

### ANNEX L

## TO THE INVESTMENT SERVICES BUSINESS REGULATIONS

# Announcement regarding the sale of financial instruments data and information by OTP Bank Plc.<sup>1</sup>

Effective from: 7 July 2025

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#### **OTP Bank Plc.**

Registered office: H-1051 Budapest, Nádor utca 16.
Registered with the Company Registry Court of Budapest-Capital Regional Court under No. 01-10-041585
Central mailing address: H-1876 Budapest
Website: <a href="https://www.otpbank.hu">https://www.otpbank.hu</a>

<sup>1</sup> On the effective time of this Announcement, the Bank shall provide the service to a limited extent, the details of which are available on OTP SingleMarket.

- 1. In the course of its sales activities related to financial instruments, the Bank sells stock exchange information and data from the following exchanges:
  - a) **Budapest Stock Exchange Plc.** (registered office: 1013 Budapest, Krisztina Blvd. 55., company registration number: 01-10-044764)
  - b) **Deutsche Börse AG** (60485 Frankfurt/Main, Németország)
  - c) Nasdaq, Inc. (805 King Farm Boulevard Rockville, MD 20850 USA)
- 2. The use of data and information provided by the stock exchanges is subject to the current terms and conditions of the following documents:

#### a) Budapest Stock Exchange Plc.

- Budapest Stock Exchange Public Limited Company Information Service Agreement
- Budapest Stock Exchange Public Limited Company Information Service Guidelines

#### Availability of the documents:

https://www.bet.hu/Vendorok/vendor-tudastar/informacioszolgaltatasi-szerzodes

#### b) Deutsche Börse AG

- Market Data Dissemination Agreement of Deutsche Börse AG
- General Terms and Conditions to the Market Data Dissemination Agreement of Deutsche Börse AG

#### Availability of the documents:

https://www.mds.deutsche-boerse.com/mds-en/real-time-data/agreements

- c) Nasdaq, Inc.
- NASDAQ Global Data Agreement
- NASDAQ Global Subscriber Agreement

#### Availability of the documents:

https://www.nasdagtrader.com/Trader.aspx?id=GDP Ops

- 3. Regarding the use of stock market data and information, the following individuals are considered professional or non-professional (professional or non-professional) subscribers according to the conditions specified by the stock exchanges mentioned in point 2 above<sup>2</sup>:
  - a) Budapest Stock Exchange Plc.

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<sup>&</sup>lt;sup>2</sup> The texts quoted in this section are for informational purposes only. It is possible that the definitions quoted in this section have been modified by the stock exchanges after the publication of this document, therefore the conditions published by the stock exchanges at any given time shall prevail regarding the definition of professional and non-professional subscribers. The translation of the quoted texts is for informational purposes only, and the official text of the definitions shall be the wording published by the stock exchanges in the original language.

<u>Non-Professional Subscriber</u>: means a customer who does not meet the definition of a Professional Subscriber and uses the Information solely for private, non-commercial purposes.

<u>Professional Customer means</u> a customer who uses market data to carry out a regulated financial service or regulated financial activity or to provide a service for third parties, or who is considered to be a large undertaking, i.e. meeting two of the following size requirements on a company basis: (i) balance sheet total of EUR 20 000 000 (ii) net turnover of EUR 40 000 000 (iii) own funds of EUR 2 000 000.

#### b) Deutsche Börse AG

<u>Professional Customer</u> means a customer who uses market data to carry out a regulated financial service or regulated financial activity or to provide a service for third parties, or who is considered to be a large undertaking, i.e. meeting two of the following size requirements on a company basis: (i) balance sheet total of EUR 20 000 000 (ii) net turnover of EUR 40 000 000 (iii) own funds of EUR 2 000 000.

Non-Professional Customer means a customer who does not meet the definition of Professional Customer.

### c) Nasdaq, Inc.3

Non-Professional Subscriber: Any natural person who is **NOT**: (a) registered or qualified in any capacity with the SEC, the Commodities Futures Trading Commission, any state securities agency, any securities exchange or association or any commodities or futures contract market or association; (b) engaged as an "investment advisor" as that term is defined in Section 202(a)(11) of the Investment Advisors Act of 1940 (whether or not registered or qualified under that Act); or (c) employed by a bank or other organization exempt from registration under federal or state securities laws to perform functions that would require registration or qualification if such functions were performed for an organization not soexempt.

<u>Professional Subscriber</u>: All other persons who do not meet the definition of Non-Professional Subscriber.

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<sup>&</sup>lt;sup>3</sup> The authorities or laws referred to in this section operate under the jurisdiction of the United States, or are laws enacted in the United States.