

# **Supplementary Announcement**

on general information on the marketing of securities and on the fulfilment of certain transactions to the Investment Services Business Regulations

Effective from: 1 November 2025
Published on: 17 October 2025

The modification of the Announcement was necessary because, as of November 1, 2025, stock exchange orders placed in Bank branches and through the OTPdirekt telephone customer service will be discontinued.

#### 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: https://www.otpbank.hu

The amended provisions of this Announcement, highlighted in italics and grey, indicate changes relative to the Announcement effective from 28 October 2025.

# **TABLE OF CONTENTS**

1.	Time limits, execution venue and execution partner for the marketing of securities	4
2.	Client restrictions on the marketing of securities and opening of accounts (acquisition restrictions)	11
3.	Client consent	12
4.	LEI code and natural person identifiers	13
4.1	LEI code	13
4.1.		_
4.1.		
4.1.	3 LEI code acceptance criteria	
	1 Generation of natural person identifiers	
4.2.	•	
4.2.		
4.3	Transactions refused in the absence of a national client identifier and LEI code	15
5.	Validity period of stock exchange orders and information on the price data service	
6.	Tick size set by the Budapest Stock Exchange	
7.	Scope and rate of collateral acceptable for the marketing of securities	20
8.	Minimum amounts used in securities distribution	22
9.	Distribution limits applied to the distribution of securities	23
10.	Execution and settlement rules of securities	24
11.	Standing buy orders	28
12.	Certificates	29
13.	Determination of the target market for financial instruments	29
14.	Risk classification of financial instruments	30
15.	Complex products	37
	Structured products, Deposits, Dual currency structured investment DCI, Dual Currency Street DCFA	
17.	Deleted	38
18.	Risk profile / financial instrument risk classification matrix	38
19.	Combined savings	39
20.	Account schemes that can be linked to a securities account	39
21.	Payment account schemes	39
22.	Client account scheme	40
23.	Stability Savings Account scheme	40
24.	Conditions for receiving transfers of securities to a securities account with the Bank	40
25.	Notification of the registrar	41
26.	Key principles for the generation of the securities portfolio (portfolio valuation price)	42
27.	Deviating rules for the generation of the portfolio valuation price for Clients with a private banking 43	contract
	Detailed rules on the values serving as the basis of settlement with the collateral provider when enfor	cing the

	orcement of collateral security established on a financial instrument with a collateral contract concluded	
	March 2014:	
	orcement of collateral security established on a financial instrument with a collateral contract concluded	
	rch 2014:	
29.	Key principles of forced sales	45
30.	Information on deposit insurance, investor protection and securities guarantees	46
	ional Deposit Insurance Fund (NDIF)	
	estor Protection Fund (IPF)	
	asury bills and government securities	
	ital guarantee provided by the Bankprintintial guarantee provided by OTP Alapkezelő Zrt	
31.	Discontinuation of ownership of dematerialised securities	48
32.	Cancellation of securities that have become invalid due to the termination of the issuer	48
33.	External information on corporate events	48
34.	Foreign currency conversion	49
35.	EMIR information	50
36.	Stock matching methods in the Bank's distribution channels	50
37.	Information relating to the annual certificate on controlled capital market transactions issued by the	Bank50
38.	Client identification via SWIFT and GIROHáló	51
39.	Use of number formats on order contracts and certificates relating to securities transactions	52
40.	Recording of financial assets arising from investment services transactions	52
	Rules for the execution of transactions affected by Act XLIII of 2021 on the Establishment and Operata Reporting Background related to the Identification Tasks of Financial and Other Service Provide	
42.	Rules on linked transactions	53
43.	Rules for managing the target portfolio	53
44.	LTIA T+3 Forward transaction	53
	Transactions that can be carried out by the Securities Account Holder and the persons who have co	

#### **Notices and disclaimers**

Other terms and conditions relating to the investment services and ancillary services of OTP Bank Plc. (hereinafter: "Bank") are set out in the currently effective Investment Services Business Regulations (hereinafter: "Business Regulations" or "Investment Services Business Regulations" or "Investment Services Business Regulations" or "ISBR"), and in the other business regulations, announcements and contracts referred to therein, which are available in print form in the Branch and electronically on the Bank's website. Unless otherwise defined in this Supplementary Announcement, the terms used herein shall have the meanings assigned to them in the Business Regulations. Before using the investment services or ancillary services of OTP Bank Plc., please read the Bank's Standard Prior Information Announcement and the documents referred to therein in order to make an investment decision based on the information you have about the investment services, the related transactions and the financial instruments. If you have any questions about the contents of this announcement or other documents, or if you do not have access to any of the documents or information referred to therein, please contact the competent Branch, where our staff are happy to help you.

- 1. Time limits, execution venue and execution partner for the marketing of securities
- 1.1 Orders may be placed in the Bank's Branches, via the OTP Private Banking voice-recorded telephone line and via fax, and consolidated securities accounts and client accounts may be opened and closed during the opening hours of the securities account management system (on banking days between 7:45 and 19:00), but only from the opening of the branch until the closing of the branch. The Bank is not obliged to accept orders outside Business Hours.
- **1.2 Through the Global Markets Transaction Channel**, orders can be placed on the Budapest Stock Exchange until 17:15, on the electronic trading platform of Deutsche Börse A.G. (Xetra) until 17:35, and on the NYSE, NASDAQ, AMEX, CME markets until 20:00. Fund unit buy and sell orders placed during Business Hours between 16:30-18:00 and OTC buy and sell orders placed during operating hours between 17:30-18:00 are accepted with a value date of the following banking day.
- 1.3 Orders recorded through the Bank's electronic channels (OTPdirekt Internet Service, OTPdirekt Broker Service, OTPdirekt SmartBroker Service, OTP InternetBank and MobileBank, OTP SingleMarket) can be received 24/7 on the basis of the following:
  - buy and sell orders placed between 0:00 on banking days and the cut-off time of the given security are accepted and settled with the value date of the given banking day.
  - buy and sell orders placed after the cut-off time of the given security and between 24:00 on banking days are accepted and settled with the value date of the following banking day.
  - buy and sell orders placed **on bank holidays** are accepted and settled with the value date of the following banking day.
  - the Bank continuously receives stock market orders through the OTP SingleMarket service. On a trading day, orders submitted from 00:00 until market closing will be accepted with same-day validity, while orders submitted after closing until 24:00, as well as those submitted on a nontrading day, will be accepted with validity for the next trading day.

The collateral must be available in the required account at the time the order is placed.

This means that, in the case of buy orders, the freely available balance of the Client's linked payment account is immediately debited when the funds are provided. The exception to this is OTC buy and sell orders placed on a bank holiday, as for these orders the collateral must be available in the required account when processing starts on the next banking day.

If the collateral (funds or securities) required for the execution of the order is not available, the Bank does not execute the order.

As such, the executability and execution status of orders entered through the OTPdirekt service – with the exception of OTC buy and sell orders – can be checked after the order has been placed.

Only orders to buy and sell shares on the stock exchange can be recorded via the OTPdirekt Smartbroker service.

The OTP Internetbank and Mobilebank service allows for orders for the purchase of retail government securities in primary placement and for their sale in secondary trading, for one-off buy and sell orders of investment fund

4

units managed by OTP Alapkezelő Zrt. and OTP Ingatlan Alapkezelő Zrt. (hereinafter: OTP Funds) in the context of continuous distribution, and for the purchase and sale of certain OTP-issued bonds in primary placement and for their sale in secondary trading. Through OTP Internetbank, subscription orders can be recorded for capital-protected funds managed by OTP Alapkezelő Zrt. and OTP Ingatlan Alapkezelő Zrt. and Standing Buy Orders can be placed, modified and cancelled for certain investment units managed by OTP Alapkezelő Zrt.

- **1.4** Orders placed through the **OTPdirekt telephone banking service** can be received and information may be requested between 06:00 and 22:00 as follows:
  - buy and sell orders placed between 06:00 on banking days and the cut-off time of the given security are accepted and settled with the value date of the given banking day.
  - buy and sell orders placed after the cut-off time of the given security and between 22:00 on banking days are accepted and settled with the value date of the following banking day.
  - buy and sell orders placed on bank holidays are accepted and settled with the value date of the following banking day.

Orders cannot be placed via the OTPdirekt telephone banking service between 22:00 and 06:00.

The collateral must be available in the required account at the time the order is placed. This means that, in the case of buy orders, the freely available balance of the Client's linked payment account is immediately debited when the funds are provided. The exception to this is OTC buy and sell orders placed on a bank holiday, as for these orders the collateral must be available in the required account when processing starts on the next banking day.

If the collateral (funds or securities) required for the execution of the order is not available, the Bank does not accept the order.

Outside of operating hours, orders for redemption of fund units cannot be initiated via the OTPdirekt telephone banking service.

The above time limits apply to the reception of OTC buy and sell deals, but the following restrictions also apply to other types of transactions:

			Cut-off times							
			At bank branches	Via OTPdirekt channels and OTP Internet and MobileBank*						
		Auction order	During the period available for the recording of auction bids, the Bank accepts orders until branch closure, but no later than 17:00 every day, taking into account the provisions of the documentation of the placement (e.g. Prospectus, Announcement). The Client may modify or cancel an auction order only at the branch where the original order was placed.	no order may be placed						
fering	Subscription	Bonds issued by OTP	time limits for the subscription period may be subject to change based on the Prospectus or Final Terms applicable to the scription. On the last day of the subscription period, only offers received by 12:00 are accepted. Using the OTPdirekt telephone king, OTPdirekt Internet and OTPdirekt Broker services, OTP Internet and Mobilebank services, subscription orders can be ed if the marketing documents of the financial instrument allow. The subscription of securities in foreign currencies for a Pension ngs Securities Account is not possible through the OTPdirekt Internet and OTPdirekt Broker services.							
Primary offering		Retail Government Securities	The time limits for the subscription period may be subject to change based on the Public Offer applicable to the subscription. Using the OTPdirekt telephone banking, OTPdirekt Internet, OTPdirekt Broker, OTP Internet and Mobilebank services, subscription or orders can be placed if the marketing documents of the financial instrument allow. The subscription of securities in foreign currencies for a Pension Savings Securities Account is not possible through the OTPdirekt Internet and OTPdirekt Broker services.							
		Other securities	The time limits for the subscription period may be subject to change based the OTPdirekt telephone banking, OTPdirekt Internet, OTPdirekt Broker, orders can be placed if the marketing documents of the financial instructurencies for a Pension Savings Securities Account is not possible throug	OTP Internetbank and Mobilbank services, subscription ument allow. The subscription of securities in foreign						
	Tap issue		The time limits for the placement period may be subject to change based security. Using the OTPdirekt telephone banking, OTPdirekt Internet, OT subscription orders can be placed if the marketing documents of the fina foreign currencies for a Pension Savings Securities Account is not possible services.	Pdirekt Broker, OTP Internet and Mobilebank services, ncial instrument allow. The subscription of securities in						
Secondary market	OTC auction (BSE)		During the period available for the recording of auction bids, the Bank accepts orders until branch closure, but no later than 17:00 every day, taking into account the provisions of the documentation of the placement (e.g. Prospectus, Announcement). The Client may modify or cancel an auction order only at the branch where the original order was placed.	no order may be placed						

	OTC deals	OTC buy and sell orders with same-day settlement are accepted by the B on the next banking day.	ank until 17:30, orders placed after this time are settled
distribution	OTP Fund units**	Same-day processing of orders for the sale of OTP fund units is accepted orders for the sale of OTP AHA Euró Származtatott Alapba Fektető Alap (OTP Supra Euró Származtatott Alapba Fektető Alap (Fund investing in OT Származtatott Alapba Fektető Alap (Fund investing in OTP New Europe E accepted by the Bank until 14:00 on the given day. The processing of orde i.e. this is considered to be T-day, with the proviso that the collateral may I day), at the Bank's discretion.	Fund investing in OTP Absolute Return Euro Fund), P Supra Euro Fund), OTP Új Európa Euró uro Fund) units, for which same-day processing is ers placed after this time starts on the next trading day,
unit	Units in, Accorde HOLD*** and VIG**** funds	The Bank accepts the same-day processing of buy or sell orders until 15:00, except for the HOLD VM EURO Absolute Return Fund of Funds, HOLD Fund of Funds and HOLD EURO Fund of Funds where the Bank accepts the same-day processing of buy or sell orders until 14:15.	no order may be placed
Fund	Units of foreign funds*****	The Bank accepts the same-day processing of buy or sell orders of foreign fund units until 10:00 for BlackRock funds, 12:00 for Schroders and Fidelity funds, 14:00 for BNP, PIMCO and J.P. Morgan funds, and 16:00 for Templeton Funds.	no order may be placed

<sup>\*</sup>The OTP Internetbank and Mobilebank service allows for orders for the purchase of retail government securities in primary placement and for their sale in secondary trading, as well as for one-off buy and sell orders of OTP fund units in the context of continuous distribution. It also enables orders for the purchase of OTP bonds in primary placement and their sale in secondary trading. Through OTP Internetbank, subscription orders can be recorded for capital-protected funds managed by OTP Alapkezelő Zrt. and OTP Ingatlan Alapkezelő Zrt.

#### **Government securities auctions:**

Hungarian Government Bonds and Discount Treasury Bills are sold at multiple rate auctions, i.e. all investors can access government securities at the price they bid. Auctions are announced by the ÁKK at least 3 working days before the auction day. Public offers are published on the ÁKK website (<a href="www.akk.hu">www.akk.hu</a>), the BSE website (<a href="www.akk.hu">www.akk.hu</a>), and the website operated by the Magyar Nemzeti Bank (MNB) (<a href="www.kozzetetelek.hu">www.kozzetetelek.hu</a>).

Auction results are announced at 11:30 on the day of the auction. The Hungarian State (for the purposes of this subheading, hereinafter: "Issuer") reserves the right to deviate from the quantities announced or to declare the auction unsuccessful depending on the bids received.

The Issuance Calendar, published by the ÁKK, containing the exact schedule of planned government securities issues (auctions, subscriptions) and other related information (credits, maturities) is available on the ÁKK website (<a href="https://www.akk.hu">www.akk.hu</a>), under Analyses, Statistics/Publications menu. The Issuer currently uses its individual discretion to decide whether or not to announce an auction in a given week.

### **Discount Treasury Bill auctions**

Discount Treasury Bills are marketed by auction according to the following order of issue:

- Discount Treasury Bills with 3 months residual maturity are auctioned Tuesday of every week,
- Discount Treasury Bills with 12 months residual maturity are auctioned Thursday of every evennumbered week,
- Liquidity Discount Treasury Bill (Discount Treasury Bills with a residual maturity of less than 3 months issued for a series of Discount Treasury Bills with an original remaining maturity of 3 months) auctions are held on an ad-hoc basis on Mondays, as per a separate decision by the ÁKK.
- Settlement of Discount Treasury Bills always takes place on the Wednesday of the week following the week of the auction.

The bid submitted for the auction must include the return expected by the investor.

#### **Hungarian Government Bond auctions**

The Issuer holds the Hungarian Government Bond auctions every odd-numbered week on Thursday, with settlement always taking place on the Wednesday of the week following the week of the auction. The auction bid must indicate the net price offered by the bidder.

<sup>\*\*</sup>Only buy and redemption orders for units of the liquid series of the OTP Russian Equity Fund may be placed exclusively at bank branches, via the OTPdirekt telephone banking service and, in the case of Private Banking clients, via PB fixed telephone, and standing purchase order is not possible at any distribution point.

<sup>\*\*\*</sup>The name of Concorde Alapkezelő Zrt. was changed to HOLD Alapkezelő Zrt. as of 11 September 2017.

<sup>\*\*\*\*</sup>From 15 May 2023, Aegon Hungary Investment Fund Management Company Ltd. operates under the name VIG Asset Management Hungary Company Ltd.

<sup>\*\*\*\*\*</sup>Orders to sell/buy foreign fund units are accepted only on dual banking days. A dual banking day is a working day on which, according to the Issuer's disclosure, the Fund Unit may be traded and net asset value is determined for the given Compartment and the relevant business day has also been declared a Trading Day by OTP Bank.

Procedure for handling standing securities buy orders:

Period	Transaction	Via branch	As nart of the Oledirekt telephone hanking service				
Period between branch opening and closing  The Bank accepts orders.  Sometimes of the Bank accepts orders.							
Ü	modification		•				
	withdrawal						
Period after branch closing	modification Modification or withdo		The Bank accepts orders.		The Bank accepts orders; however, Standing Buy Orders with quarterly frequency cannot be placed.		
			Modification or withdrawal is only allowed for an order whose execution date is not the next banking day.	Not available	Not available		

Trading hours on the Budapest Stock Exchange (BSE) spot market:

raamig neare en	the Badapest Stock Exchange (BOE) spo	· · · · · · · · · · · · · · · · · · ·		
Trading models	Continuous trading with auctions model	Continuous auction model	Auction model	
Traded securities	Prime and Standard market equities, ETFs, Xtend equities, fund	Structured products:		
Trading phases	units, government securities, mortgage bonds, corporate bonds, compensation notes, structured bonds	certificates/warrants	Decategorised equities	
Pre-trade phase	8:15-8:30	8:30-9:00	8:15-8:30	
Opening auction	8:30-9:00	ı	8:30-9:00	
Continuous trading	9:00-17:00	ı	-	
Auction phase			11:00-11:30; 14:00-14:30	
Continuous auctions	-	9:00-17:00	-	
Closing auction	17:00-17:05	-	16:35-17:05	
Trade-at-Close**	17:05-17:15	-	-	
End-Trading Phase	17:15-17:20	17:00-17:20	17:05-17:20	

The trading phases and sub-phases of the above trading models are detailed in the consolidated Resolution No. 550/2013 of the CEO of the BSE, as amended several times (www.bet.hu).

Procedure for handling BSE commission agency transactions by trading model:

	ontinuou	s trading with	Via bank branches and the	OTPdirek			Via the OTPdirekt Internet, OTPdirekt Broker and OTP SmartBroker					
	aud	ctions	<del></del>	ervice	Market		Se	rvices Market				
	ne and hase	Transaction	Limit	Normal	Fill-or- Kill	Immedi ate-or- Cancel	Limit / Stop Limit / Stop Market*	Normal	Fill-or-Kill	Immediate -or-Cancel		
		Recording	We accept it and forward it to the trading system after 8:15	<del>Not</del> <del>available</del>			We accept it and forward it to the trading system after 8:15	Not available	We accept it and forward it to the trading system after 9:00			
7:45-8:15	Pre-trade	Withdrawal	Only orders that have not ye system care			ne trading	Only orders that have not yet been with	transmitted hdrawn.	to the trading sy	stem can be		
7:45-	Pre-	Modification	Not	available			Orders that have not yet been transmitted to the trading system may be modified by withdrawing the original order and submitting a new order.	Not available	Orders that have not yet been transmitted to the trading system may be modified by withdrawing the original order and submitting a new order.			
		Recording	We accept it and forward it to the trading system. It becomes valid from 8:30.	Not	Not	<del>Not</del>	We acce forward trading sy 9:0	it to the stem after	We accept it and forward it to the trading system. It becomes valid from 8:30.		We accept it a to the trading 9:0	system after
8:15-8:30	Pre-trade phase	Withdrawal  Modification	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	available	ble Orders that have not yet been transmitted to the trading system may be withdrawn		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new order.	Not available	Orders that have not yet been transmitted to the trading system may be withdrawn/modified.			

0	tion	Recording	We accept it and forward it to the trading system	- Not	We accept it and forward it to the trading system after 9:00	We accept it and forward it to the trading system.		We accept it and forward it to the trading system after 9:00		
8:30-9:00	Opening auction	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	available not yet been transmitted to the trading system may be withdrawn		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new	Not available	Orders that have not yet been transmitted to the trading system may be withdrawn/modified.		
		Modification	Not	<del>available</del>		order.				
0	ading	Recording	We accept it and forward it to the trading system.	Not available	We accept it and forward it to the trading system.	We accept it and forward it to the trading system.	Not available	We accept it and forward it to the trading system.		
9:00-17:00	Continuous trading	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	Not available		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new		Not available		
		Modification	<del>Not</del>	available		order.				
15	tion	Recording	We accept it and forward it to the trading system.			We accept it and forward it to the trading system.				
17:00-17:05	Closing auction	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	#	Not available	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new	Not available			
		Modification	Not	available		order.				
		Recording	We accept it and forward it to the trading system.	<del>Not</del> <del>available</del>	We accept it and forward it to the trading system.	We accept it and forward it to the trading system (except Stop orders).	Not available	We accept it and forward it to the trading system		
17:05-17:15*	Trade-at-Close**	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	Not available		<del>Not available</del>		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is		
17:	Trade	Modification	<del>Not</del>	available		implemented by withdrawing the original order and submitting a new order.	Not available			
17:15-17:20*	ding Phase	Recording	The trading system does not accept one-day orders valid only for the given day. Only orders valid for several days or from the next trading day can be placed. Orders are valid from the next trading day.	1	Not available	The trading system does not accept one-day orders valid only for the given day. Only orders valid for several days or from the next trading day can be placed. Orders are valid from the next trading day.	Not available			
17:15	End-Trading	Withdrawal  Modification	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	available		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new				
						order.	Not	We accept it and forward it		
from 17:20	Post-trade	Recording		availat t-		Can be accepted with validity for the following trading day	available	to the trading system after 9:00		
Eo	ost-	Withdrawal	<del>Not</del> -	<del>available</del>		Orders that have not yet been transmitted to the trading system can be				
=	ъ.	Modification				withdrawn or modified The modification is implemented by withdrawing the original order and submitting a new order.				

