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Resolution number: H-PM-I-11/2020.

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

The MNB warns the Bank to

1. **secure** the analysis and assessment and –if necessary- the implementation of measures in respect of anti-money laundering and financing of terrorism without delay concerning clients or transactions detected by the filtering system, within the deadline specified by the legal provisions on anti-money laundering and financing of terrorism in their up-to-date version;
2. **review** its notification practice **and secure** the immediate and comprehensive implementation of notifications and repeated notifications in accordance with the legal provisions on anti-money laundering and financing of terrorism in their up-to-date version, in particular in view of the transactions already previously declared by the Bank as well as the transactions of clients concerned by termination, (that were) carried out following the notification and/or during the termination period.

The Bank is obliged to publish the operative part of the present resolution on its website immediately.

No procedural charges have incurred during the supervisory procedure.

No appeal can be made against the resolution, however, at the same time, whose rights or legitimate interests are directly affected by the administrative activity, may initiate administrative lawsuit at the Budapest-Capital Regional Court against the resolution within 30 days of the publication of the decision citing violation of law 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.](https://www.mnb.hu/felugyelet/engedelyezes-es-intezmenyfelugyeles/hatarozatok-es-vegzesek-keresese)) Legal representation is mandatory.

The submission of the application has no suspensory effect on the entry into force of the decision, but the person whose rights and legitimate interests are violated by the administrative activity or the maintenance of the situation caused, may request immediate legal protection in order to remedy the imminent disadvantage, to temporarily settle the disputed legal relationship or to maintain the status quo.

The court will, in principle, decide the trial out of court. The hearing will be taken, if the plaintiff requests in the application. There is no place for excuse, if the request is not taken.

Budapest, 21th October, 2020.