

Ethics Committee's Information Note

In accordance with its usual practice, the Ethics Committee has reviewed the operation of OTP Bank Plc. in 2023 in terms of compliance with the principles and expected forms of conduct set out in the Code of Ethics.

At OTP Bank Plc. the Compliance Directorate is responsible for continuously monitoring, advising and facilitating the compliance with the requirements of the Code of Ethics. According to this obligation the Compliance Directorate informed the Ethics Committee of the results of the bi-annual ethics risk assessment and the investigations of ethics issues it has carried out. Whereas the personal scope of the Code of Ethics covers all employees and executive officers of OTP Bank Plc., as well as all personnel who appear before the public clearly as representatives of OTP Bank Plc. in the course of the performance of their contractual obligations, it has major importance to inform all of them about the norms of ethics and raise awareness in this regard. To this end, the Bank requires from all employees to take part on ethics e-learning trainings and expects its representatives to understand the Code of Ethics, to acknowledge it as binding and to ensure that it is complied with. The OTP Group has issued a separate Partner Code of Ethics, which contains the minimum business and ethical standards that it expects suppliers, sponsored partners and other organizations doing business with a member of the OTP Group to comply with.

The Ethics Committee has revised the investigations of ethics issues based on notifications submitted in 2023 and identified no significant ethical violations.

According to the information given the Ethics Committee states that OTP Bank Plc. did not provide pecuniary or non-pecuniary support for any political party, organization or any member or representative thereof in 2023.