•	Continuous auction Wia bank branches and the OTPdirekt telephon model banking service				one	Via the OTPdirekt Internet, OTPdirekt Broker and OTP SmartBroker serv				
				Market				Market		
	ne and hase	Transaction	Limit	Normal	Fill- or-Kill	Imm ediat e-or- Can cel	Limit / Stop Limit / Stop Market*	Normal	Fill- or-Kill	Imme diate- or- Cance I
7:45	Pre- trad e	Recording	We accept it and forv trading system a		Not availan		We accept it and forward it to the trading system after 8:30		Not av	ailable

		Withdrawal  Modification	Orders that have not yet been transmitted to the trading system may be withdrawn Not available		Orders that have not yet been transmitted to the trading system may be withdrawn/modified. The modification is implemented by withdrawing the original order and submitting a new order.		
0(	phase	Recording	We accept it and forward it to the trading system.		We accept it and forward it to the trading system.		
8:30-9:00	-trade	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	Not available	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a	Not available	
	Pre	Modification	Not available		new order.		
00	sne	Recording	We accept it and forward it to the trading system		We accept it and forward it to the trading system		
9:00-17:00	Continuous auctions	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn	Not available	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a	Not available	
	•	Modification	Not available		new order.		
17:00-17:20	ding Phase	Recording	The trading system does not accept one day orders valid only for the given day. Only orders valid for several days or from the next trading day can be placed. Orders are valid from the next trading day.	Not available	The trading system does not accept one-day orders valid only for the given day. Only orders valid for several days or from the next trading day can be placed. Orders are valid from the next trading day.	Not available	
17:0	End-Trading	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn		An order that has been accepted by the trading system but not yet or partially executed can be withdrawn / modified The modification is implemented by withdrawing the original order and submitting a new order.		
		Modification	Not available				
l		Recording			Can be accepted with validity for the following trading day.	Not available	
from	Post- trade	Withdrawal Not available Modification			Orders that have not yet been transmitted to the trading systemodified/withdrawn. The modification is implemented by withdrawn order and submitting a new order.		

А	uction	model	Via bank branches and the O	Pdirekt telephone ban	king service	) \	Via the OTPdirekt Internet, OTPdirekt Broke	er and OTP SmartBr	oker service	
				Market				Market		
Time Pha		Transaction	<del>Limit</del>	<del>Normal</del>	Fill- or-Kill Can	e- - 16	Limit / Stop Limit / Stop Market*	Normal	Fill- or-Kill Can el	
15	de	Recording	We accept it and forward it to the 8:15	e trading system after			We accept it and forward it to the trading	system after 8:15		
7:45-8:15	Pre-trade	Withdrawal	Orders that have not yet bee trading system may b		<del>Not availab</del>		Orders that have not yet been transmitted to may be withdrawn/modified. The modificat	ion is implemented	Not availab	
	Modification Not available			available			by withdrawing the original order and subr	nitting a new order.		
08	phase	Recording	We accept it and forward it to becomes valid from			We accept it and forward it to the trading s valid from 8:30.	system. It becomes			
8:15-8:30	e-trade p	Withdrawal System but not yet or partially executed can be withdrawn		ly executed can be	<del>Not available</del>		An order that has been accepted and alrea trading system but not yet or partially e withdrawn /modified. The modification is	executed can be simplemented by	Not available	
	Pr	Modification	Not :	available			withdrawing the original order and submi	tting a new order.		
0	ction	Recording	We accept it and forward it to the it only becomes valid				We accept it and forward it to the trading becomes valid from 8:30			
8:30-9:00	Opening auction	Withdrawal	An order that has been accepted by the trading system but not yet or partially executed can be withdrawn		Not availab		An order that has been accepted by the tra yet or partially executed can be withdraw modification is implemented by withdrawin	vn / modified The	Not available	
	Op	Modification	Not:	available			and submitting a new ord	er.		
0	se	Recording	We accept it and forward it to	the trading system			We accept it and forward it to the tra			
11:00-11:30 14:00-14:30	Auction phase	Withdrawal	An order that has been acce system but not yet or partial withdrawr	ly executed can be	Not availab	,,,,	An order that has been accepted by the tra yet or partially executed can be withdraw modification is implemented by withdrawin	vn / modified The	Not availab	
	Au	Modification	Not .	available	1		and submitting a new order.			
05	auction	Recording	We accept it and forward it to	the trading system			We accept it and forward it to the tra	ading system		
16:35-17:05	Closing auc	Withdrawal	An order that has been acce system but not yet or partial withdrawr	ly executed can be	Not availab		An order that has been accepted by the tra yet or partially executed can be withdrav modification is implemented by withdrawin	vn / modified The g the original order	Not availab	
_	Cic	Modification	Not .	<del>available</del>			and submitting a new ord	er.		
17:20	End-Trading Phase	Recording	The trading system does not a valid only for the given day. ( several days or from the next placed. Orders are valid from	Only orders valid for t trading day can be	Not availab	f	The trading system does not accept one-d for the given day. Only orders valid for sevenext trading day can be placed. Orders are trading day.	eral days or from the	Nickaria	
17:05-17:20	≣nd-Tradii	Withdrawal	An order that has been acce system but not yet or partial withdraw	ly executed can be	Not available		An order that has been accepted by the tra yet or partially executed can be withdraw modification is implemented by withdrawin	vn / modified The g the original order	Not availab	
		Modification	<del>NOt i</del>	<del>available</del>			and submitting a new ord	CI.		

7:20	ade	Recording		Can be accepted with validity for the following trading day.	Not available
n 17	st-tra	Withdrawal	Not available	Orders that have not yet been transmitted to the trading syste	
ē	တို	Modification		modified/withdrawn. The modification is implemented by with	drawing the
ш	ш.	Modification		original order and submitting a new order.	

<sup>\*</sup>For any trading model, Stop Limit and Stop Market orders can only be placed via the OTPdirekt Broker and OTP SmartBroker services.

# Procedure for handling BSE commission agency transactions via the OTP SingleMarket service:

Project	Toursetion	Via the OTP SingleMarket service		
Period	of the Stock change  00-8:30)  open the stock arket  00-9:00)  withdrawal  recording  withdrawal  recording	Limit / Stop Limit / Stop Market	Market	
Period between closing and opening of the Stock	recording	The Bank accepts orders with validity for the following trading day and transfers them to the trading system after 8:30 a.m. on the next trading day.	not available	
(17:00-8:30)	withdrawal	Orders that have not yet been transmitted to the trading system may be withdrawn.  Orders that have not yet been transmitted to the trading system can be modified.	not available	
Auction to open the stock market (8:30-9:00)	recording	After the opening of the order book (8:30), the Bank transmits previously accepted orders and continues to accept and transmit new orders to the trading system.		
(0.30-3.00)	withdrawal	Orders accepted by the trading system that have not yet been executed or have been partially executed may be cancelled.		
Stock exchange continuous trading phase	recording	The Bank continuously accepts and transmits orders to the tr	ading system.	
(9:00-17:00)	withdrawal	Orders accepted by the trading system that have not yet been executed or have been partially executed may be cancelled.		

<sup>\*\*</sup>The Trade-at-Close trading phase is activated if a trade is made in the closing phase, even if there is no outstanding volume on either the buy or sell side after the trades are made. A bid only participates in the Trade-at-Close trading phase if the bid price is better than or equal to the closing price. In the Trade-at-Close trading phase, only time priority counts when pairing bids.

Only limit price orders may be submitted for units of public, closed-end OTP Investment Funds listed on the Budapest Stock Exchange.

#### **Execution venues:**

The list of execution venues for the various financial instruments is contained in the Bank's Execution and Allocation Policy.

## **Price monitoring:**

The "Price monitoring" field (Yes or No option) is mandatory for Limit price orders.

For orders placed with price monitoring (Price monitoring field set to "Yes"), the trading system checks the price and if it differs significantly from the market price, the order is rejected.

Without price monitoring (Price monitoring field set to "No"), the trading system does not check the price entered, so it may differ significantly from the current market price.

# 2. Client restrictions on the marketing of securities and opening of accounts (acquisition restrictions)

The securities may be acquired by investors in accordance with the applicable laws and the securities issuance documentation (e.g. Prospectus/Base Prospectus, Information Note, Final Terms). The issuer of the security may restrict the scope of investors, the purchasers of the security in the issuance documents of the security, the restrictions on sale are set out jointly in the Prospectus/Base Prospectus, the Information Note and the Final Terms.

It is the Client's responsibility to verify, based on their personal circumstances and the legal and regulatory provisions applicable to them, and to warrant by signing the order, contract for the subscription, acquisition or other disposition of the securities, that no limitation against them exists that is based on applicable law, regulatory or judicial requirement or included in the trading documentation, on the basis of which they would not be entitled to acquire or own the securities, and that they have all the necessary legal and mental capacities and authorisations that are necessary for acquiring and owning the securities.

It is the responsibility of the Client to review and comply with the provisions of the US Securities Act, Regulation S, including the requirements regarding the scope of persons and additional restrictions.

According to the decision of ÁKK Zrt., the government securities that qualify as Retail Government Securities may only be purchased by resident and non-resident natural persons.

The Distributor may, at its own discretion, determine the range of purchasers of the securities specified in the issuance documentation, taking into account client segments in its distribution activities. Accordingly, certain securities and fund units distributed by the Bank are only available to investors within a specific client segment.

Units of investment funds distributed and sold only to <u>Clients</u> with a Private Banking Master Agreement as defined in the ISBR:

- Aegon, Accorde and HOLD\* and VIG\*\* Funds\*\*\*
- Schroders, Templeton, Blackrock and BNP, Fidelity, PIMCO and J.P. Morgan Funds\*\*\*

Units of investment funds distributed and sold to **Clients** with a **Prestige**, **Private Banking** agreement:

OTP Nyugat-Európai Részvény Alap (OTP Western European Equity Fund), OTP Trend Nemzetközi Részvény (OTP Trend International Equity), OTP EMEA Kötvény (OTP EMEA Bond), OTP Fundman Részvény (OTP Fundman Equity), OTP AHA Euró Származtatott Alapba Fektető Alap (Fund investing in OTP Absolute Return Euro Fund), OTP Supra Euró Származtatott Alapba Fektető Alap (Fund investing in OTP Supra Euro Fund), OTP Új Európa Euró Származtatott Alapba Fektető Alap (Fund investing in OTP New Europe Euro Fund), OTP Supra Dollár Származtatott Alapba Fektető Alap (Funds investing in OTP Supra USD Fund), OTP PRIME Ingatlanbefektetési Alap (OTP PRIME Real Estate Investment Fund)\*\*\*\*\*, OTP PRIME Euró Ingatlanpiaci Alapok Alapja (Fund investing in OTP PRIME Euro Real Estate Fund) (these Funds are available to all Clients through the OTPdirekt Internet, OTPdirekt Broker, and OTP Internet and MobileBank services.)

The VIG and HOLD Funds listed below are also available to Premium clients in the Bank's branch network: VIG Alfa Abszolút Hozamú Befektetési Alap "A" sorozat (VIG Alpha Absolute Return Investment Fund Series "A"), VIG BondMaxx Abszolút Hozamú Kötvény Befektetési Alap (VIG BondMaxx Absolute Return Bond Investment Fund), VIG MegaTrend Részvény Befektetési Alapok Alapja "B" sorozat (VIG MegaTrend Equity Investment Fund of Funds Series "B"), HOLD Kötvény Befektetési Alap (HOLD Bond Investment Fund), HOLD Columbus Globális Értékalapú Abszolút Hozamú Származtatott Befektetési Alap "A" sorozat (HOLD Columbus Globál Value-Based Derivative Absolute Return Investment Fund Series "A").

<sup>\*</sup>The name of Concorde Alapkezelő Zrt. was changed to HOLD Alapkezelő Zrt. as of 11 September 2017.

<sup>\*\*</sup>From 15 May 2023, Aegon Hungary Investment Fund Management Company Ltd. operates under the name VIG Asset Management Hungary Company Ltd.\*\*\*The scope of funds distributed is determined by the joint decision of the Distributor and the Issuer, and as such not all funds registered in Hungary or all currencies of a given fund may be listed by the Distributor. For information on the scope of fund units marketed by the Bank, please contact your Private Banking adviser.

\*\*\*\* Due to the limited number of units of the OTP PRIME Ingatlanbefektetési Alap (OTP PRIME Real Estate Investment Fund) in circulation, the acceptance of buy orders for units of the fund is subject to the information available on the website of OTP Ingatlan Befektetési Alapkezelő Zrt. and the Bank.

We would like to inform our Clients that from 6 December 2022, they may place their orders for the purchase of foreign fund units in the number of units as well as in the amount to be spent on the purchase in accordance with the provisions of Section B.III.4.1.4. of the Investment Services Business Regulations.

The option to conclude a Consolidated Securities Account contract via the OTP InternetBank service is provided by the Bank to clients who are directly approached by the Bank with an offer to use the service.

#### 3. Client consent

Pursuant to Section A.III.2.7. of the Business Regulations, in connection with the investment services and ancillary services provided to the Client under the Business Regulations, the Client's consent is required for the procedures specified by the Bank. The Bank informs the Client that the Client is entitled to decide what consent they give.

The Bank informs the Client that, due to the nature of the given investment service or ancillary service or the way in which the investment service or ancillary service is provided, the Bank is entitled to provide the Client with certain investment services or ancillary services, as defined in the Business Regulations and other related documents, only if the Client has given their relevant consent.

The Bank also informs the Client that in certain cases and for the use of certain services, it may request additional consents or consents with different content from the Client.

The Client acknowledges that the information in this Section 3 does not apply to the legal relationship between the Client and the Bank under the Global Markets Framework Agreement (if the Client has a Global Markets Framework Agreement).

The Bank currently asks for Client consent in the following matters:

## A/1 Providing information to the Client

If the Client expressly chooses, the Bank shall comply with its obligation to provide advance and other information as set out in the Business Regulations on paper (in writing) in the manner set out in the Business Regulations.

If the Client chooses, the Bank shall comply with its obligation to provide advance and other information as set out in the Business Regulations by publishing a notice on the website in the manner set out in the Business Regulations.

## A/2 Provision of information to the Client on costs and related charges

If the Client chooses, the Bank shall comply with its obligation to provide advance and other information on costs and related charges as set out in the Business Regulations on paper (in writing) in the manner set out in the Business Regulations.

If the Client chooses, the Bank shall comply with its obligation to provide advance and other information on costs and related charges as set out in the Business Regulations by publishing a notice on the website in the manner set out in the Business Regulations.

#### A/3 Provision of KIDs for packaged retail investment products

The Bank shall provide KIDs on paper to the Client with retail client categorisation in the manner set out in the Business Regulations, if the packaged retail investment product is offered *in person* and the Client with retail client categorisation does not provide otherwise, or if the Client with retail client categorisation has chosen not to receive the information on paper but requests the KID on paper.

If the Client so chooses, the Bank shall make the KID available to the Client with retail client categorisation via the website in the manner specified in the Business Regulations.

# A/4 Manner of provision and ex-post provision of the suitability report related to the investment advice provided

The Bank shall also send the suitability report related to the investment advice provided as set out in the Business Regulations to the Client with retail client categorisation on paper or by way of other durable media, based on the consent of the Client with retail client categorisation.

The Client with retail client categorisation acknowledges that, in the case of investment advice provided by means of telecommunication in the manner specified in the Business Regulations, the means of telecommunication used does not always allow the Bank to provide the suitability report to the Client with retail client categorisation prior to the conclusion of the contract or the placement of the order based on the investment advice. The Bank requests the consent of the Client with retail client categorisation for the Bank to provide the Client with retail client categorisation with the suitability report after the conclusion of the contract or after the order has been placed, if the given means of telecommunication does not allow for the prior delivery of the suitability report.

The Client with retail client categorisation gives their consent to the ex-post provision of the suitability report with the content and in the knowledge that

- a) they agree to receive the suitability report without undue delay after the conclusion of the contract with the Bank or the placement of the order, and
- b) they are entitled, at their option, to postpone the conclusion of the contract or the placement of the order with the Bank in order to receive the suitability report prior to the conclusion of the contract or the placement of the order.

# B/1 Consent to execution outside a trading venue

Based on such consent by the Client with retail client categorisation, the Bank is entitled to execute the Client's orders and transactions concluded in the context of own-account trading outside a trading venue, in accordance with the Bank's Execution and Allocation Policy.

The Bank informs the Client that they may only place an order or conclude a contract via the Internet (electronic channel) if they have chosen the website for the matters specified in Sections A/1 to A/3.

The Bank informs the Client with retail client categorisation that the possibility to receive investment advice via the Internet (electronic channel) is available only if the Client has chosen other durable medium for the matters specified in Section A/4.

If the information is provided in writing, the Bank publishes the printed document containing the information in accordance with the rules applicable to announcements or, upon request, provides it on paper to the Client.

# 4. LEI code and natural person identifiers

Sections A.II.2.8, A.II.2.9 and A.II.3.5 of the Business Regulations contain general provisions on the LEI code and the national client identifier for natural persons.

#### 4.1 LEI code

# 4.1.1 Definition of LEI code

The LEI code is a 20-character, alphanumeric, international identification code used to uniquely identify the parties involved in financial transactions.

# 4.1.2 LEI code application and renewal

It is the Client's obligation and responsibility to obtain and maintain the LEI code.

LEI codes can be obtained from the LEI code issuing service providers (Local Operating Unit or LOU). In Hungary, GS1 Zrt. (<a href="https://gs1hu.org/lei">https://gs1hu.org/lei</a>) is authorised to issue LEI codes. More information on the conditions, validity period and costs of obtaining LEI codes can be obtained from the relevant issuer, or from GS1 Zrt. in case of Hungarian applications, or is available on the Internet.

The LEI code applied for must be renewed annually, otherwise the LEI code becomes inactive.

The costs incurred in applying for or renewing the LEI code are borne by the Client.

### 4.1.3 LEI code acceptance criteria

The Client is entitled to use the investment service, ancillary service specified in Subsection A.II.2.8.1 of the Investment Services Business Regulations from the date on which the Client has communicated the LEI code to the Bank.

The Client shall provide the LEI code in writing at any OTP Branch.

The Client's LEI code may have different statuses according to the legislation in force.

The Bank will only accept LEI codes from the Client:

- a) that apply to the Client concerned,
- b) whose status is in accordance with the current regulatory requirements (currently 'issued', 'lapsed', 'pending transfer' or 'pending archival'),
- c) that is included in the global LEI database maintained by the central operating unit (GLEIF) appointed by the Regulatory Oversight Committee on Entity Identifiers.

# 4.2 Natural person identifiers

### 4.2.1 Generation of natural person identifiers

The natural person identifier is a combination of the ISO 3166-1 alpha-2 two-letter country code indicating the nationality of the natural person (hereinafter: "Country Code") and the national client identifier based on the nationality of the natural person.

The generation of the national client identifier and the scope of the data required for generation may vary depending on the nationality of the Client.

For Hungarian citizen Clients, the national client identifier is derived from the natural person Client's first and last name and date of birth.

The scope and source of the personal data required for the generation of the national client identifier of natural person Clients who are foreign nationals and the order of priority for the acceptance of such data are set out in Annex 1 to this Supplementary Announcement.

# 4.2.2 Client tasks in relation to the generation of national client identifiers

It is the Client's obligation and responsibility to provide the Bank with the up-to-date information necessary for the Bank to generate the national client identifier.

The Bank automatically generates the national client identifier for both domestic and foreign natural person Clients.

The data required for the generation of the national client identifier can be provided by the Client in person at any Branch, upon presentation of the original document containing the personal data. A Client with a Private Banking Master Agreement is entitled to provide the Adviser with data for the natural person identifier in writing.

In the case of natural person Clients with Hungarian citizenship, the Bank generates the national client identifier on the basis of the personal data provided during the Client identification process, therefore, Hungarian citizens have no further data reporting obligations beyond the data required for Client identification and the notification of changes.

In the case of foreign natural person Clients, proof of the personal data set out in Annex 1 to this Supplementary Announcement may be required by the presentation of the original official documents, which the Client may do in person at any Branch.

The foreign natural person Client shall provide the Bank with the data required for the generation of the national client identifier in accordance with the priority level set out in Annex 1.

If the natural person Client is a national of more than one EEA Member State, they shall provide the Bank with the data necessary to generate the national client identifier of the first nationality in the alphabetical order of the Country Codes set out in Annex 1, unless the first nationality in the alphabetical order of the Country Codes is Hungarian.

If the natural person Client holds both EEA and non-EEA citizenships, they are obliged to provide the Bank with the data necessary to generate the national client identifier for the EEA nationality.

The Client shall provide the Bank with the data required for the generation of the national client identifier in the manner specified in the Business Regulations and in this Supplementary Announcement and to notify the Bank of any changes thereto. If the information provided by the Client does not comply with the requirements set out in the Business Regulations and in this Supplementary Announcement and the Bank does not refuse to conclude the transaction by exercising its option provided for in the Business Regulations, the Client shall be fully liable and responsible to the Bank for the consequences of providing incorrect information, including any consequences arising from the obligation to report the transaction to be fulfilled or already fulfilled by the bank.

