives is growing. OTP Mortgage Bank can contribute to this by transforming its funding strategy and expanding its mortgage bond issuance programme in a targeted manner. The Company's goal is to continuously issue green mortgage bonds starting from 2021 – and, as far as its loan portfolio allows – to gradually increase the proportion of green mortgage bonds.

OTP Mortgage Bank also formulated the definition of green mortgage bonds in accordance with the principles and requirements included in the guidelines issued by international and domestic organisations. The principles contain four core components:

- **Use of Proceeds;**
- **Process for Project Evaluation and Selection;**
- **Management of Proceeds;**
- **Reporting.**

Prior to the issuance of a green bond, in the context of its green mortgage bond framework, OTP Mortgage Bank publishes its commitment to issue the bonds concerned or to issue bonds under a given programme in accordance with the above principles. In line with investor requirements and regulatory guidelines, the Company updated its Framework in 2026.



OTP Mortgage Bank will consider any mortgage as bonds green mortgage bonds if their proceeds are used to finance the green loans defined above. The Company ensures that the proceeds from green mortgage bonds are allocated to green projects in two different ways:

- **by using the proceeds to finance already existing, disbursed green loans (which may include mortgage loans held in the Company's own portfolio as well as refinanced mortgage loans in the portfolios of its commercial banking partners); or**
- **by combining the issuance with a commitment declaring that after issuance, the proceeds from the green mortgage bonds will be disbursed as green loans as soon as possible in accordance with the applicable international and Hungarian standards and regulations.**

Principal amounts received from contractual or extraordinary repayments (prepayments or early repayments) of green loans will be allocated by OTP Mortgage Bank to new green projects if it is necessary to ensure consistency between the issued green mortgage bonds and the green loan portfolio recorded on its balance sheet.

The Company allocates the liquidity temporarily available from green mortgage bonds issued together with a commitment or from the principal repayments to the financing of Hungarian government securities, Hungarian green government securities, green bonds, or other instruments defined in the relevant international and Hungarian standards and regulations.

After issuance and during the term of the bonds, OTP Mortgage Bank publishes annually the most important information on the green mortgage bonds in circulation, the use of proceeds and the portfolio of green mortgage loans. In line with international framework guidelines, the Company ensures that this report is verified by a third party prior to each annual publication.

II. ESG focused business operations

A) Environmental considerations in our own operations

Although OTP Mortgage Bank is a small-sized organisation in terms of its number of employees (the average headcount has not exceeded 50 in recent years), within its own means limits, it strives to organise its internal operation in the most sustainable manner possible in accordance with the relevant initiatives of OTP Group. The Group's environmental activities in relation to operations cover the following areas.

The Group uses state-of-the-art technologies in new construction and renovation projects, installing modern engineering solutions and energy-efficient LED light technology. Since 2019, solar panels and heat pumps have been installed during the renovation of units in the branch network. The share of renewable energy sources in operations is continuously being expanded, taking economic considerations into account. By the end of 2022, OTP Bank achieved net carbon neutrality in its own operations, primarily through the purchase of carbon credits and the implementation of energy efficiency measures.

As the operation of the branch network involves significant travel and transportation, in addition to the established practices of route optimization and the use of video conferencing, vehicle acquisitions prioritize lower fuel consumption: since 2019, OTP Bank's vehicle policy has included hybrid cars in every category, and from the same year, the group-wide maximum carbon dioxide emission limit has applied.

For the OTP Group, digitalisation not only serves to improve customer experience but also plays a key role in reducing environmental impact. Reducing paper usage and supporting customers in making sustainable decisions are integral parts of the



strategy. The option of electronic statements instead of paper-based bank statements significantly contributes to reducing paper consumption. The CO₂ calculator available in the Mobil Bank application is an innovative tool that helps customers measure the carbon footprint of their transactions. This feature encourages responsible financial decisions and contributes to the development of sustainable consumer behavior. In addition to reducing paper usage and generated waste, recycling is also made available at the operating units. It is common practice within the Group to donate obsolete but still functional furniture and IT equipment to institutions in need or to charitable organisations.

