

Announcement EMIR – Disclosure Pursuant to Article 11(11) of the EMIR Regulation

Effective as from: 22. December 2025

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OTP Bank Plc.

Registered office: H-1051 Budapest, Nádor utca 16.
Registered with the Court of Registry of the Metropolitan Court of Justice under corporate registration No. 01-10-041585

LEI: 529900W3MOO00A18X956

Central mailing address: 1876 Budapest

Website: http://www.otpbank.hu



Disclosure of information pursuant to Article 11(11) of REGULATION (EU) No 648/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2012 on OTC derivatives, central counterparties and trade repositories

Pursuant to Article 11(3) of REGULATION (EU) No 648/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR Regulation) – inter alia – financial counterparties shall have risk-management procedures that require the exchange of collateral with respect to OTC derivative contracts. Pursuant to Article 11(6) of the EMIR Regulation financial counterparties, which are part of the same group, and which are established in different Member States, shall be exempt from this requirement on the basis of a positive decision of both relevant competent authorities. Pursuant to Article 11(11) of the EMIR Regulation and Article 20 of COMMISSION DELEGATED REGULATION (EU) No 149/2013 of 19 December 2012 supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council with regard to regulatory technical standards on indirect clearing arrangements, the clearing obligation, the public register, access to a trading venue, non-financial counterparties, and risk mitigation techniques for OTC derivatives contracts not cleared by a CCP, the following information on exemption shall be disclosed publicly.

Legal counterparties	Relationship between the counterparties	Type of exemption, its full or partial nature	Notional aggregate amount of OTC	Start of exemption (date of	Authorisation number
	the counterparties	ruii or partial flature	derivative contracts	authorisation)	
			per year	,	
			(expected, estimated		
			annual turnover data,		
			gross amount in		
			million EUR)		
DSK Bank EAD (registered	DSK Bank EAD is a fully	type: Exemption from	278,850	01 March 2022.	H-KE-III-116/2022.
seat: 19, Moskovska Str.	consolidated affiliate	the obligation to			
1036 Sofia, Bulgaria, LEI-	of OTP Bank Plc.	establish risk-			
identifier:		management			
529900GEH0DAUTAXUA94)		procedures for the			
OTP Bank Plc.,		exchange of collateral			
registered office: 1051		in respect of OTC			
Budapest, Nádor u. 16.,		derivative contracts			
company registration		pursuant to Article			
number: Cg. 01-10-041585,					



registered by the Company Registry Court of Budapest- Capital Regional Court, LEI identifier: 529900W3MOO00A18X956		11(3) of the EMIR Regulation nature: the exemption is full.			
OTP banka d.d. (registered seat: Slovenska cesta 58, SI-1000 Ljubljana, Slovenia; LEI-identifier: 549300J0GSZ83GTKBZ89) OTP Bank Plc., registered office: 1051 Budapest, Nádor u. 16., company registration number: Cg. 01-10-041585, registered by the Company Registry Court of Budapest-Capital Regional Court, LEI identifier: 529900W3MOO00A18X956	OTP banka d.d is a fully consolidated affiliate of OTP Bank Plc.	type: Exemption from the obligation to establish riskmanagement procedures for the exchange of collateral in respect of OTC derivative contracts pursuant to Article 11(3) of the EMIR Regulation nature: the exemption is full.	278,850	12 January 2024	H-KE-III-18/2024.