## 4.2.3 Natural person identifiers in case of representatives

The representatives as defined in Section A.II.3.5.2. of the Business Regulations are as follows:

- In the case of representatives of natural person Clients, the legal representatives (parent, guardian, custodian) and the ad hoc and permanent proxies.
- In the case of representatives of non-natural person Clients, the legal representatives, organisational representatives, ad hoc and permanent proxies.

Representatives as defined in this Section 4.2.3 are subject to the provisions of Sections 4.2.1 and 4.2.2.

#### 4.3 Transactions refused in the absence of a national client identifier and LEI code

The Bank shall not fulfill the placement or execution of orders if the LEI code of the non-natural person Client giving the order as defined in Section 4.1 or the data required for the generation of the national client identifier as defined in Section 4.2 are not available to the Bank and the orders relate to Financial Instruments subject to transaction reporting obligations.

The financial instruments subject to the obligation to report transactions, as defined in Sections A.II.2.8.1. and A.II.2.9.1. of the Business Regulations, are the following:

- a) financial instruments which are admitted to trading or traded on a trading venue or for which a request for admission to trading has been made;
- b) financial instruments where the underlying is a financial instrument traded on a trading venue; and
- c) financial instruments where the underlying is an index or a basket composed of financial instruments traded on a trading venue.

The obligation to report transactions shall apply to transactions in the referenced financial instruments irrespective of whether or not such transactions are carried out on the trading venue.

Whether a financial instrument is admitted to a trading venue, e.g. stock exchange, trading platform, etc. can be checked using the ISIN code of the financial instrument on the ESMA website:

https://registers.esma.europa.eu/publication/searchRegister?core=esma\_registers\_firds

A financial instrument may be admitted to trading at any time during its term. The fact that the instrument was not admitted to a trading venue when purchased, and therefore did not require a LEI code to buy, is no guarantee that this will not change during the term and that a LEI code will be required to sell.

Maturities of financial instruments and payments due are not subject to the obligation to report transactions, and as such no national client identifier or LEI code is required for these financial events.

### 5. Validity period of stock exchange orders and information on the price data service

Validity period for BSE orders - excluding orders placed through the OTP SingleMarket service channel:

- a) A **Market Price Order placed through any service channel** is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+359 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. The unexecuted part of the order remains in the order book at the last transaction price. Such orders may only be placed in the "Continuous Auction Model"
- b) Market price order placed through any service channel with Fill-or-Kill condition can only be given for 1 day and is only executed if there is a counter-offer for the full quantity and the transaction is concluded, otherwise the full bid is cancelled. Bids cannot be placed in the Continuous Auction and Auction models with Fill-or-Kill and Immediate-or-Cancel conditions.
- c) Market price order placed through any service channel with Immediate-or-Cancel condition can only be given for 1 day. If the order is executed at any price level (partial execution is also accepted), the quantity not executed is deleted from the order book. Bids cannot be placed in the Continuous Auction and Auction models with Fill-or-Kill and Immediate-or-Cancel conditions.
- d) A **Limit Price Order placed through any service channel** is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+359 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. If the Client does not specify a validity period when placing a stock exchange order through OTPdirekt Broker and OTP SmartBroker, the maximum validity period of the order is the order date. If the Client does not specify a validity period when placing a stock exchange order through OTPdirekt Internet, the maximum validity period of the order is 30 days.

## Validity period for BSE orders through the OTP SingleMarket service channel:

- a/ A Market Price Order is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+364 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. The unexecuted part of the order remains in the order book at the last transaction price.
- **b/** A **Limit Price Order** is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+364 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. If the Client does not specify a validity period when placing a stock exchange order through OTP Single Market, the maximum validity period of the order is the order date.

According to the General Terms of Service of the BSE, structured products, in particular certificates and warrants, may also be cancelled if their price deviates by at least 50% from the theoretical price determined by the Market Maker of the structured product in question. The cancellation of a stock exchange transaction may be initiated only by one or both of the Exchange Members involved in the transaction, provided that the request is received by the counterparty and the BSE within a maximum of 1 hour of the time of the transaction, but no later than 16:30 on the same day. The BSE's Chief Executive Officer shall decide on the result of the transaction

cancellation procedure by way of a resolution, and shall notify the Exchange Members concerned of the cancellation no later than by 17:30 on the relevant exchange day.

The Bank suspends the exchange transaction(s) concerned by the transaction cancellation procedure after becoming aware of the initiation of the cancellation procedure. During the period of suspension, the Client may not give the Bank any new orders or instructions for another transaction under the collateral of the future consideration (cash or securities) from the base transaction(s) concerned, as the Bank shall not accept any orders or instructions from the Client during the period of suspension. The suspension shall remain in force until the date of delivery to the Bank of the BSE's decision on the outcome of the transaction cancellation procedure or, in the case of cancellation of a stock exchange transaction, until the date of financial settlement resulting from the cancelled stock exchange transaction.

The Bank shall, in relation to the exchange transaction(s) affected by the transaction cancellation and the Chain Transaction Related to Transaction Cancellation concluded prior to the notification of the initiation of the transaction cancellation procedure, call upon the Client to provide the necessary financial collateral and consideration in order to execute and settle the transactions concerned.

In the event that the Client fails to perform, fails to perform in full or is late in performing any of their obligations relating to the payment of fees, collateral, margin calls, transfer of securities or other financial instruments, and, if the Client is unavailable to the Bank or fails to cooperate, the Bank shall be entitled to proceed in accordance with the provisions of the Business Regulations and its General Business Regulations and to apply the consequences of default and late performance in order to execute and settle the transactions.

The Bank may pass on to the Client the payment of costs, fees and the consideration for the work performed by the Bank in connection with the execution and settlement of the Chain Transaction(s) Related to Transaction Cancellation.

The Bank shall also charge the Client a buy-in fee if the Bank is obliged to perform in order to execute and settle the transaction(s) and therefore the acquisition of the security or financial instrument concerned becomes necessary.

The Client may not terminate their securities account, until the financial settlement, execution and clearing of the transaction(s) concerned by the transaction cancellation and the Chain Transactions Related to Transaction Cancellation have been completed.

If the market price of a certificate reaches the limit price or knock-out price (KO price) predetermined by the Issuer, the certificate expires immediately and its trading is suspended without delay. Ongoing commission agency orders expire at the end of the day on the day the KO price is reached, regardless of the original expiry date of the transaction. However, the BSE allows investors to sell the securities at the residual value determined by the Issuer – provided the Issuer has determined a residual value – on the second trading day following the knock-out date as part of "residual value trading". The BSE does not limit "residual value trading", thus it is the responsibility of investors to place sell bids only at the specified residual value during this period, as the trading system accepts both sell and buy bids that differ from the residual value and, if a transaction is concluded, the investor is obliged to fulfil it. If the investor has not sold their security during the residual value trading period or no residual value trading period has been determined for the security, the certificate is settled as described in Section 6 of this Supplementary Announcement. The Bank does not accept securities blocking orders for certificates.

# Rules governing the various BSE transactions of Clients registered for the OTPdirekt Broker and OTP SmartBroker as well as OTP SingleMarket services:

- a) In the case of Clients registered for OTP SingleMarket, it is possible to place STOP market price, STOP limit price orders. It is not possible to place day-trade orders through the OTP SingleMarket service.
- b) In the case of Clients registered for the OTPdirekt Broker and OTPdirekt SmartBroker services, it is possible to place STOP market price, STOP limit price and day-trade orders.
- c) Concurrently with marking a limit price or market price offer STOP, the Client must also provide an activation price. A STOP limit or STOP market offer is a conditional offer that is only entered in the Order Book if a transaction is concluded on the market at the activation price specified in the offer or at a better price than the activation price according to the BSE regulations, subject to the exceptions specified in the BSE Regulations. At the moment of the trade, the Stop limit offer and the Stop market offer, which are not yet in the order book, are automatically entered in the order book as a limit price offer and a market price offer, respectively (in the Continuous trading with opening and closing auction model with Immediate-or-

- Cancel bidding condition, in the Multiple auction and Continuous auction model without bidding condition), and the order will behave as a limit price offer and a market price offer, respectively, according to the Stock Exchange's rules. The maximum validity of a STOP market price order is 360 calendar days.
- d) **Day-trade transaction:** Trades executed within the exchange day, i.e. sales of securities for the same amount against the securities included in a buy order executed on T-day with settlement on T-day, or purchases of securities for the same security and the same amount against the money included in a sell order executed on T-day with settlement on T-day, provided that the validity period of the buy and sell order is the same. The maximum validity period for buy and sell orders is one day. In the case of day-trade orders, the Bank subsequently waives the fee for the buy order. Day-trade settlement is only possible for BSE stock exchange orders.

# The validity period of orders placed on the electronic trading platform (XETRA) of Deutsche Börse A.G.:

- a) The maximum validity period of a **Limit Price Order placed through any service channel**\* is 30 calendar days from the day on which the order was placed, within which period it is valid until executed or withdrawn.
- b) A **Market Price Order placed through any service channel**\* is only transmitted to the exchange during the free trading phase of exchange trading, not during the auction call phase or the opening and closing phases of exchange trading. The maximum validity period of a market price order is the day the order is placed, thus a market price order can be executed at any time during the day at the current market price. At the end of the day, unexecuted orders and the unexecuted part of the partially executed orders are automatically removed from the order book.

# The validity period of orders placed on the Deutsche Börse A.G. electronic trading market (Xetra) through the OTP SingleMarket service channel:

- c/ A Market Price Order is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+364 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. The unexecuted part of the order remains in the order book at the last transaction price.
- d/ A Limit Price Order is valid until withdrawn or, in the case of the determination of the validity period, until the expiry of M+364 calendar days from the day on which the order was placed (M-day), within which period it is valid until executed or withdrawn. If the Client does not specify a validity period when placing a stock exchange order through OTP Single Market, the maximum validity period of the order is the order date.

Information on the price data service:

OTP Bank distribution channels	Price data of securities traded on the BSE	Price data for securities traded on the electronic trading platform (XETRA) of Deutsche Börse A.G.
Bank branch, OTPdirekt telephone banking, OTPdirekt Internet and OTPdirekt SmartBroker functions available without identification and with home bank contract	price data with a delay of 15 minutes	not available
OTPdirekt Broker and OTP SmartBroker functions available with identification	real-time price data	price data with a delay of 15 minutes
OTP SingleMarket service	- available without subscription: price data with a delay of 15 minutes  - real-time exchange rate data* available with a subscription purchased within the service	- available without subscription: price data with a delay of 15 minutes  - real-time exchange rate data** available with a subscription purchased within the service

<sup>\*</sup> In respect of the Deutsche Börse A.G. electronic trading platform (XETRA), private individual clients can place orders via OTPdirekt Broker and OTPdirekt Smartbroker, while Clients with private banking agreements via OTPdirekt Broker, OTPdirekt Smartbroker and the OTPdirekt telephone banking service, and in bank branches.

\*Through the OTP SingleMarket service, the Bank makes BSE real-time prices available free of charge on a promotional basis

\*\* Subscription to Deutsche Börse real-time prices via OTP SingleMarket will be available from July 2025

Procedure for handling commission agency transactions on the Deutsche Börse A.G. electronic

trading market (Xetra):

liauling illaik	ot (Actiu).	At book business	and de Alexandre			
Period	Transaction		and via the OTPdirekt banking service	Via the OTPdirekt Broker and OTP SmartBroker	services	
Period	Transaction	Limit price transactions	Market price transactions	Limit price transactions*	Market price transactions	
Period between branch opening	recording	<del>not</del>	<del>available</del>	The Bank accepts orders, and we forward them to the trading system after 8:35	not available	
and the start of	modification	<del>not</del>	available	Orders that have not yet been transmitted to the trading	not available	
trading hours (7:45-8:35)	withdrawal	<del>not</del>	<del>available</del>	system may be withdrawn/modified.	not available	
Auction call and opening price generation	recording	<del>not</del>	<del>available</del>	After the opening of the order book (8:35), the Bank transmits previously accepted orders and continues to accept and transmit new orders to the trading system.		
phase after the	modification	not available		Orders that have been accepted by the trading system but n	ot yet or partially	
start of trading hours (8:35-9:02)	hours withdrawal		<del>available</del>	executed can be modified/withdrawn.		
Stock exchange	recording	not	available	The Bank continuously accepts and transmits orders to the t	rading system.	
free trading phase (9:02-	modification	not	available	Orders that have been accepted by the trading system but n executed can be modified/withdrawn.	ot yet or partially	
17:30)	withdrawal	<del>not</del>	available	CACCURCA CALL DO MICAMICA, MARIATA		
Closing auction	recording	not	available	The Bank continuously accepts and transmits orders to the t	rading system.	
(17:30-17:35)	modification	<del>not</del>	available	Orders that have been accepted by the trading system but	t not yet or partially	
	withdrawal	<del>not</del>	available	executed can be modified/withdrawn.		
	recording	<del>not</del>	available	We accept it and forward it to the trading system.		
Trade-at-Close (17:35-17:45)	modification	not	available	Orders that have been accepted by the trading system but n	ot yet or partially	
withdrawal		not	available	executed can be modified/withdrawn.		
Between branch closure and	recording	not	available	The Bank accepts orders with validity for the following trading day.		
branch opening	modification	not	<del>available</del>	Orders that have not yet been transmitted to the trading	not available	
(17:45-7:45)	withdrawal	not	available	system may be modified/withdrawn. not ava		

<sup>\*</sup>The modification and withdrawal of an order is only possible in the branch or via the transaction channel in which the order was originally recorded.

# Procedure for handling commission agency transactions on the Deutsche Börse A.G. electronic trading market (Xetra) via the OTP SingleMarket service:

		Via the OTP SingleMarket s	ervice	
Period	Transaction	The Bank accepts orders with validity for the following trading day and transfers them to the trading system after 8:50 a.m. on the next trading day.  Orders that have not yet been transmitted to the trading system may be withdrawn.  After the opening of the order book (8:50), the Bank transmits previously accepted orders and continues to accept and transmit new orders to the trading system that have not yet been or have been partially executed may be cancelled.	Market price transactions	
Period between closing and opening of the Stock Exchange	recording	following trading day and transfers them to the trading system after 8:50 a.m. on the next	not available	
(17:30-8:50)	withdrawal		not available	
Auction call and opening price generation phase after the start of trading	recording	Bank transmits previously accepted orders and continues to accept and transmit new	not available	
hours (8:50-9:00)	withdrawal	Orders accepted by the trading system that have not yet been executed or have been partially executed may be cancelled.		
Stock exchange free trading phase (9:00-17:30)	recording	The Bank continuously accepts and transmits orders to the trading system.		

Orders accepted by the trading system that have not yet been executed or have been partially executed may be cancelled.

#### withdrawal

# 6. Tick size set by the Budapest Stock Exchange

The BSE determines the tick size for equities, ETFs (exchange-traded funds) and deposit certificates based on a two-dimensional set of criteria (price, liquidity category), as shown in the following table:

	Liquidity bands					
Price ranges	0 ≤ Average daily number of transactions < 10	10 ≤ Average daily number of transactions < 80	80 ≤ Average daily number of transactions < 600	600 ≤ Average daily number of transactions < 2000	2000 ≤ Average daily number of transactions < 9000	9000 ≤ Average daily number of transactions
0 ≤ price < 0.1	0.0005	0.0002	0.0001	0.0001	0.0001	0.0001
0.1 ≤ price < 0.2	0.001	0.0005	0.0002	0.0001	0.0001	0.0001
0.2 ≤ price < 0.5	0.002	0.001	0.0005	0.0002	0.0001	0.0001
0.5 ≤ price < 1	0.005	0.002	0.001	0.0005	0.0002	0.0001
1 ≤ price < 2	0.01	0.005	0.002	0.001	0.0005	0.0002
2 ≤ price < 5	0.02	0.01	0.005	0.002	0.001	0.0005
5 ≤ price < 10	0.05	0.02	0.01	0.005	0.002	0.001
10 ≤ price < 20	0.1	0.05	0.02	0.01	0.005	0.002
20 ≤ price < 50	0.2	0.1	0.05	0.02	0.01	0.005
50 ≤ price < 100	0.5	0.2	0.1	0.05	0.02	0.01
100 ≤ price < 200	1	0.5	0.2	0.1	0.05	0.02
200 ≤ price < 500	2	1	0.5	0.2	0.1	0.05
500 ≤ price < 1000	5	2	1	0.5	0.2	0.1
1000 ≤ price < 2000	10	5	2	1	0.5	0.2
2000 ≤ price < 5000	20	10	5	2	1	0.5
5000 ≤ price < 10000	50	20	10	5	2	1
10000 ≤ price < 20000	100	50	20	10	5	2
20000 ≤ price < 50000	200	100	50	20	10	5
50000 ≤ price	500	200	100	50	20	10

The current liquidation category classifications for the specific equities, compensation notes and ETFs tradable on the BSE are set out in Resolution No. 550/2013 of the CEO of the BSE, as amended several times (www.bet.hu).

The liquidity category is the average daily number of transactions of a given product in the market relevant for liquidity, determined once a year by the competent authority for the given market. In this context, the BSE reviews the tick sizes for the product categories concerned on an annual basis.

In the event that the BSE modifies the applicable tick sizes for the various financial instruments and this modification affects the Client's submitted but not yet executed order, the Bank shall cancel the relevant order, if not yet executed yet, as an offer recorded in the BSE's order book and in this case the Client's order shall be subject to the cancellation rules.

## 7. Scope and rate of collateral acceptable for the marketing of securities

For orders to buy securities

<u>. 0. 0. ac</u>	no to buy occurring				
Transaction		Balance of available funds in a payment account linked to a securities account	Balance of available funds on a securities account	Free-float government securities registered in a securities account and maturing by the financial settlement date of the auction*****	Free-float fund units registered in a securities account with T-day settlement, in the same currency as the distribution currency of the transaction***
and e	Government securities auction *	✓	✓	-	-
ay b les	OTC auction (BSE)	4-	<b>√-</b>	-	-
ar mg an ch seleph Subscri	Subscription ****	✓	✓	-	-
를 수 를 함 S	Tap issue	✓	✓	-	-
sactions via bank OTPdirel banking	BSE stock exchange purchase of securities**	<b>√</b> -	<b>√</b> -	-	<b>✓-</b>
	Purchase of OTP fund units and government securities	✓	✓	-	-
Tran placed the (	Purchase of foreign and domestic non-OTP fund units	✓	✓	-	✓

Transactions that may be placed via OTPdirekt Internet	Subscription****	✓	✓	-	-
	Tap issue	✓	✓	-	
	BSE stock exchange purchase of securities**	✓	✓	-	✓
Trans pla	Purchase of OTP fund units and government securities	✓	✓	-	-
/ be	Subscription****	✓	✓	-	-
ma) direk	Tap issue	✓	✓	-	
ons that via OTP Broker	BSE stock exchange purchase of securities**	✓	✓	-	✓
Transactions that may be placed via OTPdirekt Broker	Purchase of securities on the Deutsche Börse A.G. electronic trading market (Xetra)**	✓	✓	-	-
Tran	Purchase of OTP fund units and government securities	✓	✓	-	-
OTP Internet and MobileBank	Subscription****	<b>√</b>	<b>√</b>	-	-
net and Mc	Tap issue	<b>√</b>	✓	-	
OTP Interr	OTP fund unit purchase	<b>√</b>	<b>√</b>	-	-
kt ons via ker	BSE stock exchange purchase of securities**	✓	✓	-	-
OTPdirekt Transactions available via SmartBroker	Purchase of securities on the Deutsche Börse A.G. electronic trading market (Xetra)**	<b>√</b>	<b>√</b>	-	-
Transactions available through OTP SingleMarket	BSE stock exchange purchase of securities**	<b>~</b>	<b>√</b>	-	-
Transactior throug Singlel	Purchase of securities on the Deutsche Börse A.G. electronic trading market (Xetra)**	<b>√</b>	<b>√</b>	-	-

<sup>\*</sup>Only Clients with a Global Markets Framework Agreement and/or a Prestige Private Banking Master Agreement (Private Banking contract and within it a Prestige Private Banking Service Package) may place a government securities auction order through the transaction channel provided to them.

In the case of a Market-type buy order, the collateral to be provided is the value of the last known stock exchange price prior to the date of placing the order plus a safety multiplier (+10%), plus the amount of the commission, fees and costs payable to the Bank.

In the case of a Market-type buy order recorded using the OTP SingleMarket service: the collateral to be provided is calculated and booked by the Bank on the basis of the liquidity category of the financial instrument subject to the order, as determined by the trading venue of the financial instrument concerned, and the last known stock exchange price prior to the date of placing the order, increased by a safety multiplier and the amount of commission, fees and costs payable to the Bank. The maximum safety multiplier is +10%. The exact level of the security multiplier applied per liquidity category can be found within the OTP SingleMarket platform.

In the case of a Limit type buy order, the collateral to be provided is the cash consideration of the purchase price calculated at the limit price and the amount of the commission, fees, charges payable to the Bank.

\*\*\*\*\*Using the OTPdirekt telephone banking, OTPdirekt Internet, OTPdirekt Broker, OTP Internet and Mobilebank services, subscription orders can be placed if the marketing documents of the financial instrument allow.