Due to its size, OTP Group is a major purchaser, and its decisions on purchases and suppliers affect the local economy, including its business culture and development. Group-level strategic objective²⁹ is to standardise and centralise procurement for the benefit of interchangeability and cost-effectiveness. When selecting our suppliers, we ensure fair market practices and equal opportunity. The Group seeks to establish long-term relations and strategic partnerships to guarantee service quality. In our procurement operations, we consider the quality and life-cycle costs of products and services, with special focus on long-term usability and reparability.

B) Implementation of Corporate Governance Principles

The creation and implementation of an ESG-oriented governance structure has been a priority both at group level and company level in recent years. After OTP Group established the ESG Steering Committee and the Operational Board, as well as the Green Program Directorate to coordinate the achievement of sustainability goals, OTP Mortgage Bank also set up its own dedicated ESG department in 2024.

OTP Bank is an official signatory to the UN Principles for Responsible Banking, an internationally recognized framework for sustainable banking developed through a partnership between the world's banks and the United Nations Environment Programme Finance Initiative (UNEP FI).

Transparency is fundamental for the Group; therefore, the Bank publishes its Group-level Integrated Annual Report each year, which includes OTP Group's Sustainability Report³⁰. The 2024 Sustainability Report was prepared in accordance with the CSRD and the European Sustainability Reporting Standards (ESRS³¹). OTP Group's ESG performance is assessed by several international organizations (e.g., Sustainalytics, MSCI ESG, CDP). In 2025, OTP Bank's Sustainability ESG Risk Score was 17.4, indicating a low-risk category, and its MSCI ESG rating was "A".

OTP Group's Code of Ethics³², in order to protect the Group's values, sets clear guidelines and expectations for ethical business conduct for OTP Bank, the entire OTP Group, and those associated with the Group. OTP Bank adopted its Group-level Code of Ethics in 2006, which has been continuously updated and developed to reflect external and internal changes and expectations. OTP Group places great importance on raising awareness and understanding of ethical standards and the ethics reporting system among employees; therefore, it provides ethics training for all employees and regularly reviews and monitors compliance with ethical standards.

The Banking Group is committed to fighting corruption and has declared³³ zero tolerance for all forms of bribery and undue advantages. The Group acts consistently and firmly against corruption, aiming to ensure full compliance with national, EU and international anti-corruption regulations, and expects adherence from its employees and contractual partners.

As a responsible employer and a member of OTP Group, the Company pays special attention to the professional training and development of our employees; in addition, a wide range of employee welfare programs are available. As a family-friendly



workplace, we strive to maintain work-life balance, providing private health insurance and support for pension savings. We believe that a healthy lifestyle and employee well-being contributes to effective work performance and strengthen workplace communities.

C) Corporate social responsibility

Employees of the Mortgage Bank are committed to social responsibility and pay special attention to supporting disadvantaged groups. As part of this, they regularly organise volunteer programmes aimed at helping children in state care and promoting social inclusion. These activities form an integral part of the Company's values and contribute to strengthening community well-being.

OTP Group is committed to promoting financial education, both by enhancing clients' financial literacy and by familiarising them with banking operations, services and products. In this spirit, employees of the Mortgage Bank have volunteered to join financial education programs initiated by OTP, such as the project called Money Week (Pénz7).

In 2024, OTP Group took significant steps to reduce and prevent banking fraud. The Cyber Defence Center of OTP Bank removed several thousand phishing sites and misleading advertisements, primarily from social media platforms.

Together with OTP Bank, OTP Mortgage Bank also joined the Hungarian Banking Association's 'Good Bank – Green Heart' program, which aims to raise awareness of human and natural values. During 2025 – 2026, the banking sector set the goal of planting 5 hectares of new forest. Volunteers planted 50,000 tree saplings near Szakály and Miszla, on the land managed by Gyulaj Forestry and Hunting Zrt.

Further information on OTP Group's environmental, social and governance commitments is available on the website of OTP's ESG Programme³⁴ and in its annually published Sustainability Report³⁵.

30 OTP Bank Sustainability Reports

31 Directive (EU) 2022/2464 of the European Parliament and of the Council amending Regulation (EU) No 537/2014 and Directives 2004/109/EC, 2006/43/EC and 2013/34/EU as regards to corporate sustainability reporting.

32 Code of Ethics of OTP Bank Plc. and the OTP Group

33 Anti-corruption Policy of OTP Group

34 OTP Bank ESG performance

35 OTP Bank Sustainability Reports

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