In all cases, the collateral must be provided in accordance with the currently effective Investment Services Business Regulations and only securities which the Bank quotes or, in the case of a fund unit, it has a net asset value on the date of the transaction, may be included as collateral. The Bank may, at its own discretion, also accept as collateral for a future purchase order a monetary claim arising from the sale of a security that has not

<sup>\*\*\*</sup> After the introduction of the additional commission, only OTP Optima Capital Guaranteed Bond Fund (OTP Optima Tőkegarantált Kötvény Alap) units with a stock acquisition date earlier than the earliest securities settlement date of the commission agency purchase transaction minus 7 calendar days may be included as collateral behind the purchase transactions.

<sup>\*\*\*\*\*</sup> For orders to buy securities, free-float government securities registered in a securities account and maturing by the financial settlement date of the auction may not be used as collateral as of 16 December 2013.

yet been credited to the Customer's Payment Account or Foreign Exchange Account, but is due and expected to be credited on a future value date (future value date monetary claim), provided that a monetary claim is expected to be credited to the Client's Payment Account, Foreign Exchange Account by the settlement date of the purchase price of the security in accordance with the rules of the relevant clearing house.

Within the scope of eligible collaterals, the Client may decide, by agreement with the Bank, which type of collateral from among the freely disposable financial assets held in their Consolidated Securities Account and/or Payment Account they wish to use in the given transaction.

Mixed collateral, i.e. a combination of collateral types, is possible as follows.

The order in which collateral is used in the case of mixed collateral is as follows:

- 1) Balance of available funds on the Consolidated Securities Account
- 2) Balance of available funds in the Payment Account
- 3) T-day fund unit

Use among the same type of securities is in alphabetical order of the names of the securities.

In the case of multiple entries within a given security, the order of stock matching is based on the FIFO principle.

In the case of an **order to sell a security**, the only eligible collateral for a sell order placed through any service channel is the Client's free float securities registered in the Client's Consolidated Securities Account. The Bank may, at its own discretion, accept future securities (future value date securities receivable), which have not yet been credited, but in a known amount, as collateral for a stock market sell order, provided that the future securities are expected to be credited to the Customer's Consolidated Securities Account by the settlement date under the relevant clearing house's rules.

Information on the scope of securities that can be accepted **as collateral for a collateral loan** and their acceptance price is available from the bank branches involved in securities distribution.

The order is executed if the Bank has the necessary consideration at its disposal at the time the processing of the order is started. In the event that, at the start of the processing of the order, the consideration required for the execution of the order is not available, the order fails and the Bank is not obliged to make partial execution. If the Client's intention to continue investing in respect of the failed transaction persists, in this case the order must be reissued, with the consideration as collateral.

## 8. Minimum amounts used in securities distribution

Transaction	Minimum amount
Government securities auction order	At HUF 10,000,000 face value
OTC auction (BSE)	Determined as per the documentation of the placement (e.g. Prospectus, Announcement).
HUF-denominated bonds issued by OTP	At HUF 10,000 face value
Subscription of EUR-denominated bonds issued by OTP	At EUR 1,000 face value
Subscription of USD-denominated bonds issued by OTP	At USD 1,000 face value
Subscription of OTP Investment Fund	Contained in the Prospectus and the Management Policy (currently at HUF 50,000 face value for HUF-denominated funds, different for FX-denominated funds, the Prospectus and the Management Policy prevail)
Redemption of Premium EURO Hungarian Government Bonds	At EUR 100 face value
Purchase of OTC government securities from OTP own account	At HUF 100,000 face value
Purchase of units issued by foreign investment fund managers (BlackRock, BNP, Schroders, Templeton, PIMCO, Fidelity, J.P. Morgan) (except for units denominated in HUF issued by BlackRock, BNP and Templeton, Fidelity, J.P. Morgan, for which no minimum purchase amount is specified)	At EUR 1,000 or USD 1,000 or JPY 100,000 price

Purchase of units issued in HUF of domestic funds not managed by OTP Fund Management (Accorde HOLD* and VIG**)	no minimum quantity
Purchase of units issued in foreign currency of domestic funds not managed by OTP Fund Management (Accorde HOLD* and VIG**)	At EUR/USD 1,000 price
Purchase of foreign equities and ETFs distributed on the Deutsche Börse A.G. electronic trading market (Xetra)	At EUR 1,000 price
Standing purchase order for HUF-denominated units of OTP Funds	At HUF 10,000 price
Standing purchase order for FX-denominated units of OTP Funds	At EUR 50 or USD price
Purchase, redemption orders for OTP Tőkegarantált Rövid Kötvény Alap (OTP Capital Guaranteed Short Bond Fund) and OTP Prémium Pénzpiaci Alap (OTP Premium Money Market Fund) units via OTP Direkt Internet, OTP Direkt Broker, OTP Internet and Mobilebank services	At HUF 10,000 price
Buy orders for OTP Tőkegarantált Rövid Kötvény Alap*** (OTP Capital Guaranteed Short Bond Fund), OTP Premium Money Market Fund (OTP Prémium Pénzpiaci Alap) and OTP Optima Tőkegarantált Alap (OTP Optima Capital Guaranteed Fund) placed at a bank branch or via the OTPdirekt telephone banking service	At HUF 100,000 price
For orders to buy units of OTP Euró Ingatlanpiaci Alapok Alapja (Fund investing in OTP Euro Real Estate Fund) and OTP Dollár Ingatlanpiaci Alapok Alapja (Fund investing in OTP Dollar Real Estate Fund)	At EUR / USD 1,000 price
For orders to buy units of OTP PRIME Ingatlanbefektetési Alap (OTP PRIME Real Estate Investment Fund)	At HUF 10,000,000 price
For orders to buy units of Fund investing in OTP PRIME Euró Ingatlanpiaci Alapok Alapja (Fund investing in OTP PRIME Euro Real Estate Fund)	At EUR 35,000 price
Buy orders for units of OTP EMDA Euró Származtatott Alapba Fektető Alap (Fund investing in OTP EMDA Euro Fund), OTP Spectra Származtatott Alapba Fektető Alap (Fund investing in OTP Spectra Fund), OTP Multi-Asset Konzervatív Alapok Alapja (OTP Multi-Asset Conservative Fund of Funds), OTP Multi-Asset Kiegyensúlyozott Alapok Alapja (OTP Multi-Asset Balanced Fund of Funds), OTP Multi-Asset Dinamikus Alapok Alapja (OTP Multi-Asset Dynamic Fund of Funds), OTP Terra Árupiaci Alap (OTP Terra Commodity Market Fund) Series "A" and "B", OTP Közép-Európai Származtatott Részvény Alap (OTP Central European Equity Fund) Series "B"	At HUF 50,000 / EUR 200 price
Buy order for units of OTP CETOP Indexkövető UCITS ETF Alap (OTP CETOP Index Tracking UCITS ETF Fund) in the context of continuous distribution, in the case of a purchase for cash in the currency of the Fund, the first purchase order	At EUR 95,000 ****
When placing a buy order for units of the OTP CETOP Indexkövető UCITS ETF Alap (OTP CETOP Index Tracking UCITS ETF Fund) in continuous distribution, when the units are purchased from the underlying CETOP NTR Index and the cash covering the rounding difference, the minimum buy order amount is	50.000 investment units****

<sup>\*</sup>The name of Concorde Alapkezelő Zrt. was changed to HOLD Alapkezelő Zrt. as of 11 September 2017.

#### 9. Distribution limits applied to the distribution of securities

Pursuant to Section 43.1 of the current Prospectus and Management Regulations of the OTP Real Estate Investment Fund, a maximum distribution limit (upper limit) has been set for Series A units of the OTP Real Estate Investment Fund, which is 183,700,000,000 units as of 12 August 2021.

In accordance with point 43.1 of the current Prospectus and Management Regulations of the OTP PRIME Real Estate Investment Fund, a maximum distribution limit (upper limit) has been set for the "A" series units of the OTP PRIME Real Estate Investment Fund, which is the number of units in circulation at 17.00 on 15 May 2019. In the event that the volume of units in circulation as defined above reaches the maximum distribution limit defined in the Management Regulations, the placing of the units in question on the market (purchase order) will be suspended in accordance with Article 110 (1) of Act XVI of 2014 (hereinafter: Kbftv.).

Subject to the provisions of Article 110 (2) of the Kbftv, according to Section 43.2 of the Management Regulations, the units will not be placed on the market again until the volume of units of the given series in circulation reaches the maximum volume of the established maximum distribution volume reduced by a maximum of 2%.

<sup>\*\*</sup> From 15 May 2023, Aegon Hungary Investment Fund Management Company Ltd. operates under the name VIG Asset Management Hungary Company

<sup>\*\*\*</sup> The name of the OTP Tőkegarantált Pénzpiaci Alap (OTP Capital Guaranteed Money Market Fund) was changed to OTP Tőkegarantált Rövid Kötvény Alap (OTP Capital Guaranteed Short Bond Fund) as of 21 January 2019.

\*\*\*\*The minimum values set out in the table capit to the capital state of the capital state of the capital state.

<sup>\*\*\*\*</sup>The minimum values set out in the table apply only to the continuous distribution of units of the OTP CETOP Indexkövető UCITS ETF Alap (OTP CETOP Index Tracking UCITS ETF Fund). No minimum amount or minimum quantity has been set for the trading of units on the stock exchange. The units of the OTP CETOP Indexkövető UCITS ETF Alap (OTP CETOP Index Tracking UCITS ETF Fund) may only be continuous distributed on the OTP Bank Plc. 14, Madarász Viktor u.1131 Budapest (Central Branch).

OTP Real Estate Investment Fund Management Ltd. will immediately provide information on its own website and on the website of OTP Bank Plc. about the reaching of the distribution limit, the suspension or resumption of the purchase of units as described above.

From January 20, 2025, OTP Bank Plc. commits to purchasing up to HUF 50 million nominal value daily from the Premium Hungarian Government Bond series, per series and per investor.

#### 10. Execution and settlement rules of securities

The Bank carries out the settlement of securities on T-day and T+X days as part of continuous distribution, subject to the following principles:

T-day (for OTC securities) = Order Date, i.e. the day on which the order to buy or sell OTC securities (openend fund units, OTC government securities, etc.) is recorded. For securities with T-day settlement (where T+X days = T-day), ownership of the security is transferred to the new owner on the same day, meaning that on T-day the Client already physically holds the amount of securities or money in the order. For securities with T+X days settlement, ownership of the security is not yet transferred to the new owner on T-day, meaning that on this day the Client does not yet physically or legally hold the amount of securities or money in the order, not including the case where the Customer wishes to secure a cash claim or a securities claim with a future value date as collateral for an Individual Transaction and the Bank, at its sole discretion, accepts the cash claim or securities claim with a future value date as collateral in accordance with the Rules.

**T-day (for exchange-traded securities) = Execution Date**, i.e. the day on which the order to buy or sell the security on the stock exchange is executed.

In the case of securities traded on the BSE, on this day the Client does not yet physically hold the amount of securities or money specified in the order, i.e. they are not yet credited to their account, but they can place a so-called value date order using the securities or money to be credited as collateral.

In the case of foreign stock exchange orders, the Bank accepts only the securities and cash balance resulting from executed orders physically settled by the foreign counterparty towards the Bank as collateral for a new order and only on the basis of an individual discretionary assessment, thus the Client cannot place a so-called value date order within the settlement period.

**T+X days (for listed and OTC securities) = Settlement Date**, i.e. the date on which the securities account is credited with the purchased securities or debited with the sold securities and the date on which the securities account and/or the linked payment account is debited with the consideration for the purchased securities or credited with the consideration for the sold securities. On this day, the Client already physically holds the amount of securities or money in the order. Only the trading days of securities are included in the T+X day settlement. Trading day means any banking day during the term of the security, excluding the period of suspension of distribution and the period of suspension of the distributor receiving clients.

Distribution	Settlement	Security	Order Date / Execution Date	Market price day	Settlement date
OTC secondary distribution**	T-day	1-Year Hungarian Government Security*, Premium Hungarian Government Security*, Bonus Hungarian Government Security*, Hungarian Government Security Plus*, Fixed Hungarian Government Security, Euro Hungarian Government Security, Discount Treasury Bill*, Hungarian Government Bond*, OTP-issued bonds	T-day	T-day	T-day
	T-day		T-day	T-day	T-day
Distribution of OTP fund units	T+3 days (Investment funds managed by OTP Alapkezelő Zrt.)	The following – currently effective – documents specify indicate the number of days of settlement for each OTP fund unit:  • Announcement on the product characteristics	T-day	T+1 day	T+3 days
	T+3 days (Investment funds managed by OTP Ingatlan Befektetési Alapkezelő Zrt.)	of investment funds available for regular and premium clients  the Prospectus and Management Policy of the various investment funds	T-day	T+3 days	T+3 days

	T+4 days (Investment funds managed by OTP Alapkezelő Zrt.)		T-day	T+2 days	T+4 days
	T+4 days (Series of investment funds managed by OTP Ingatlan Befektetési Alapkezelő Zrt.)		T-day	T+4 days	T+4 days
	T+130 days (Investment funds managed by OTP Ingatlan Befektetési Alapkezelő Zrt.)		T-day	T+130 days	T+130 days
Distribution of domestic, non-OTP fund units	T+2 days	Purchase and redemption of the following HUF-denominated units of funds managed by VIG Alapkezelő: VIG Alfa Abszolút Hozamú Befektetési Alap "A" sorozat (VIG Alpha Absolute Return Investment Fund Series "A"), VIG Magyar Kötvény Befektetési Alap (VIG Hungarian Bond Investment Fund), VIG MoneyMaxx Total Return Befektetési Alap "A" sorozat (VIG MoneyMaxx Total Return Investment Fund series "A"). Purchase and redemption of the following HUF-denominated units of funds managed by VIG Alapkezelő: VIG BondMaxx Total Return Kötvény Befektetési Alap (VIG BondMaxx Absolute Return Bond Investment Fund, Series "A", "E" and "U"), VIG Feltörekvő Európa Kötvény Befektetési Alap (VIG Emerging Market ESG Equity Fund, Series "A"), VIG Feltörekvő Piaci ESG Részvény Befektetési Alap (VIG Emerging Market ESG Equity Investment Fund, Series "A"), VIG Közép-Európai Részvény Befektetési Alap (VIG Central European Equity Fund, Series "A"), VIG Maraton ESG Absolut return Investment Fund, Series "A"), VIG MegaTrend Részvény Befektetési Alap (VIG Marathon ESG Absolut return Investment Fund, Series "A"), VIG MegaTrend Részvény Befektetési Alapok Alapja (VIG MegaTrend Equity Investment Fund of Funds, series "B"), VIG Fejlett Piaci Államkötvény Befektetési Alap (VIG Developed Market Government Bond Investment Fund, Series "A"), VIG Opportunity Fejlett Piaci Részvény Befektetési Alap (VIG Panorama Absolut Return Fund, Series "A"), VIG Panorama Absolut Return Fund, Series "A"), Aegon Russia Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Smart Money Investment Fund of Funds), VIG Lengyel Részvény Befektetési Alap ("B" sorozat) (VIG Polish Equity Market Fund, Series "B").	T-day (until the cut-off time)	T-day	T+2 days

		VIG Alfa Abszolút Hozamú Befektetési Alap (VIG Alfa Absolute Return Investment Fund, Series "E" and "U"), VIG Feltörekvő Európa Kötvény Befektetési Alap (VIG Emerging Market ESG Equity Fund, Series "A" and "U"), VIG Feltörekvő Piaci ESG Részvény Befektetési Alap (VIG Emerging Market ESG Equity Investment Fund, Series "B" and "U"), VIG Közép-Európai Részvény Befektetési Alap (VIG Central European Equity Fund, Series "B" and "U"), VIG Közép-Európai Részvény Befektetési Alap (VIG Marathon ESG Abszolút Hozamú Befektetési Alap (VIG Marathon ESG Abszolút Hozamú Befektetési Alap (VIG Marathon ESG Absolut Return Investment Fund, Series "E" and "U"), VIG MegaTrend Részvény Befektetési Alapok Alapja (VIG MegaTrend Requity Investment Fund of Funds, Series "A" and "U"), VIG MoneyMaxx Total Return Befektetési Alap (VIG Opportunity Developed Market Equity Fund, Series "B"), VIG Panorama Absolut Return Fund, Series "E" and "U"), Purchase and redemption of the following HUF-denominated units of funds managed by HOLD Alapkezelő: Citadella Abszolút Hozamú Származtatott Befektetési Alap (Citadel Absolute Return Derivative Fund, Series "A"), HOLD 2000 Open-end Investment Fund, Series "A"), HOLD Columbus Globális Értékalapú Abszolút Hozamú Származtatott Befektetési Alap (HOLD Sond Investment Fund, Series "A"), HOLD Rówchyn Befektetési Alap (HOLD Sond Investment Fund), HOLD MA Abszolút Hozamú Származtatott Befektetési Alap (HOLD Sond Investment Fund), HOLD WA Abszolút Hozamú Származtatott Befektetési Alap (HOLD Sond Fektetési Alap (HOLD Sond Sarias "A"), HOLD Rówchy Befektetési Alap (HOLD Sond Sarias "A"), HOLD Salakis Absolute Return Derivative Investment Fund, Series "A"), HOLD Galaxis Absolute Return Fund of Funds, HOLD Sond Nyiltvégű Vegyes Ér			
_	T+3 days	units of the funds managed by Accorde Alapkezelő: Accorde Prizma Abszolút Hozamú Alap (Accorde Prism Absolute Return Fund, Series "A" and "B"). Purchase and redemption of the following FX- denominated units of funds managed by VIG Alapkezelő: VIG Fejlett Piaci Rövid Kötvény Befektetési Alap (VIG	T-day (until the	T-day	T+3 days
	1 To days	Developed Market Short Term Bond Investment Fund, Series "E" and "U").	cut-off time)	i -uay	,
					26

		Redemption of the following HUF and FX-denominated units of the funds managed by VIG Alapkezelő: VIG Alfa Abszolút Hozamú Befektetési Alap (VIG Alfa Absolute Return Investment Fund, Series "E" and "U"), VIG Magyar Kötvény Befektetési Alap (VIG Hungarian Bond Investment Fund), VIG BondMaxx Total Return Kötvény Befektetési Alap (VIG BondMaxx Absolute Return Bond Investment Fund, Series "A", "E" and "U"), VIG Feltörekvő Európa Kötvény Befektetési Alap (VIG Emerging Market ESG Equity Fund, Series "A", "B" and "U"), VIG Feltörekvő Piaci ESG Részvény Befektetési Alap (VIG Emerging Market ESG Equity Investment Fund, Series "A", "B" and "U"), VIG Közép-Európai Részvény Befektetési Alap (VIG Central European Equity Fund, Series "A" and "B"), VIG Maraton ESG Abszolút Hozamú Befektetési Alap (VIG Marathon ESG Absolut Return Investment Fund, Series "A", "E" and "U"), VIG MegaTrend Részvény Befektetési Alapok Alapja (VIG MegaTrend Equity Investment Fund of Funds, Series "A", "B" and "U"), VIG MoneyMaxx Total Return Befektetési Alap (VIG MoneyMaxx Total Return Investment Fund, Series "A", "E" and "U"), VIG Fejlett Piaci Államkötvény Befektetési Alap (VIG Developed Market Government Bond Investment Fund, Series "A", VIG Opportunity Fejlett Piaci Részvény Befektetési Alap (VIG Opportunity Fejlett Piaci Részvény Befektetési Alap (VIG Opportunity Fejlett Piaci Részvény Befektetési Alap (VIG Panorama Absolut Return Fund, Series "A", "E" and "U"), Aegon Russia Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Smart Money Investment Fund of Funds). VIG Panorama Absolut Return Fund) Series "A", "E" and "U", Aegon Russia Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befektetési Alap (Aegon Russia Equity Fund), VIG Lengyel Részvény Befekte			
	T+5 days	Redemption of the following HUF and FX-denominated units of the funds managed by Accorde Alapkezelő: Accorde Első Román Részvényalap (Accorde First Romanian Equity Fund, Series "A" and "B").	T-day (until the cut-off time)	T-day	T+5 days
Distribution of foreign	T+3 days	Blackrock, Schroders, Templeton, PIMCO, Fidelity, J.P. Morgan and certain BNP funds registered in Hungary and distributed by the Bank.	T-day (until the cut-off time)	T-day	T+3 days
fund units	T+4 days	Certain BNP funds registered in Hungary and distributed by the Bank**.	T-day (until the cut-off time)	T+1 day	T+4 days
		Debt securities (government securities, corporate bonds, mortgage bonds) traded on BSE in the Debt Securities Section	T-day	T-day**	T+2 days
Stock exchange	T+2 days	Equities (shares and compensation notes) and other legal instruments (structured products, ETFs, fund units and certificates) traded on BSE in the Equities Section	T-day	T-day	T+2 days
distribution		Order placed on a foreign stock exchange (excluding orders for securities traded on US and Canadian foreign exchanges) ***	T-day	T-day	T+2 days
	T+1 day	Orders for securities traded on US and Canadian foreign exchanges ***	T-day	T-day	T+1 day
Car gayarnmant a	courities dependented in	LIJE or EUD issued by the AKK redemption orders conne	4 14 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4		

<sup>\*</sup>For government securities denominated in HUF or EUR issued by the ÁKK, redemption orders cannot be recorded on the working day preceding the interest payment.

In case of the redemption (with advance payment) of open-end units issued by funds managed by OTP Alapkezelő Zrt. and OTP Ingatlan Befektetési Alapkezelő Zrt. with T+X days settlement and with indication of the intended redemption price, on the day of the order (T-day), as an advance payment, it shall pay to the investor the

<sup>\*\*</sup>With accrued interest valid on day T+2.

<sup>\*\*\*</sup>For shares and fund units traded on a foreign stock exchange, the actual settlement date of the transaction depends on the settlement date of the foreign counterparty. If the foreign counterparty does not settle with the Bank within T+2 days (within T+1 day for US and Canadian foreign exchanges), the settlement with the Client also takes longer.

<sup>\*\*\*\*</sup> In the case of the 1-Year Hungarian Government Security, Premium Hungarian Government Security, Bonus Hungarian Government Security, Hungarian Government Security Plus, Fixed Hungarian Government Security, Euro Hungarian Government Security and bonds issued by the Bank, only OTC sell orders can be placed. In the case of Discount Treasury Bills and Hungarian Government Bonds, if the Bank has its own stock, the Client has the option to place an OTC buy order.

intended redemption amount reduced by the redemption commission and – if the transaction involves a withholding tax on interest – by the estimated amount of the tax on interest (calculated using the last known net asset value per unit on the day of the order), and block on the Investor's securities account the relevant number of Fund Units calculated as follows: intended redemption price divided by 70% of the last valid net asset value per unit available on the day of the order (collateral multiplier). The exceptions are the funds listed in the table below:

Name of fund	Collateral multiplier
OTP EMEA Kötvény Alap (OTP EMEA Bond Fund)	80%
OTP Föld Kincsei Abszolút Hozamú Származtatott Alap (OTP Treasures of Earth Fund)	50%
OTP Fundman Részvény Alap (OTP Fundman Equity Fund)	60%
OTP Közép-Európai Származtatott Részvény Alap (OTP Central European Equity Fund)	60%
OTP Maxima Kötvény Alap (OTP Maxima Bond Fund)	80%
OTP Planéta Feltörekvő Piaci Részvény Alapok Alapja (OTP Planet Emerging Market Equity Fund of Funds)	60%
OTP Supra Abszolút Hozamú Származtatott Alap (OTP Supra Derivative Fund)	60%
OTP Török Részvény Alap (OTP Turkish Equity Fund)	60%
OTP Terra Árupiaci Alap (OTP Terra Commodity Market Fund)	60%
OTP Ingatlanbefektetési Alap "B" sorozat (OTP Real Estate Investment Fund Series "B")	50%

Example: If a Client holding units of the OTP New Europe Derivative Fund has 1,000,000 units freely available on their Consolidated Securities Account on the day of the order (T-day) and the last known net asset value per unit is 2, the Client may place a redemption order with advance payment for up to 1,000,000 \* 2 \* 70% = HUF 1,400,000.

#### 11. Standing buy orders

Retail Clients can buy fund units on a weekly, monthly, quarterly or one-off basis through a standing order. Unit purchase orders are automatically generated on the regular execution day of standing purchase orders (if it falls on a weekend or holiday, then on the next banking day). Partial execution is not possible. If on the regular execution date of the transaction there are insufficient funds in the designated payment account, the weekly, monthly or quarterly execution of the unit purchase transaction is rejected and the transaction is set to an unsecured status.

Standing buy orders can be set for any calendar date, except on the 29th, 30th and 31st of the month. The expiry date of a standing buy order cannot be a weekend or a public holiday.

A standing buy order may be placed for investment funds listed in the document titled "Investment Services Business Regulations – Annex D1 - Announcement on the fees of services in the securities business line of OTP Bank Plc. The validity of such an order may extend until a predetermined date or until revoked.

However, in the case of the OTP Céldátum (OTP Target Date) Funds (2025, 2030, 2035, 2040, 2045, 2050), the validity period may only extend until the last day of the target year specified in the product name, i.e., December 31 of that year. A standing purchase order cannot be placed with a validity period beyond this date. On the day the validity period expires, the purchase order will automatically be terminated.

Pursuant to the Investment Services Business Regulations, the Client must submit the order to the Bank in time to allow the Bank the time necessary for its execution. The Bank shall be entitled to apply a different execution schedule from the rules, regulations and practices of the Stock Exchange, KELER, Xetra, Clearstream or any regulated market, clearing house or central counterparty, in particular with regard to rest days and public holidays, based on the provisions of the Investment Services Business Regulations, the Announcement on fees

and the Supplementary Announcement. The Bank provides information on any deviating rest days or public holidays at Client's request.

#### 12. Certificates

The maturity (T) date of **certificates** (predetermined maturity date or date when the knock out is reached) is not the same as the settlement date. The certificate is withdrawn from the Consolidated Securities Account on the settlement date following its maturity and the consideration of the certificate is credited to the Client's account on the settlement date. In the case of maturity, the earliest settlement date is T+5 days, but the specific date of financial settlement is always determined by the Issuer ex-post, at the time of settlement. During the period between the maturity date and the financial settlement date, no transactions may be carried out with certificates that have already matured but are still in the securities account, and their consideration may not be used until T+5 days.

# 13. Determination of the target market for financial instruments

The Bank determines the target market for the sale, offer or supply of financial instruments pursuant to Section A.II.9 of the Business Regulations. When determining the target market of financial instruments, the Bank examines and evaluates the following categories, taking into account the nature and characteristics of the given financial instrument:

- Client type:
  - o Retail
  - Professional
  - Eligible counterparty
- Expertise and experience: risk classification
  - o Low
  - Moderate
  - o Medium
  - o Considerable
  - Significant
  - o High
  - Outstanding
- Financial situation: maximum loss of capital
  - 0 0%
  - o 0-10%
  - o 10-50%
  - o 50-100%
  - o up to over 100%
- Risk tolerance:
  - Up to low risk
  - Up to medium risk
  - Up to significant risk
  - o Up to high risk
  - Up to outstanding risk
- Client's goals and other needs:
  - o investment time horizons:
    - 0-3 years
    - 3-5 years
    - 5-10 years
    - over 10 years
    - not focused on time horizon, rather on market anomalies (speculation, hedging)
  - Client goals:
    - Future property financing
    - Retirement savings

- Ensuring short-term financial balance
- Future developments/project funding
- Investment projects
- Hedging of exchange rate and/or interest rate risk
- Increase wealth or other savings
- Speculation
- sustainability objectives
  - Sustainability factors:
    - E environmental (e.g. environment and climate protection)
    - S social (e.g. human rights)
    - G corporate governance (e.g. respecting workers' rights, fighting corruption and bribery)
  - Percentage of environmentally-sustainable investments as per the Taxonomy
  - Sustainable investment rate expressed as a percentage
  - Consideration of the various adverse impacts on sustainability

When selling, offering or distributing financial instruments to the Client, the Bank examines whether the Client belongs to the client group whose needs, characteristics, objectives and, where applicable, sustainability objectives the financial instrument is compatible with (target market analysis).

Based on the target market analysis:

- a) **positive target market**: If, based on the target market analysis, the financial instrument is compatible with the needs, characteristics and objectives of the Client;
- b) **negative target market**: If, based on the target market analysis, the financial instrument is not compatible with the needs, characteristics and objectives of the Client;
- c) **outside the (positive) target market**: If the Client is not in the positive target market of the financial instrument, but not in the negative target market either.

The Bank sells a financial instrument on or outside a negative target market only after calling the Client's attention to this fact. The Bank performs the target market analysis on the basis of the information provided in the compliance or suitability test, therefore, if the Client does not have a current compliance or suitability test or the Bank does not have the necessary information on the financial instrument, the Bank cannot perform the target market analysis.

Further provisions on the target market analysis are contained in the Business Regulations.

# 14. Risk classification of financial instruments

			Risk classification								
Instrument	Recommended minimum holding period	Return trends in the short term	Low (1)	Moderate (2)	Medium (3)	Considerable (4)	Significant (5)	High (6)	Outstanding (7)		
Structured products distributed by OTP Bank <sup>1</sup>											
Dual currency structured investment (for Private Banking clients)	until maturity	may fluctuate				Х					

until maturity	may fluctuate	Х						
until maturity	may				Х			
until maturity	may fluctuate						Х	
until maturity	may fluctuate	Х						
until maturity	may fluctuate				Х			
until maturity	may fluctuate significantly						Х	
until maturity	may fluctuate	Х						
until maturity	may				Х			
until maturity	may fluctuate						Х	
roup (exchange-traded				<u> </u>	<u> </u>	<u> </u>		
until maturity	may							
	slightly	Х						
until maturity	may fluctuate slightly	Х						
until maturity	may fluctuate slightly		Х					
until maturity	may fluctuate			Х				
until maturity	may fluctuate slightly	Х						
until maturity	may fluctuate slightly		Х					
until maturity	may fluctuate			Х				
until maturity	may fluctuate				Х			
until maturity	may fluctuate slightly	Х						
until maturity	may fluctuate slightly		Х					
until maturity	may fluctuate			Х				
until maturity	may fluctuate slightly		Χ					
until maturity	may fluctuate			Х				
until maturity	may fluctuate				Х			
until maturity	may fluctuate significantly					Х		
until maturity	may fluctuate			Х				
until maturity	may fluctuate				Х			
until maturity	may fluctuate significantly						Х	
or the State (exchange		TC)						
until maturity	may							
,	fluctuate slightly	Х						
until maturity	slightly may fluctuate slightly	X						
	until maturity	fluctuate slightly  until maturity fluctuate  until maturity may fluctuate significantly  until maturity may fluctuate slightly  until maturity may fluctuate significantly  until maturity may fluctuate significantly  until maturity may fluctuate slightly  until maturity may fluctuate slightly  until maturity may fluctuate significantly  roup (exchange-traded or OTC)  until maturity may fluctuate slightly  until maturity may fluctuate slightly	fluctuate slightly until maturity may fluctuate significantly until maturity may fluctuate significantly until maturity may fluctuate slightly until maturity may fluctuate slightly until maturity may fluctuate slightly until maturity may fluctuate slightly until maturity may fluctuate slightly until maturity may fluctuate until maturity may fluctuate slightly	International Procession	fluctuate slightly  until maturity  may fluctuate  until maturity  may fluctuate  significantly  roup (exchange-traded or OTC)  until maturity  may fluctuate  slightly  until maturity  may fluctuate  until maturity  may fluctuate  until maturity  may fluctuate  slightly  until maturity  may fluctuate  until maturity  may fluctuate  slightly  until maturity  may fluctuate  slight	fluctuate slightly until maturity may fluctuate significantly until maturity may fluctuate until maturity may fluctuate until maturity may fluctuate significantly until maturity may fluctuate until maturity may fluctuate x slightly until maturity may fluctuate x x x x x x x x x x x x x x x x x x x	slightly	Intil maturity

		1							
Mortgage bonds issued by credit institutions with a residual maturity of more than 10 years	until maturity	may fluctuate			Χ		ı T		
MREL-eligible institutional Senior Secured, Senior Preferred, Senior Unsecured bonds	until maturity	may							
issued by credit institutions and investment firms with a residual maturity of 3 years or less (HUF and FX)		fluctuate			Х				
MREL-eligible institutional Senior Secured, Senior Preferred, Senior Unsecured bonds	until maturity	may							
issued by credit institutions and investment firms with a residual maturity of more than 3 years but not more than 5 years (HUF and FX)		fluctuate				Х			
MREL-eligible institutional Senior Secured, Senior Preferred, Senior Unsecured bonds	until maturity	may							
issued by credit institutions and investment firms with a residual maturity of more than 5		fluctuate					Х		
years but not more than 10 years (HUF and FX)  MREL-eligible institutional Senior Secured, Senior Preferred, Senior Unsecured bonds	until maturity	significantly may	-				$\longrightarrow$	$\dashv$	
issued by credit institutions and investment firms with a residual maturity of more than	uniii matunty	fluctuate					l	Χ	
10 years (HUF and FX)		significantly							
Institutional Senior Non-Preferred, Subordinated Unsecured, Senior Subordinated Secured, Senior Subordinated Unsecured, Junior Subordinated Unsecured, Junior	until maturity	may fluctuate						Х	
Preferred Shares bonds (HUF and FX) issued by credit institutions and investment firms		significantly						^	
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AAA, AA+ and AA	until maturity	may					<del></del>		
credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating		fluctuate		Χ					
agency, with a residual maturity of 3 years or less  Bonds (domestic and foreign) issued by a non-sovereign Issuer with AAA, AA+ and AA	until maturity	slightly may							
credit rating as assigned by the Standard & Poor's (S&P) international credit rating		fluctuate		Χ					
agency, with a residual maturity of more than 3 years but not more than 5 years		slightly					<b></b>		
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AAA, AA+ and AA credit rating as assigned by the Standard & Poor's (S&P) international credit rating	until maturity	may fluctuate			Х				
agency, with a residual maturity of more than 5 years but not more than 10 years		nuciuale			^				
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AAA, AA+ and AA	until maturity	may						$\exists \dagger$	
credit rating as assigned by the Standard & Poor's (S&P) international credit rating	·	fluctuate				Х			
agency, with a residual maturity of more than 10 years  Bonds (domestic and foreign) issued by a non-sovereign Issuer with AA-, A+, A, A-,	until maturity	may						$\longrightarrow$	
BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P)	until maturity	fluctuate			Х				
international credit rating agency, with a residual maturity of 3 years or less									
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AA-, A+, A, A-,	until maturity	may							
BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P) international credit rating agency, with a residual maturity of more than 3 years but not		fluctuate			Χ				
more than 5 years									
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AA-, A+, A, A-,	until maturity	may							
BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P)		fluctuate				Х			
international credit rating agency, with a residual maturity of more than 5 years but not more than 10 years									
Bonds (domestic and foreign) issued by a non-sovereign Issuer with AA-, A+, A, A-,	until maturity	may						$\exists \dagger$	
BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P)		fluctuate					Х		
international credit rating agency, with a residual maturity of more than 10 years  Bonds (domestic and foreign) issued by a non-sovereign Issuer with BB+, BB, BB-, B+,	until maturity	significantly may						$\dashv$	
B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard &	and maturity	fluctuate							
Poor's (S&P) international credit rating agency, with a residual maturity of 3 years or		significantly						Х	
less Bonds (domestic and foreign) issued by a non-sovereign Issuer with BB+, BB, BB-, B+,	until maturity	may						$\longrightarrow$	
B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard &	uniii matunty	may fluctuate						V	
Poor's (S&P) international credit rating agency, with a residual maturity of more than 3		significantly						Х	
years but not more than 5 years	until moturity	may					<del></del>		
Bonds (domestic and foreign) issued by a non-sovereign Issuer with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard &	until maturity	may fluctuate							
Poor's (S&P) international credit rating agency, with a residual maturity of more than 5		significantly						Х	
years but not more than 10 years	en	-					<b></b>		
Bonds (domestic and foreign) issued by a non-sovereign Issuer with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard &	until maturity	may fluctuate							
Poor's (S&P) international credit rating agency, with a residual maturity of more than 10		significantly						Х	
years		ů ,							
Bonds (domestic and foreign) issued by a non-sovereign Issuer without credit rating as	until maturity	may						v	
assigned by Standard & Poor's (S&P)		fluctuate significantly						Х	
Hungarian government securitie									
Retail Hungarian Government Securities (1-Year Hungarian Government Security,	until maturity	may							
Hungarian Government Security Plus, Premium Hungarian Government Security, Bonus		fluctuate							
Hungarian Government Security, Fixed Hungarian Government Security, Euro Hungarian Government Security) with a residual maturity of 3 years or less (HUF and		slightly	Х						
FX)									
Retail Hungarian Government Securities (Hungarian Government Security Plus,	until maturity	may					ı T		
Premium Hungarian Government Security, Bonus Hungarian Government Security, Fixed Hungarian Government Security, Euro Hungarian Government Security) with a		fluctuate slightly		Χ					
residual maturity of more than 3 years but not more than 5 years (HUF and FX)		Silgritiy							
Retail Hungarian Government Securities (Hungarian Government Security Plus,	until maturity	may			.,				
Premium Hungarian Government Security, Bonus Hungarian Government Security) with a residual maturity of more than 5 years (HUF and FX)		fluctuate			Х				
Discount Treasury Bills and MNB-issued bonds	until maturity	may							
		fluctuate	Χ						
Thus gorion Coversment Bondo with a socialist contribution (C	undil month with a	slightly					<b></b>		
Hungarian Government Bonds with a residual maturity of 3 years or less	until maturity	may fluctuate		Х					
	l		1	^			ı		
		slightly	!				'		
Hungarian Government Bonds with a residual maturity of more than 3 years but not more than 5 years	until maturity	may fluctuate		Χ					

١	Hungarian Government Bonds with a residual maturity of more than 5 years but not more than 10 years	until maturity	may fluctuate			Χ				
İ	Hungarian Government Bonds with a residual maturity of more than 10 years	until maturity	may fluctuate				Х			
l	FX Government Bonds issued by the Hungarian State with a residual maturity of 3 years or less	until maturity	may fluctuate			Х				
İ	FX Government Bonds issued by the Hungarian State with a residual maturity of more than 3 years but not more than 5 years	until maturity	may fluctuate			Χ				
İ	FX Government Bonds issued by the Hungarian State with a residual maturity of more than 5 years but not more than 10 years	until maturity	may fluctuate				Х			
	FX Government Bonds issued by the Hungarian State with a residual maturity of more than 10 years	until maturity	may fluctuate significantly					Х		
l	Government securities not issued by the Hu	ıngarian State (exchai		OTC)						
	Government securities issued by a foreign State with AAA, AA+ and AA credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of 3 years or less	until maturity	may fluctuate slightly	Х						
	Government securities issued by a foreign State with AAA, AA+ and AA credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 3 years but not more than 5 years	until maturity	may fluctuate slightly	Х						
	Government securities issued by a foreign State with AAA, AA+ and AA credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 5 years but not more than 10 years	until maturity	may fluctuate slightly		Х					
	Government securities issued by a foreign State with AAA, AA+ and AA credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 10 years	until maturity	may fluctuate			Х				
	Government securities issued by a foreign State with AA-, A+, A, A-, BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of 3 years or less	until maturity	may fluctuate slightly		х					
	Government securities issued by a foreign State with AA-, A+, A, A-, BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P²) international credit rating agency, with a residual maturity of more than 3 years but not more than 5 years	until maturity	may fluctuate slightly		х					
	Government securities issued by a foreign State with AA-, A, A, A-, BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P²) international credit rating agency, with a residual maturity of more than 5 years but not more than 10 years	until maturity	may fluctuate			Х				
	Government securities issued by a foreign State with AA-, A+, A, A-, BBB+, BBB and BBB- credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 10 years	until maturity	may fluctuate				Х			
	Government securities issued by a foreign State with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard & Poor's (S&P²) international credit rating agency, with a residual maturity of 3 years or less	until maturity	may fluctuate significantly						х	
	Government securities issued by a foreign State with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 3 years but not more than 5 years	until maturity	may fluctuate significantly						х	
	Government securities issued by a foreign State with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 5 years but not more than 10 years (rating is long-term, in foreign currency)	until maturity	may fluctuate significantly						х	
	Government securities issued by a foreign State with BB+, BB, BB-, B+, B, B-, CCC+, CCC, CCC-, CC, C and D credit rating as assigned by the Standard & Poor's (S&P <sup>2</sup> ) international credit rating agency, with a residual maturity of more than 10 years	until maturity	may fluctuate significantly						х	
	Bonds issued by a foreign State without credit rating as assigned by the Standard & Poor's (S&P²) international credit rating agency	until maturity	may fluctuate significantly						Х	
I	Units of open-end investment funds distributed by OTP Bank	in the framework of co	ontinuous distr	ibutio	n					
	In the case of public open-end investment funds distributed by OTP Bank Plc., the risk clatter risk indicator contained in the KID (Key Information Document*), with the proviso that in given investment fund (unit). The KIDs are available at OTP Bank Plc. branches, on <a href="https://www.therecommended.minimum.holding.periods">www.therecommended.minimum.holding.periods</a> are contained in the documents entitled "Annopremium clients" and "Announcement on product characteristics of public open-end and	no risk classification lowe otpbank.hu and on the is ouncement on the produ	r than the risk in suer's website. ct characteristics	dicato The ris s of inv	r contai sk classi vestmer	ned in i ification nt funds	the KIE n applie s availa	is ass ed by thable for	signed to ne Bank regular	o the c and r and
ŀ	Banking and Digital Private Banking clients".				-				-	
ŀ	Exchange-traded shares and Domestic shares in the BUX Basket <sup>3</sup> and other shares in the BSE Prime Market <sup>5</sup> (BSE	other financial instrum 3–5 years	may						I	
١	spot order)	-	fluctuate				Х			
	Shares in the BSE Standard Market <sup>6</sup> outside the BUX Basket <sup>3</sup> (BSE spot order)	3–5 years	may fluctuate significantly					Х		
	Shares admitted to the BSE Xtend Market <sup>8</sup> (BSE spot order)	3–5 years	may fluctuate significantly						Х	
	Compensation notes (BSE spot order)	over 10 years	may fluctuate significantly						Х	
	Closed-end units issued by OTP Alapkezelő and OTP Ingatlan Befektetési Alapkezelő (BSE spot order)	until maturity	may fluctuate	Inga the	he case nanaged atlan Ala investm DTP Bar	I by OT ipkezel nent fur nk Plc.	P Alap ő, the r nd (unit on the	kezelő risk clas t) is det basis o	and OT ssification termined	TP on of d by sk

			that indic the are or we the	racterist	classife ontained nivestmested at Cotpbanl he risk and the g period ouncer	ication d in the lent fun DTP Ba k.hu an classif recom d can b nent or	lower to KID is ad (unit ank Plc. ad on the ication mende to the property of the property of the property fundament	than the assign (assign). The has branche issue applied mining the roduct ads ava	e risk ed to (IDs nes, er's d by num
Closed-end units not issued by OTP Alapkezelő or OTP Ingatlan Befektetési Alapkezelő (BSE spot order)	3–5 years	may fluctuate			Х				
Shares traded on the Deutsche Börse (stock exchange spot order)	3–5 years	may fluctuate				Х			
Shares traded under spot orders executed by other execution partners	3–5 years	may fluctuate				Х			
ETFs without leverage (Exchange Traded Fund)	3–5 years	may fluctuate				Х			
ETFs with leverage (Exchange Traded Fund)	3–5 years	may fluctuate significantly						Х	
Unleveraged certificates (derivatives whose price depends solely on the price of the underlying product (index, structure, etc.))	0-3 years	may fluctuate significantly					Х		
Leveraged certificates (derivatives whose price depends solely on the price of the underlying product (index, structure, etc.))	0-3 years	may fluctuate significantly						Х	
Warrants (option warrants)	0-3 years	may fluctuate significantly						Х	
Domestic and foreign bond-based (e.g. liquidity, money market bond) investment units not traded by OTP in continuous trading	3–5 years	may fluctuate			Χ				
Domestic and foreign mixed or absolute yield investment units not traded by OTP in continuous trading	3–5 years	may fluctuate				X			
Domestic and foreign equity, real estate, derivative and commodity-based investment units not traded by OTP in continuous trading	3–5 years	may fluctuate significantly					Х		
Other financial instruments not classified (e.g.: securities issued by private placement)	individual*	may fluctuate significantly						Х	

			Risk classification						
Instrument	Recommended minimum holding period	Return trends in the short term	Low (1)	Moderate (2)	Medium (3)	Considerable (4)	Significant (5)	High (6)	Outstanding (7)
Non-securities products available e	exclusively through Global N	Markets Service	es <sup>7</sup>						
BSE forward orders	individual*	may fluctuate significantly							Х
Other foreign exchange forward orders	individual*	may fluctuate significantly							Х
FX forward transaction	individual*	may fluctuate significantly							Х
Stock exchange option transaction	individual*	may fluctuate significantly							Х
Foreign exchange option transaction	individual*	may fluctuate significantly							Х
Interest rate swap transaction	individual*	may fluctuate significantly							Х
Interest rate options transaction	individual*	may fluctuate significantly							Х
Forward rate transaction	individual*	may fluctuate significantly							Х

Forward deals in precious metals (gold and silver)	individual*	may fluctuate significantly						Х	
Commodity swap transaction	individual*	may fluctuate significantly						Х	
Inflation swap transaction	individual*	may fluctuate significantly						Х	
Dual currency structured investment (for clients with Global Markets Framework Agreement)	individual*	may fluctuate significantly			Х				
Non-securities product available exclusively as part of Global Markets Services or to clients with a Private Banking Master Agreement									
LTIA T+3 Forward transaction	until maturity	may fluctuate		Х					

<sup>\*</sup>The recommended minimum holding period for the Instrument depends on the Client's transaction objectives, risk-bearing capacity and the specific characteristics of the transaction.

#### **Definitions:**

- <sup>1</sup> Structured products: see Section 16
- <sup>2</sup> S&P credit rating: The rating assigned by the Standard & Poor's (S&P) international credit rating agency for a country's domestic debt, determined in the a long term and in foreign currency. Standard and Poor's rates borrowing countries on a scale from AAA to D.
- <sup>3</sup> BUX basket: contains the shares of the companies listed on the Budapest Stock Exchange with the highest turnover and capitalisation. The basket contains a minimum of 12 and a maximum of 25 shares.
- <sup>4</sup> Key Information Document or KID: the key features and risks of packaged retail investment products as defined in Regulation (EU) No 1286/2014 and Regulation (EU) 2017/653
- § BSÉ Prime Market: Among the shares listed on the BSE, this includes the share series of the most liquid and widely held companies. Every six months, the Exchange reviews the classification of securities in the Prime Market according to specific indicators. The market value of the series of listed securities included in the category must be at least HUF 5 billion.
- <sup>6</sup> BSE Standard Market: Among the shares admitted to trading on the BSE, the securities of public limited companies may be admitted to trading and registered in this category if, in addition to meeting the legal requirements, there was a public offering of shares at the time of admission.
- <sup>7</sup> Non-securities product available exclusively through Global Markets Services: Transactions or instruments which are only available to Clients through the Markets Department of the Bank's Global Markets Directorate, under a specific contract. Detailed information about the transactions available exclusively through Global Markets Services is available on the Bank's website (www.otpbank.hu/portal/hu/GlobalMarkets).
- <sup>8</sup> BSE Xtend market: a multilateral trading platform (MTF) operated by the Budapest Stock Exchange (BSE), which provides medium-sized companies with public access to the capital markets.

The risk classification of the structured products, financial instruments, securities, other products and special transactions relating thereto (hereinafter collectively referred to in this section as "investment products") marketed by the Bank, as set out in the table above, is indicated by 7 categories, with the lowest risk classification being "Low (1)" and the highest "Outstanding (7)".

On the scale of 1 to 7, the risk classification of investment products is determined by the volatility of the investment product, its yield spread, its liquidity, the economic and financial situation of its issuer and its capital protection, if any, on the assumption that the execution takes place at the execution venue and using the technique primarily indicated in the Bank's Execution and Allocation Policy. If the execution of a given investment product is carried out in a venue and by a method other than the execution venue and technique primarily proposed in the Bank's Execution and Allocation Policy, the risk classification of the investment product is always "Outstanding 7".

Further information and detailed terms and conditions relating to the given investment product and the risks of the investment are set out in the prospectus, base prospectus, final terms, prospectus, information note, product description, prospectus including the management regulations, the fund management policy, the KID or, where applicable, the key investor information, which are applicable to the marketing and sale of the investment product concerned. It is not possible to draw any reliable conclusions about future performance, returns or changes from the past performance or returns of a given investment product.

In the case of investment products with a fixed maturity, the risk classification of the investment products reflects the risk of holding them to maturity. For investment products with no maturity, the risk classification of the investment products reflects the risk of holding for the recommended minimum holding period. Returns may fluctuate over the term and recommended time horizon. By holding to maturity or selling beyond the recommended holding period, the risk is – expected to be – reduced. The recommended minimum time horizon is based on past experience. Within the term (before the maturity of the security), or in the shorter term than the

recommended minimum holding period, risk and volatility may increase, the return available may fluctuate significantly, and the capital invested may not be recovered.

As residual maturity decreases, the risk of the investment product is expected to decrease. However, the longer the term of the investment product (either until maturity or by the recommended minimum holding period), the higher the risk of selling or redeeming within the recommended holding period.

The price of an investment product changes during its term, and before the maturity date, the investment product can only be sold at the current price, which may result in losses.

The risk classification of investment products is not a constant value over the recommended holding period, as the economic and financial situation of issuers, counterparties, market events and other circumstances may change. It is the responsibility of the Client to monitor the current risk classification of the investment products in their portfolio at all times during the holding period. The Bank reserves the right to review the range of investment products and the risk level of investment products, their risk classification in justified cases, but at least quarterly and, if necessary, to change the risk classification of the investment products concerned by amending this Supplementary Announcement on the Bank's website without prior written notice and without any special notification.

The change in the risk classification of the investment products does not affect the information provided by the Bank to the Client in the case of transactions and orders prior to the change, in the light of the results of the suitability and/or compliance test completed by the Client.

In the case of orders and transactions placed after the change in the risk classification of investment products, the risk classification of the investment products is subject to the amended provisions of the Supplementary Announcement, thus even when the Client's answers to the suitability and/or compliance test and the data taken into account remain unchanged, the result of the evaluation of the investment products with the amended risk classification may change.

The Bank has relied in good faith on sources it believes to be reliable in arriving at the risk classification in this Supplementary Announcement, but the Bank assumes no responsibility or liability for the current risk classification of individual investment products, nor for the completeness, accuracy or adequacy of the data used in the assessment. In determining the current risk classification of investment products, the Bank uses only publicly accessible and available information and decides on the current risk classification on a quarterly basis. This Supplementary Announcement entitled "14. Risk classification of financial instruments" is published by the Bank in order to comply with certain information provision obligations under the Investment Firms Act and Commission Delegated Regulation 2017/565 (EU). The risk of specific individual decisions and investments made on the basis of this Supplementary Announcement are borne by the Client, and the Bank shall not be liable for the profitability of the investment decisions or the achievement of the objective set by the Client.

For the transaction types specified in the table 'Non-securities products available exclusively through Global Markets Services' (hereinafter in this chapter: Derivatives), upon assessing suitability and compliance, the Bank takes into account if the Bank's Client intends to enter into an Individual Transaction for hedging purposes. Hedging may only be indicated in the case of a Client who has concluded a Global Markets Framework Agreement, or an individual Global Markets (framework) agreement with the Bank. In the case of an Individual Transaction, the prerequisite for the declaration of hedging purpose is that the Client has sufficient knowledge of derivatives based on the 'Investment knowledge and experience' declaration in the suitability and compliance test and that the Client also indicates hedging (Hedging of exchange rate and/or interest rate risk) in the 'Investment objectives, time horizon' section of the suitability and compliance test.

In the case of derivatives, the Bank accepts the Client's declaration at the time of conclusion of the Individual Transaction that the Individual Transaction is concluded for hedging purposes. The determination of the specific terms of the hedge transaction is the responsibility of the Client, the Bank is not obliged, nor is it entitled under the legal regulations on banking, securities and trade secrets, to examine the terms of the Individual Transaction/s to be hedged by the Client, and therefore the Bank is not liable for the achievement of the Client's intended purpose.

Hedging transactions typically result in a reduction in the aggregate risk level of the Client's outstanding transactions (open positions). The Bank treats the risk level of derivatives, if the Client explicitly declares the

hedging purpose at the time of entering into the individual transaction, as a 'Significant' (5) risk level product for the purposes of assessing suitability and compliance, taking into account the result of hedging in reducing the overall risk level. On this basis, for a Client with a 'Balanced' or 'Dynamic' risk profile, in addition to the data of the *risk profile / financial instrument risk* classification matrix indicated in Chapter '18', the individual transaction for the *relevant* hedging derivative *shall be* considered suitable or appropriate and the Client *shall* also *be* entitled to receive investment advice for the *relevant* hedging derivative.

# 15. Complex products

A complex product is any financial instrument that pursuant to the Investment Firms Act does not fall into the non-complex category.

Section 45 of the Investment Firms Act qualifies the following financial instruments as non-complex products:

- the transaction relates to shares admitted to trading on a regulated market or in an equivalent third country market, or to a multilateral trading facility, excluding collective investment instruments issued by an AIF provided for in the Collective Investments Act, and excluding shares that embed a derivative; or
- the transaction relates to debt securities or other forms of securitized debt admitted to trading on a regulated market or in an equivalent third country market, or to a multilateral trading facility, excluding those instruments that embed a derivative or incorporate a structure which makes it difficult for the client to understand the risk involved; or
- the transaction relates to money-market instruments, excluding those instruments that embed a
  derivative or incorporate a structure which makes it difficult for the client to understand the risk involved;
  or
- the transaction relates to collective investment instruments in UCITS, excluding structured UCITS as referred to in the second subparagraph of Article 36(1) of Regulation 583/2010/EU; or
- the transaction relates to structured deposits, excluding those that incorporate a structure which makes it difficult for the client to understand the risk involved or the cost of exiting the product before term
- the object of the transaction is a non-complex financial instrument not listed in the above sections, which fulfils the criteria set out in Article 57 of Commission Delegated Regulation (EU) 2017/565.

Pursuant to Article 57 of Commission Delegated Regulation (EU) 2017/565, a financial instrument shall be considered as non-complex if it satisfies the following criteria:

- a) it does not fall within Article 4(1)(44)(c) of, or points (4) to (11) of Section C of Annex I to Directive 2014/65/EU:
- b) there are frequent opportunities to dispose of, redeem, or otherwise realise that instrument at prices that are publicly available to market participants and that are either market prices or prices made available, or validated, by valuation systems independent of the issuer;
- c) it does not involve any actual or potential liability for the client that exceeds the cost of acquiring the instrument;
- d) it does not incorporate a clause, condition or trigger that could fundamentally alter the nature or risk of the investment or pay out profile, such as investments that incorporate a right to convert the instrument into a different investment:
- e) it does not include any explicit or implicit exit charges that have the effect of making the investment illiquid even though there are technically frequent opportunities to dispose of, redeem or otherwise realise it;
- f) adequately comprehensive information on its characteristics is publicly available and is likely to be readily understood so as to enable the average retail client to make an informed judgment as to whether to enter into a transaction in that instrument.

At the express request of Clients, the bank branches involved in the distribution of securities provide information on whether the security in question qualifies as a complex product.

# 16. Structured products, Deposits, Dual currency structured investment DCI, Dual Currency Structured Investment DCFA

Structured deposit: a deposit which is fully repayable at maturity on terms under which interest or a premium will be paid or is at risk, according to a formula involving factors such as:

- a) an index or combination of indices, excluding variable rate deposits whose return is directly linked to an interest rate index such as Euribor or Libor.
- b) a financial instrument or combination of financial instruments,
- c) a commodity or combination of commodities or other physical or non-physical non-fungible assets; or
- d) a foreign exchange rate or combination of foreign exchange rates.

Among other things, the provisions of the Investment Firms Act on the product approval process, registration of services, activities and transactions, information provision to clients, suitability and compliance testing, handling of client orders, and transactions with eligible counterparties, must also be applied to investment firms and credit institutions when they sell or advise their clients on structured deposits or dual currency structured investments.

Additional information on the characteristics and risks of dual-currency structured investments DCI is available in the relevant prospectus on Dual currency structured investments DCI, available on the Bank's Private banking website (<a href="https://www.otpbank.hu/privatebanking/Fooldal">https://www.otpbank.hu/privatebanking/Fooldal</a>) and at branches.

Additional information on the characteristics and risks of dual-currency structured investments DCFA is available in the relevant prospectus on Dual currency structured investments DCFA, available on the Bank's website (<a href="https://www.otpbank.hu/hirdetmeny/aktualis/T\_BSZ\_ketdev\_struk">https://www.otpbank.hu/hirdetmeny/aktualis/T\_BSZ\_ketdev\_struk</a>) and at branches.

#### 17. Deleted

# 18. Risk profile / financial instrument risk classification matrix

Risk profile/Securities <sup>1</sup> risk classification	Low (1)	Moderate (2)	Medium (3)	Considerable (4)	Significant (5)	High (6)	Outstanding (7)
Stable	X	Х	Х				
Conservative	Х	Х	Х	Х			
Balanced	Х	Х	Х	Х	X		
Dynamic	Х	Х	Х	Х	Х	Х	
Aggressive	Х	Х	Х	Х	X	Χ	Х

- **e/** The risk profile/financial instrument risk classification matrix shows which financial instrument is suitable/appropriate for the Client based on the results of the suitability/compliance test.
- f/ Risk profile: The risk group/category into which the Bank classifies the client on the basis of the answers given in the suitability/compliance test, taking into account the client's knowledge, experience, education, size and frequency of investment transactions, in particular their characteristics and risks (compliance profile), and in addition, the client's risk appetite, financial situation, with particular attention to the client's ability to bear losses and investment objectives (suitability risk profile).

<sup>&</sup>lt;sup>1</sup> securities for the purposes of this Section 18 mean financial instruments.

#### 19. Combined savings

A combined savings product (hereinafter: combined deposit) is a product that includes a deposit and a financial instrument or other savings instrument under two separate contracts, where the purchase of both products together (at the same time or within a certain time period) is a condition for being entitled to the conditions offered by the product (in particular, the special deposit interest rate).

The combined deposit-type investment products offered by the Bank typically represent a combination of a unit of a closed-end, yield-protected investment fund managed by OTP Alapkezelő Zrt. or OTP Ingatlan Befektetési Alapkezelő Zrt. and a deposit product with a preferential interest rate (HOZAMDUÓ Savings Packages).

Information on current investment products linked to the combined deposit product is available in the Bank's branches and on the Bank's website at <a href="www.otpbank.hu">www.otpbank.hu</a>. In respect of investment funds, detailed information is available in the investment fund documents available in the Bank's branches and on the website of the Issuer, such as the Prospectus, including the Fund Management Policy, the Key Investor Information, as well as in the annual and semi-annual reports and monthly portfolio reports of the funds concerned.

#### 20. Account schemes that can be linked to a securities account

# 21. Payment account schemes

Pursuant to Section A.II.1.1.1 of the Investment Services Business Regulations, the payment accounts with the following names and designations may be assigned to the Regular Consolidated Securities Account and the PSA, LTISA and START securities accounts in the consolidated securities account contract corresponding to the account type.

# **CONSOLIDATED** (Regular) securities account

A3BD	FX account of the standard DEVIZAPLUSZ	KBPP	PATIKA account package	MKAL	Payment account for foundations and donations
A4BD	account package  FX account of the E-DEVIZAPLUSZ account package	KBS2	Payment account for enterprises	MKE2	Small business E-account package
AG5D	Payment account for enterprises – FX	KBS3	Standard DEVIZAPLUSZ account package	MKE3	Payment account for the small business E- Devizaplusz account package
AG5P	Payment account for enterprises	KBS4	Payment account for enterprises	MKES	OTP E-FORINT payment account
AGE2	E-account Package	KBS5	Payment account for enterprises	MKEZ	Small business START account package
AGE3	E-DEVIZAPLUSZ account package	KBV2	MIKRO account package	MKGD	Payment account for enterprises – FX
AGES	E-FORINT payment account for enterprises	KBVA	BÁZIS account package	MKGP	Payment account for enterprises
AGEZ	START account package	KBVD	Payment account for enterprises – FX	MKID	FX payment accounts for enterprises
AGGD	Payment account for enterprises – FX	KBVG	GOLD account package	MKJP	Small business JOG-ÁSZ account package
AGGP	Payment account for enterprises	KBVH	STANDARD account package	MKK1	Payment account
AGID	Payment account for enterprises – FX	KBVK	KOMFORT account package	MKK2	Payment account
AGK1	Payment account for enterprises	KBVP	Payment account for enterprises	MKK3	Payment account
AGK2	Payment account for enterprises	KCGP	Payment account for enterprises	MKK4	Payment account
AGK3	Payment account for enterprises	KCGD	Payment account for enterprises – FX	MKKÖ	Small business KÖNYVELŐI account package
AGK4	Payment account for enterprises	KHVP	Payment account for enterprises	MKLE	Small business SZINKRONEXTRA account package
AGKI	Payment account for TERRA account package	KHVD	Payment account for enterprises – FX	MKLH	Small business SZINKRON account package
AGNP	Payment accounts for non-profit organisations	KSNP	Payment accounts for public service organisations	MKNP	Payment accounts for non-profit organisations
AGS2	Payment account for enterprises	KSVD	Payment accounts for public service organisations – FX	MKPE	Payment account
AGS3	Standard DEVIZAPLUSZ account package	LABD	Retail domestic FX account	MKPO	NON-PROFIT account package
AGS4	Payment account for enterprises	LAES	Retail electronic account	MKPP	Small business PATIKA account package
AGS5	Payment account for enterprises	LAFI	JUNIOR account package	MKS2	OTP E-FORINT payment account
AGV2	MIKRO account package	LAFO	Retail current account	MKS3	Small business STANDARD DEVIZAPLUSZ account package
AGVA	BÁZIS account package	LAGD	Retail guardianship FX account	MKS4	OTP E-FORINT payment account
AGVD	Payment account for enterprises – FX	LAJU	Retail JUNIOR account	MKS5	OTP E-FORINT payment account
AGVG	GOLD account package	LAKE	JUMP account package	MKTA	BASIC account package
AGVH	STANDARD account package			MKTC	TAKAROS account package
AGVK	KOMFORT account package	LAMI	BASIC account package	MKTG	CONDOMINIUM MAXI account package
AGVP	Payment account for enterprises	LANE	NET account package	MKTH	Condominiums and housing co-operatives management accounts
K3BD	FX account of the Standard DevizaPlusz account package	LAPO	PREMIUM account package*	MKTI	CONDOMINIUM MINI account package
K4BD	FX account of the E-DEVIZAPLUSZ account package	LAPR	Private Banking and Prestige Private Banking account package	MKTU	Condominiums and housing co-operatives management accounts
KB5D	Payment account for enterprises – FX	LATM	TEMPÓ account package	MKTZ	MOZAIK account package
KB5P	Payment account for enterprises	LAXA	OTP OKÉ 5 account	MKV2	Small business MIKRO account package

KBAL	Payment accounts for foundations and donations	LAXI	OTP OKÉ 6 account	MKVA	Small business BÁZIS account package
KBE2	E-account Package	LAEU	EU basic account	MKVD	FX payment accounts for enterprises
KBE3	E-DEVIZAPLUSZ account package	LDPB	Digital Private Banking service package	MKVG	Small business GOLD account package
KBES	E-FORINT payment account for enterprises	LFGY	Retail guardianship HUF account	MKVH	Small business STANDARD account package
KBEZ	START account package	LFIM	Smart account package	MKVK	Small business KOMFORT package
KBGD	Payment account for enterprises – FX	LPPL	PRÉMIUM PLUSZ account package	MKVP	Payment accounts for enterprises
KBGP	Payment account for enterprises	LSIM	Smart account package	ÖNÉP	Municipal clients securities sub-account
KBID	Payment account for enterprises – FX	LSID	SMART FX account	ÖNKD	Municipal clients payment account – FX
KBJP	JOG-ÁSZ account package	M3BD	FX account of the small business STANDARD DEVIZAPLUSZ account package	ÖNKP	Municipal clients payment account
KBK1	Payment account for enterprises	M4BD	FX account of the small business E- DEVIZAPLUSZ account package	VTNP	Payment accounts for non-profit organisations
KBK2	Payment account for enterprises	M5PD	Payment account for enterprises – FX	VTES	E-FORINT payment account for enterprises
KBK3	Payment account for enterprises	MAES	Agrár E-Forint payment account	LAFF	Base Account
KBK4	Payment account for enterprises	MAKI	Small business TERRA account package – payment account	LAIF	JUNIOR account (for clients between the age of 14-18)
КВМО	Payment account for enterprises	MANP	AGRÁR non-profit account	LADI	JUNIOR account (for clients younger than the age of 14)
KBNP	Payment account of non-profit and other organisations	MAVP	AGRÁR payment account	LAGR	GRÁTISZ account package
KBPE	Payment account for enterprises	MK5P	Payment account for enterprises	AGS7	Payment account for enterprises
KBPO	NON-PROFIT account package	MKS7	OTP E-FORINT payment account	KBS6	Payment account for enterprises
MKS6	OTP E-FORINT payment account	AGS6	Payment account for enterprises	KBS7	Payment account for enterprises
MKS8	Széchenyi Card ÚJRAINDÍTÁSI MAX account	AGS8	Széchenyi Card ÚJRAINDÍTÁSI MAX account	KBS8	Széchenyi Card ÚJRAINDÍTÁSI MAX account
MKS9	Széchenyi Card Overdraft MAX+	AGS9	Széchenyi Card Overdraft MAX+	KBS9	Széchenyi Card Overdraft MAX+
MNSP	Entrepreneurial SPRINT forint payment account	MNS2	Entrepreneurial SPRINT additional forint payment account	MNSD	Entrepreneurial SPRINT additional payment account-FX
MNMP	Entrepreneurial MARATON forint payment account	MNM2	Entrepreneurial MARATON additional forint payment account	MNMD	Entrepreneurial MARATON additional payment account-FX
KNSP	Entrepreneurial SPRINT forint payment account	KNS2	Entrepreneurial SPRINT additional forint payment account	KNSD	Entrepreneurial SPRINT additional payment account-FX
KNMP	Entrepreneurial MARATON forint payment account	KNM2	Entrepreneurial MARATON additional forint payment account	KNMD	Entrepreneurial MARATON additional payment account-FX
ANSP	Entrepreneurial SPRINT forint payment account	ANS2	Entrepreneurial SPRINT additional forint payment account	ANSD	Entrepreneurial SPRINT additional payment account-FX
ANMP	Entrepreneurial MARATON forint payment account	ANM2	Entrepreneurial MARATON additional forint payment account	ANMD	Entrepreneurial MARATON additional payment account-FX
KBFP	Corporate Futures forint payment account	KBFD	Corporate Futures payment account-FX		

<sup>\*</sup>No longer available for sale from 17 June 2024. No new LAPO securities accounts can be opened until the end of the termination period, i.e. 31.10.2024, and existing LAPO accounts must be converted to a new account package (as specified in the information letter sent to the customers concerned in June 2024).

PSA-D securities account LÉNY Retirer		Retirement savings account
	LÉBS	Long-term investment securities account
Long-term Investment	LÉBD	Long-term investment securities account – FX
Securities Account	MKTE	Long-term investment securities account
START securities account	LAST	START account

#### 22. Client account scheme

Client accounts with the following names and designations may be linked to the securities account with a client account linked.

LÉSZ	Securities client account
LÉSD	Securities client account USD, EUR, CHF

# 23. Stability Savings Account scheme

Accounts with the following names and designations may be linked to the Stability Savings Account.

LÉMS	SSA client account

# 24. Conditions for receiving transfers of securities to a securities account with the Bank

If the Client wishes to transfer securities from an external investment service provider to a securities account held with the Bank, the transfer order must specify as the destination account the number of the Bank's following sub-account held with KELER, unless it is a sub-account registered to a name:

# 0060/M or 0060M00000

The transfer of securities received by the Bank is only credited to the Client's active-status Consolidated Securities Account if the transaction includes the Client's name, the number of the Client's Consolidated Securities Account, as well as data suitable for the Client's unambiguous identification (e.g. address and personal identification document number).

If the identification does not lead to a result (unidentified transfer), the Bank reverses the transfer of securities after 2 days if the data has not been completed (provision of missing personal data, opening a missing securities account with the Bank, or, in the case of multiple securities accounts, specification of the destination account, etc.).

In addition to the above, it is the Client's responsibility to provide the Bank with appropriate documentation and to inform the Bank of the cost, acquisition price and date of the transfer of securities received by the Bank. In the absence of the required data, the Bank proceeds as follows when crediting the given security to the securities account:

- with HUF zero acquisition price (without taking into account the cost of acquisition) and
- with the date of crediting the security to the securities account as the date of acquisition.

The Bank accepts the Client's order even in the absence of the acquisition data of the security, however, the alienation of securities recorded with an incorrect price and date may result in a disadvantageous situation for the Client from the point of view of tax legislation.

### 25. Notification of the registrar

Notification of the share register's registrar of the crediting or debiting of shares issued by a public or private limited company shall be made in accordance with the provisions of Sections B.II.6.2. and B.II.6.3. of the currently effective Investment Services Business Regulations and as per the following:

# **Determining the person of the registrar:**

The person of the registrar is determined by the Bank on the basis of the following sources:

- 4		<u> </u>	<u> </u>
	Order*	In case of a private company limited by shares (Zrt.)	In case of a public company limited by shares (Nyrt.)
	1.	The legal person named by the Client in the Declaration of Authorisation**.	The registrar published in the Company Gazette.
	2.	The registrar published in the Company Gazette.	The registrar published on the website of the Nyrt.
	3.	The Zrt.'s Board of Directors.	The Nyrt.'s Board of Directors.

#### Determination of the notification address of the registrar:

The notification address of the registrar is determined by the Bank on the basis of the following sources:

	Order*	In case of a private company limited by shares (Zrt.)	In case of a public company limited by shares (Nyrt.)	
Ī	1.	The email address or electronic delivery address specified by the Client in the Declaration of Authorisation**.	The email address or electronic delivery address in the Company Registry.	
	2.	The email address or electronic delivery address in the Company Registry.	The registrar published on the website of the Nyrt.	
	3.	If no email address or electronic delivery address is available based on the above sources, the Bank sends the notification to the registered office of the registrar by mail registered or acknowledgement of receipt requested.	If no email address or electronic delivery address is available based on the above sources, the Bank sends the notification to the registered office of the registrar by mail registered or acknowledgement of receipt requested.	

<sup>\*</sup>The order in which sources are used. The sources with a higher number in the order are only used if the source shown first in the order does not include the person of the registrar.

<sup>\*\*</sup> The Client's declaration complying with the provisions of the Investment Firms Act and delivered to the Bank, authorising the transfer of the securities secrets which represent the content of the notification to the registrar.

#### 26. Key principles for the generation of the securities portfolio (portfolio valuation price)

Securities are valuated at the portfolio valuation price to ensure consistent reporting and handling. The portfolio valuation price is derived by security type as follows:

- Shares, Compensation notes, Certificates: The portfolio valuation price is derived primarily from the stock
  market closing price. For securities traded on the Budapest Stock Exchange, the BSE prices are used,
  for securities traded on the Frankfurt Stock Exchange, Xetra prices are used. In the absence of a stock
  market price, the price data published on the Bloomberg screens may form the basis for portfolio pricing.
- Fund units, ETFs: The portfolio valuation price is derived primarily on the basis of the net asset value of the fund unit, while for domestic investment funds based on BAMOSZ data. In the absence of a net asset value of an investment unit or, in the case of foreign investment units and ETFs, the price data published on the Bloomberg screens may form the basis for portfolio pricing.
- Mortgage Bonds issued by the Bank: The portfolio valuation price is derived primarily from the stock exchange closing price on the BSE or, if this is not available, from the average price on the stock exchange. In the absence of a stock exchange price, the buy price quoted by the Bank, in the absence of a buy price quoted by the Bank, the price data published on the Bloomberg screens may form the basis for portfolio pricing.
- Debt securities: The portfolio valuation price is derived primarily from the best buy price quoted by the ÁKK or, in the absence of a best buy price from the ÁKK, from the buy price quoted by the Bank. If the buy price quoted by the Bank is not available, on the stock exchange closing price or, in the absence of the closing price, the price data published on the Bloomberg screens may form the basis for portfolio pricing.

If no price is available for any security in any of the above categories for any price type, the valuation is made at 100% of the face value for the given security on the date of the valuation.

The purchase price used is the direction of repurchase from the Client from the Bank's point of view.

The price of financial instruments is determined on the basis of an estimated value if the portfolio valuation price is derived from a market price older than 5 calendar days or the financial instrument is reported at its face value. The absence of a market price may indicate a lack of liquidity.

The net asset value is the value of the assets in the portfolio of the investment fund – including accrued and deferred assets and receivables from lending arrangements – less the total of all liabilities charged to the portfolio, including accrued expenses and deferred income.

The Bank draws the attention of the Clients to the fact that the buying and selling of units of closed-end investment funds listed on the stock exchange can only be carried out on the stock exchange during their term and that the sale/buy price of the units on the stock exchange may differ from the net asset value per unit reflecting the current value of the units, depending on current supply and demand.

For the OTPdirekt Internet and OTPdirekt Broker and OTPdirekt SmartBroker services, the securities portfolios reported are valued at the portfolio valuation price, but securities traded on the Budapest Stock Exchange and the Frankfurt Stock Exchange – except for fund units – are revalued at the last known stock exchange transaction price available to us.

In the case of the OTP SingleMarket service, securities traded on the Budapest Stock Exchange and the Frankfurt Stock Exchange are valued at the intraday stock exchange price, and where this is not available, at the last known closing price.

In the derivation of the portfolio valuation price, the various price types are examined retroactively for 30 days for liquid securities (e.g.: BSE-traded shares) and 90 days for medium-liquid securities (e.g.: closed-end fund units) within the given price type. If there is no official price within a given price type for the period in question, the sequentially next price types are examined for that period, as appropriate.

If the security is illiquid (e.g.: low-turnover or non-marketable securities, or securities with limited marketability), the prices are retroactively examined for 180 days. Each day, each price type concerned will be examined in

turn as necessary. If there is no official price recorded for any of the price types concerned for a given day, the examination continues with the prices recorded for the previous days.

# 27. Deviating rules for the generation of the portfolio valuation price for Clients with a private banking contract

The valuation of securities held in the core or target portfolio of Clients with a private banking contract is subject to the following deviation.

Debt securities: In the case of government securities, primarily the BID price (sell price) quoted by the Bank for PB customers, if there is no Bank quoted price, then the best sell price of the ÁKK. Bloomberg screen BID prices are used if Bank and ÁKK BID are not available.

The Bank will endeavour to obtain a price from the most liquid market for the valuation, primarily in the Client's currency of purchase, if a liquid market price is available. Where a price reflecting fair market value is not available, stocks are stated at cost/value.

# 28. Detailed rules on the values serving as the basis of settlement with the collateral provider when enforcing the collateral security under the Business Regulations

Enforcement of collateral security established on a financial instrument with a collateral contract concluded before 15 March 2014:

The Bank acts in accordance with the provisions of the applicable legal regulations and the Investment Services Business Regulations, including the following rules:

Financial instrument serving as collateral security	Enforcement of collateral security, value of the collateral security serving as basis for settlement
Securities, financial instruments traded on a stock exchange, foreign stock exchange, regulated market or Other Trading Venue	The Bank is entitled to sell the security or other financial instrument at the price available on the day of the enforcement of the collateral security or, if the sale takes longer than one day, at any price available on any day during the period of sale on the Exchange, on a foreign stock exchange, on a regulated market or on any other Trading Place in the value of the amount not paid.
Securities, financial instruments traded on an Exchange and any foreign stock exchange, on the Exchange and any other Regulated Market, on Xetra and any other Regulated Market, or on several Other Trading Venues	· · · · · · · · · · · · · · · · · · ·
Units issued by an open-end investment fund.	The Bank redeems it on the basis of the net asset value of the fund unit on the day the security right is exercised.
Securities not traded on a Regulated Market or Other Trading Venue or otherwise not publicly quoted or issued in a private placement	The Bank is entitled to <b>sell the security at any available price</b> .
Securities and other financial instruments for which the Bank itself quotes a price.	The Bank is entitled, at its discretion, to take over the given security or other financial instrument for its own account against the Client's debt, calculated at the price it quotes on the day the security right is exercised.

Retail Government Security	Retail Government Securities are not a subject of collateral security, the Bank unilaterally waives the previously established collateral security, and therefore
	does not enforce collateral security for Retail Government Securities.

# Enforcement of collateral security established on a financial instrument with a collateral contract concluded after 15 March 2014:

The Bank acts in accordance with the provisions of the applicable legal regulations and the Investment Services Business Regulations, including the following detailed rules:

Financial instrument serving as		rity, value of the collateral security
A security that is traded on an exchange.	The Bank is entitled, in accordance to sell the collateral on the stock exavailable on the day of sale or, if any price available on any day d	re with the provisions of the Civil Code, schange without prior notice at the price the sale takes longer than one day, at luring the period of sale, in addition to
		ts right of direct satisfaction under the Code, subject to the following values:
with a value that can be determined independently of the parties according to the terms of the security at the time, with a	For exchange-traded financial instruments	any price available on the stock exchange on the date of exercise of the right of direct satisfaction
public market value or, in the absence of this, a financial instrument with a value that can	For units issued by an open-end investment fund	exercise of the right of direct satisfaction
be determined independently of the parties at the given time	•	the price quoted by the Hungarian State Treasury on the date of exercise of the right of direct satisfaction
	For other securities with a publicly quoted market price or public market value	any public market price or public market value available on the date of exercise of the right of direct satisfaction
	For other financial instruments, security representing a monetary claim with a value that can be determined independently of the parties at the given time	any value determined independently of the parties on the date of exercise of the right of direct satisfaction
In the case of a consumer pledge contract, if the object of the collateral security is a financial instrument with a stock exchange	The Bank is entitled to sell the sec rules of the Investment Firms Act:	curity on behalf of the pledgor under the
or other publicly quoted market	For exchange-traded financial instruments	The Bank is entitled to sell the financial instrument on the stock exchange without prior notice at the price available on the day of sale or, if the sale takes longer than one day, at any price available on any day during the period of sale.

Financial instrument serving as	Enforcement of collateral secu	rity, value of the collateral security	
collateral security	serving as basis for settlement		
		If a given financial instrument is traded on more than one stock exchange, the Bank is entitled to implement the sale on the stock exchange of its choice at any price available on any day during the period of sale.	
	For units issued by an open-end investment fund	The Bank is entitled to sell the fund unit at the <b>net asset value on the day of sale</b> (redemption).	
	For Hungarian government securities (except for the Retail Government Security)		
	For other financial instruments with a publicly quoted market price	The Bank is entitled to sell the financial instrument on the stock exchange without prior notice at the price available on the day of sale or, if the sale takes longer than one day, at any public market price available during the period of sale.	
	Other financial instruments with a value that can be determined independently of the parties at the given time	The Bank is entitled to sell the financial instrument on the stock exchange without prior notice at the price available on the day of sale or, if the sale takes longer than one day, at any price determined independently of the parties.	
	The Bank is entitled to sell the sec rules of the Investment Firms Act:	curity on behalf of the pledgor under the	
In the case of a consumer pledge contract, if the collateral is other financial instruments	take place at the price available of longer than one day, at any price of Failing this, the sale takes place a or, if the sale takes longer than of period of the sale by the Bank with the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the sale by the Bank with the sale by the Bank with the sale by the Bank with the sale by the sale by the Bank with the sale by the Bank with the sale by the sale by the Bank with the sale by the Bank with the sale by the sale by the sale by the Bank with the sale by the sa	other financial instrument, the sale may on the day of sale or, if the sale takes quoted by it during the period of sale. It the price available on the day of sale one day, at a price determined for the ith the assistance of an expert or on otained from market participants.	
Retail Government Security	Retail Government Securities are Bank unilaterally waives the previous	not a subject of collateral security, the busly established collateral security, and ateral security for Retail Government	

# 29. Key principles of forced sales

- Forced liquidation occurs by moving from more liquid instruments to less liquid instruments.
- Forced liquidation occurs by moving from securities with a shorter settlement period to securities with a longer settlement period.
- Forced liquidation occurs by moving from securities with shorter residual maturity to securities with longer residual maturity.
- Forced liquidation occurs by moving from HUF cash and securities instruments to foreign currency cash and securities instruments.

• Forced liquidation does not cover the Client's financial instruments already blocked and collateralised in connection with other transactions.

# 30. Information on deposit insurance, investor protection and securities guarantees

## National Deposit Insurance Fund (NDIF)

The provisions on deposit insurance are set out in the Bank's General Business Regulations.

# **Investor Protection Fund (IPF)**

<u>Source of legislation</u>: Act CXX of 2001 on the Capital Market (hereinafter: Capital Market Act) and Act LXXXV of 2015 on the Amendment of Certain Acts for Promoting the Development of the Financial Intermediary System

<u>Purpose of the IPF</u>: the IPF seeks to mitigate the losses that investors suffer as a result of the inability of the bank or investment firm with which they have deposited securities to pay out their legitimate claims. To mitigate losses, the IPF provides compensation to investors in the event that one of its members goes into liquidation and the bank or investment firm is unable to pay out the insured client claims due to lack of collateral.

<u>Securities covered by the IPF</u>: IPF protection is independent of the type, currency and issuer of the security, i.e. it applies to all securities held in a securities account with an investment service provider that is a member of the IPF.

<u>Persons insured by the IPF</u>: with certain exceptions, investors who have concluded a valid contract with an investment service provider in liquidation, e.g. for securities accounts, and on the basis of this contract the bank holds securities assets in their name which the service provider cannot release to them. Where any securities account held by an IPF member shows more of a specific bond than the amount shown in the records of the central securities depository of the same bonds, the Fund shall pay compensation for those bonds shown in the securities accounts, which, however, are not shown in the records of the central securities depository. The payment shall be made pro rata.

Rate of insurance cover: the IPF pays compensation up to a maximum of EUR 100,000 per person and per credit institution. The rate of compensation is 100% up to HUF 1,000,000, HUF 1,000,000 above HUF 1,000,000 and 90% of the amount above that. The IPF's obligation to indemnify arises if the Supervisory Authority orders the Bank to be wound up.

The amount of compensation must be determined based on the average price achieved during the one hundred and eighty days preceding the date of the commencement of liquidation proceedings. The price to be taken into account is the average price in stock exchange or OTC trading. If the securities in question were not traded in the reference period, the Fund's Management Board shall determine a price based on which to calculate the amount of compensation. The price shall be established to permit a situation as if the investor had sold the securities at the time of commencement of the liquidation proceedings. Compensation is granted only at the request of the investor.

The funds registered in the Client Account are insured by the IPF in accordance with the provisions of the Capital Market Act, whose detailed rules are set out in a separate announcement.

The insurance cover does not apply to exchange losses and impairments due to market events and does not provide protection in the event of the issuer's insolvency.

This information is not exhaustive. For additional information, please refer to the following: <a href="www.bva.hu">www.bva.hu</a>; Annex F of the Investment Services Business Regulations on investor protection, data protection and the regime for the management of securities secrets available at <a href="www.otpbank.hu">www.otpbank.hu</a> (Useful Information / Announcements, Business Regulations; Terms and Conditions / Retail Business Regulations / Securities Transactions)

# Treasury bills and government securities

Government securities in primary placement at the Bank:

Premium Hungarian Government Security
 Bonus Hungarian Government Security
 Hungarian Government Security
 Hungarian Government Security
 Discount Treasury Bill
 Hungarian Government Security

The State undertakes to pay the face value of State securities and the interest accruing thereon at the interest rates prevailing at the time of purchase to the holder of the government securities in the manner, at the time and in the amount specified. The claim for the face value and interest does not expire.

This information is not exhaustive. For additional information, please refer to the following: www.magyarorszag.hu, www.akk.hu, www.kozzetetelek.hu

# Capital guarantee provided by the Bank

<u>Content of the OTP guarantee:</u> the Bank undertakes that if the net asset value of the units of the Guaranteed Funds at redemption is less than the net asset value of the units at the time of purchase, the Bank pays the difference to the unit holder at redemption, subject to the following conditions:

- The unit holder has purchased and redeemed the fund unit at the distribution points
- The unit holder has held the fund unit in a securities account with the same Distributor continuously between the date of purchase and the date of redemption
- In the case of OTP Optima units, at least 90 calendar days have elapsed between purchase and redemption (including the date of purchase and redemption)
- In the case of OTP Capital Guaranteed Short Bond units, at least 45 calendar days have elapsed between purchase and redemption (including the date of purchase and redemption)

# **Guaranteed Fund Units:**

- OTP Optima Fund Unit
- OTP Tőkegarantált Rövid Kötvény (OTP Capital Guaranteed Short Bond) Unit

Pursuant to the above, the Client may sell the OTP Optima and OTP Capital Guaranteed Short Bond units on any trading day without any loss of capital and the Bank returns at least the invested capital to the Client if the conditions are met.

This information is not exhaustive. For additional information, please refer to the following: www.otpalap.hu

- Prospectus and Fund Management Policy of the OTP Optima Fund
- Prospectus and Fund Management Policy of the OTP Capital Guaranteed Short Bond Fund

# Information on capital and return protection, partial capital preservation provided by OTP Alapkezelő Zrt.

Please note that the following information is not exhaustive, the provisions on capital and return protection and partial capital preservation provided by OTP Alapkezelő Zrt. are contained in the currently effective Prospectus and Fund Management Policy of OTP Capital Protected Funds, which are available at <a href="https://www.otpalap.hu">www.otpalap.hu</a>.

On behalf of a closed-end capital protected Fund managed by OTP Alapkezelő Zrt., it promises to repay the face value of the units at the maturity of the Fund, in the case of an open-end capital protected Fund, the face value of the units or, in the case of a closed-end Fund converted into an open-end Fund, the net asset value per unit on the date specified in the Fund's prospectus.

In the case of a closed-end return-protected Fund, the promise of payment ensures a return on the terms and conditions predetermined at the start of the Fund, as part of which the Client receives the predeclared fixed return (Fixed Return) and the face value of the units (Payment upon Maturity). In the case of an open-end return-protected Fund, as part of the promise of payment, the Client receives the predeclared fixed return (Fixed Return)

47

The amended provisions of this Announcement, highlighted in italics and grey, indicate changes relative to the Announcement effective from 28 October 2025.

and the face value of the units or, in the case of a closed-end fund converted to an open-end fund, the net asset value per unit on the date specified in the Fund's prospectus (Payment upon Maturity).

#### Promise for payment of a Fixed Return:

The Fixed Return is only available to investors holding a fund unit on the record dates related to the return payment date specified in the Fund's Prospectus and Management Policy. The Fixed Return is paid on the predefined Return Payment Date.

## Promise on the amount of payment upon maturity:

The promise of payment relates only to the amount due to the investor holding a unit on the maturity date of the Fund, i.e. at the end of the term. In other words, it cannot be interpreted as an amount due to the holder of the unit on any other title, e.g. the amount of the purchase price achieved by selling the unit during continuous distribution. Payment upon Maturity is not made on the Maturity Date of the Fund, but according to the schedule of the termination of the Fund due to the end of term as set out in the Fund's Prospectus and Management Policy.

The buying and selling of units of closed-end investment funds listed on the Budapest Stock Exchange can only be carried out on the stock exchange during their term. The sale/buy price of the units on the stock exchange may differ from the net asset value per unit reflecting the current value of the units, depending on current supply and demand.

In the case of investment funds providing partial capital preservation, the promise of payment upon maturity is not 100% of the face value of the units, but a lower percentage. In other words, partial capital preservation is a reduction of the previous maximum capital protection (100%). These funds allow for participation in the underlying portfolio by redeeming fund units up to a pre-determined fixed amount upon maturity. In the case of investment funds providing partial capital preservation, the Client may not receive the original face value if held to maturity, but only a lower amount of capital fixed at the start of the fund. If the Client wishes to redeem or sell the security before maturity during the term, partial capital preservation does not apply to the redemption, thus the Client may realise a loss on the continuous trading or the exchange or OTC sale, depending on the daily net asset value or the daily exchange price.

This information is not exhaustive. For additional information, please refer to the following: <a href="www.otpalap.hu">www.otpalap.hu</a> (Prospectus and Management Policy per Fund for OTP Capital Protected Funds).

# 31. Discontinuation of ownership of dematerialised securities

Due to the specific nature of dematerialised securities resulting from legal requirements, they are not subject to the right of unlimited discontinuation of ownership as set out in Section 5:30 of the Civil Code in relation to movable property.

## 32. Cancellation of securities that have become invalid due to the termination of the issuer

If KELER becomes aware that the issuer of the securities has been finally struck from the company register without the issuer having made a decision to cancel the securities, KELER shall cancel the dematerialised securities issued by the issuer from the central securities account after the issuer has been finally struck from the company register. In this case, KELER publishes the value date of the cancellation of the dematerialised security on its official website and also notifies the Bank of the value date of the cancellation by means of a notice. KELER invalidates the securities on the announced value date, at which time the cancelled securities are also removed by the Bank from the Clients' Consolidated Securities Accounts.

The Bank makes the current version of the currently effective KELER announcement referred to above available to Clients in the Investment File and the "Securities Announcements" page of <a href="https://www.otpbank.hu">www.otpbank.hu</a>.

### 33. External information on corporate events

In order to facilitate the exercise of shareholder rights, the Bank shall make available to the Client, in accordance with the SRDII regulations, notifications of corporate actions actually sent to the Bank by an issuer subject to the SRDII regulations, through an intermediary or intermediary chain, in respect of the share registered in the

Consolidated Securities Account, in accordance with the SRDII regulations. In the case of securities and issuers not subject to the SRDII, the Bank is not obliged to transmit to the Client company notifications of corporate events of which the Bank has knowledge. The Bank makes notifications on corporate events available on the Securities/Communications page of <a href="https://www.otpbank.hu">www.otpbank.hu</a>:

In particular, a corporate event is deemed to be:

- The General Meeting and other adoption of resolutions by shareholders
- Dividend/interest payment
- Public takeover bid
- Delisting following a public takeover bid
- Exercise of purchase right
- Cancellation of securities, deletion from securities accounts
- Payment of the consideration for cancelled securities
- Securities conversion
- Exchange of securities
- Exercise of right of preemption when raising capital

Additional information on the above is available on the website of the issuer of the relevant security, as well as on <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.hu</a>, <a href="https://www.bet.hu">www.bet.h

The Bank does not assume any responsibility to monitor and notify the Client of all corporate events of any issuer, nor does it assume any responsibility for the completeness and accuracy of the information transmitted to the Client, nor for its timeliness. The Client acknowledges that it is the Client's responsibility and liability to monitor the issuer's notices (regular and special notices).

## 34. Foreign currency conversion

In case of collateral provision: The Client may provide the collateral required for the conclusion of the Individual Transaction in a currency other than the currency of the financial instrument subject to the transaction, in the Payment Account or Foreign Exchange Account linked to the Consolidated Securities Account or in a securities settlement account (in the case of orders placed using the Branch Network or OTPdirekt telephone banking service, except on bank holidays). In this case, the FX conversion order given by the Client is used to convert the cash collateral required to secure the Individual Transaction.

In the case of a contract for linked transactions, the Client with a Private Banking Master Agreement, by concluding the contract, authorises the Bank to carry out the conversion transactions necessary to provide the necessary collateral in the currency of the purchase transactions. When determining the order of conversions, the Bank aims to carry out as few conversions as possible. The conversion is carried out at the exchange rate most favourable to the Client for pairs of the same currency, requested at the same time and in the same direction.

For the Clients with no Private Banking Master Agreement the Bank does not carry out the foreign currancy conversion transactions.

<u>End-of-day transfer of funds</u> to a Primary Payment Account: The end-of-day transfer of the balance of the securities settlement account – unless a Payment Account or Foreign Currency Account with the same currency as the settlement account balance is linked to the Consolidated Securities Account – is made by automatic currency conversion to the Primary Payment Account.

The Bank applies the following transaction rates for currency conversion in the above cases.

- In case of conversion from HUF into foreign currency, the last OTP foreign exchange selling rate published by the Bank prior to the conversion date.
- In case of conversion from foreign currency into HUF, the last OTP foreign exchange buying rate published by the Bank prior to the conversion date.

- In case of conversion from and into two currencies other than HUF, the conversion is performed in two
  steps, also using the last published OTP foreign exchange buying and selling rates prior to the conversion
  date. In the first step, the foreign currency to be converted is converted into HUF using the last OTP
  foreign exchange buying rate published by the Bank prior to the conversion date, and in the second step
  - o the HUF amount is converted into the currency required for the provision of collateral, or
  - o in the case of an end-of-day transfer, to the currency of the Primary Payment Account using the last OTP foreign exchange selling rate published by the Bank prior to the conversion date.

Currency conversion may be carried out in the currencies in which the Bank holds a retail foreign currency account, the list of which currencies is set out in the currently effective "Announcement on the Charges on Retail Bank Accounts and Overdrafts".

The last exchange rates published by the Bank prior to the conversion date are available in the Bank's branch network and on the Bank's website, while the exchange rates published prior to the conversion date and their changes are available on the Bank's website.

#### 35. EMIR information

Information on Regulation No. 648/2012/EU of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR) is available on the Bank's website at <a href="https://www.otpbank.hu">www.otpbank.hu</a> on the following path: / Companies / Global Markets / EMIR Information textbox / EMIR Client Guide.

# 36. Stock matching methods in the Bank's distribution channels

Order type	Stock matching method*	Via branch	As part of the OTPdirekt telephone banking service	Via the OTPdirekt Internet, OTPdirekt Broker	Via the OTPdirekt SmartBroker services	Via the OTP Internetbank and Mobilebank services	Via the OTP SingleMarket service
Stock exchange sell order (BSE, Deutsche Börse A.G.'s electronic trading market	FIFO	_	_	✓	✓		✓
	LIFO			✓	✓		_
	HIFO			<b>✓</b>	✓	-	_
	LOFO			✓	✓		_
(Xetra))	Manual	_	_			-	-
	FIFO	✓	✓	✓		✓	_
l [	LIFO			✓		✓	_
Redemption of	HIFO			✓		✓	-
fund units	LOFO			✓		✓	-
	Manual**	✓	✓		-		_
OTC sell order	FIFO	✓	✓	✓		√	_
	LIFO					-	_
	HIFO					-	_
	LOFO						_
	Manual	✓	✓			-	_

<sup>\*</sup>An explanation of the abbreviations for stock matching methods is provided under the heading "Stock Matching" in the "Definitions" section of the Investment Services Business Regulations.

# 37. Information relating to the annual certificate on controlled capital market transactions issued by the Bank

By 15 February following the tax year, the Bank, as payer, issues to the private individual Client an itemised certificate detailing the amount of the transaction result (profit or loss) recognised in the tax year or, for positions not closed with a financial settlement, the income and the expenses on the transaction.

The stock matching methods are set out in Section 35 of this Supplementary Announcement. It is not possible to subsequently change the stock matching.

The transaction result is reduced by the value of the securities used to acquire them and by the eligible incidental costs.

Method of reporting incidental costs:

<sup>\*\*</sup>No manual stock matching is possible in case of advance redemption of fund units.

- a) Eligible verified (direct) incidental costs: fees and costs directly related to the transaction order or transaction indicated in the result of the various transactions, including the duty payment liability paid after the acquisition subject to duty and verified to the Bank.
- b) Eligible verified (indirect) incidental costs: the securities account management fee and the portfolio management fee incurred in the tax year, which are taken into account in the result of the transaction when the first security is removed, up to the absolute value of the result, thus reducing the result of the transaction (reducing the profit, increasing the loss).
- c) There are no incidental costs not taken into account in the results of transactions.
- d) the fees of the payment and/or foreign exchange account linked to the Consolidated Securities Account are not taken into account as incidental costs, and the fees of the linked payment and/or foreign exchange account are not shown on the certificate.

In the case of financial instruments and instruments free of account management fees (e.g. OTP shares), there are no incidental costs other than the fees directly related to the transaction order or transaction.

The Bank submits data to the NTCA on the income of the private individual Client from controlled capital market transactions on the basis of the actual (closed) settlement and stock outflow recorded at the Bank (indicating the name and tax identification number of the private individual).

The Bank is not subject to any tax (tax advance) deduction in connection with the controlled capital market transaction.

Detailed tax rules related to controlled capital market transactions are set out in the document "Taxation information on the investment services of OTP Bank Plc.".

#### 38. Client identification via SWIFT and GIROHáló

The Bank complies with the statutory obligation set out in Section 17(4) of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing as follows:

- a) It receives requests for verification electronically via SWIFT and GIROHáló and returns replies via the same channel.
  - When submitting a request for verification, the reference identifier "On\_line\_szamlanyitas\_bankazonosító(xxx)\_sorszám\_év(yy)"
  - (On\_line\_accountopening\_bankidentifier(xxx)\_number\_year(yy)) must be entered in field 20 of the MT 999 message on SWIFT or in the 'Subject' field on GIROHáló.
- b) Requests for verification by post are to be sent to the address below, with the reply returned to the sender's address:
  - Deposit Administration and Official Writs Department H-8901 Zalaegerszeg, PO Box.: 1026
  - The confirmation is sent by the Bank by registered mail to the sender's address.
- c) The service provider holding the Client account, securities account and securities custody account submitting the request for verification sends the natural person identification data of the Client recorded by it and the number of the payment account to be verified:
  - · payment account number,
  - first and last name of the holder of the payment account (first and last name at birth)
  - mother's maiden name,
  - place and date of birth,
  - address.
  - nationality,
  - type and number of identification document,
  - in the case of a foreigner, the place of residence in Hungary
- d) The Bank makes the following declarations in the confirmation:
  - "The identification of the Client in respect of payment account no. 117xxxxxxx has been performed, and the personal identification data made available by the Client match the personal identification data of the Client in the Bank's records."

or

• "The identification of the Client in respect of payment account no. 117xxxxxxx has been performed, and the personal identification data made available by the Client do not match the personal identification data of the Client in the Bank's records."

#### 39. Use of number formats on order contracts and certificates relating to securities transactions

The use of the number format for transaction vouchers is being continuously adapted to the renewal of the securities system, using a format that is in line with Hungarian numbering conventions. Accordingly, the following number format is used on newly created documents, for example: 10,500,550.00 with the text: ten million five hundred thousand five hundred and fifty-------

The renewed documents are now available for the transactions listed below:

- OTC buy/sell transactions
- Foreign currency conversion
- Subscription
- Auction
- Fund unit buy/sell transactions
- SG notes redemption
- Domestic and Foreign Stock Exchange transactions
- Transfer
- Shopping cart buy/sell
- Model portfolio opening, closing

The Bank also uses the Hungarian numbering on other documents related to investment services (e.g. Consolidated Certificate of Completion, CCMT Statement, Securities Account Statements, Tax Certificates, LTISA declarations, etc.).

The number format for older types of other investment services transactions that are under continuous renewal is currently still interpreted according to the following dot/comma character format, which is common abroad, e.g. 10,500,550.00, which also means, in text, ten million five hundred thousand five hundred and fifty

The Bank updates this information at regular intervals, in accordance with the schedule of developments.

# 40. Recording of financial assets arising from investment services transactions

Funds from executed investment services transactions in a Consolidated Securities Account – or funds released from the cash collateral of a buy-side transaction with an expired status that cannot be executed – are primarily recorded in the Payment Account or Foreign Exchange Account designated by the Client, but **in the case of certain securities transactions** (e.g. collateral for a stock exchange buy/sell transaction that expires during banking hours, credit from a correction transaction, payment of interest, yield and maturity principal, credit of the cash collateral for a buy-side reverse transaction), **the credit to the Payment Account / Foreign Exchange Account is only made at the end of the day of the current day, netted, together with funds to be credited/debited from other investment services transactions, during the end-of-day closing process of the banking systems**. (If the amount to be debited after the aggregation of the transactions for the current day – not subject to immediate credit/debit – is greater than the amount to be credited, the Payment Account / Foreign Exchange Account is debited at the end of the day during the end-of-day closing process, also netted.)

Therefore, the Bank automatically credits the funds resulting from securities transactions during the opening hours of its securities account management system to the Client's Payment Account or to the Foreign Exchange Account linked to the Consolidated Securities Account – corresponding to the currency of the crediting – for the transactions listed above only at the end of the day of the current day, during the end-of-day closing process of the banking systems. However, the Client (including the representative authorised to dispose of the Consolidated Securities Account) may request, at a bank branch or, on the basis of a separate contract for such service, through the Call Centre, PB, PPB, DPB or Global Markets service channels, by express order, the intraday crediting of the cash consideration or released cash collateral ("intraday cash balance") resulting from securities transactions not subject to immediate credit/debit. Based on the Client's instruction thus given, the funds for the current day are credited to the Payment Account or the Foreign Exchange Account by immediate withdrawal within the current day. The Client may also place securities transaction orders intraday against the intraday cash balance in accordance with the Investment Services Business Regulations.

# 41. Rules for the execution of transactions affected by Act XLIII of 2021 on the Establishment and Operation of the Data Reporting Background related to the Identification Tasks of Financial and Other Service Providers

If the expected execution price/rate of the transaction cannot be established with complete certainty, the expected value of the transaction is determined at a price/rate at least 10% less favourable than the expected price/rate when considering whether to prohibit the transaction.

#### 42. Rules on linked transactions

Orders for linked buy or sell or mixed linked transactions <u>may be placed by Clients</u> with a Private Banking Master Agreement, for the sale of traded domestic and foreign fund units, SG Notes, Government Securities or Government Securities OTC.

Clients with no Private Banking Master Agreement may place an order for linked only buy transactions (including purchase of domestic fund units, purchase of retail government securities in primary placement and subscription of retail bonds issued by OTP) in person without investment advice or in the framework of investment advice, indicating the specific amount of each buy order, with the proviso that the Bank shall only execute the linked buy transaction if the Client provides the required total collateral in the currency of the given transaction.

#### 43. Rules for managing the target portfolio

The Bank provides the service related to the management of the Target Portfolio to Clients with a Private Banking Master Agreement.

#### 44. LTIA T+3 Forward transaction

A fully collateralised T+3 day foreign exchange forward transaction on an LTIA account, i.e. an Individual Transaction entered into against 100% collateral deposited in a Long-Term Investment Account and settled in a Long-Term Investment Account, whereby the Client transfers a given amount of foreign exchange to the Bank against a cash amount in another currency or HUF, determined by applying the forward rate fixed at the time of the transaction, on the third banking day following the conclusion of the transaction as the settlement day. The possibility to conclude transactions is available from 3 January 2024 for Clients with a Global Markets Framework

Agreement and/or a Private Banking Master Agreement, which the Bank hereby informs its Clients about in this Supplementary Announcement.

# 45. Transactions that can be carried out by the Securities Account Holder and the persons who have control over the account

Unless otherwise provided by the legislation in force and the Business Regulations, the account holder Client's power of disposal – in the case of **account management** at the branch – is unlimited, while the representative's right of disposal is limited to the extent specified in the deed of representation.

#### In the case of a transaction channel other than the bank branch

A) Natural person account holder Client, permanent agent, legal representative, guardian and custodian may dispose of the securities account as follows (not available with an ad hoc authorisation):

# a) When using OTP Internet and MobileBank:

in the case of a client as the account holder who is over the age of 18 with legal capacity	has unlimited power of disposal*	
in the case of a client who is over the age of 18 with limited legal capacity, the	has the right of inquiry	
guardian/custodian		
the <b>permanent agent</b> of a client as the account	has unlimited power of disposal*	
holder who is over the age of 18 with legal		
capacity		
an account holder aged 14–18	has the right of inquiry	
in the event of an account holder aged 14-18,	has unlimited power of disposal*	
the legal representative		
in the event of an account holder aged 14-18,	has the right of inquiry	
the guardian/custodian		
in the event of an account holder aged 14-18,	may not dispose of the account (except in	
the permanent agent	the case of START securities accounts	
	where the permanent agent's power of	
	disposal is unlimited*)	
an account holder under the age of 14	has the right of inquiry	
in the event of a client as the account holder	has unlimited power of disposal*	
under the age of 14, the legal representative		
in the event of a client as the account holder	has the right of inquiry	
under the age of 14, the guardian/custodian		
in the event of a client as the account holder	may not dispose of the account (except in	
under the age of 14, the <b>permanent agent</b>	the case of START securities accounts	
	where the permanent agent's power of	
	disposal is unlimited*)	

<sup>\*</sup>Transaction rights at the time of issue of this Announcement include the right to subscribe to and buy/redeem government securities, OTP bonds, investment funds and the right to change the current setting of the account statement

b) When using the OTPdirekt Internet and OTPdirekt Broker channels: only the account holder Client can initiate queries and carry out transactions.

- c) When using the OTPdirekt telephone transaction channel: only the account holder Client can initiate queries and/or execute transactions (proxies, legal representatives and guardians/custodians may not be served).
- d) **Contact Centre telephone customer service channels** only general information about the account may be given to the authorised representative and/or legal representative.
- e) When using the OTP SingleMarket transaction channel:
  - Use of the OTP SingleMarket transaction channel is only available to Clients with a Retail Digital Service Contract and a Retail Client Qualification.
  - In the OTP SingleMarket transaction channel, the power of disposal is unlimited for the account holder
    who is at least 18 years of age with legal capacity, while the power of disposal is limited in the event of
    an account holder who is under 18 years of age, who has partially limited or no legal capacity or who is
    under guardianship. Also, an account holder who is subject to private bankruptcy pursuant to Act CV of
    2015 on the Debt Settlement of Natural Persons.
  - The OTP SingleMarket transaction channel is not available to the Client's permanent or ad hoc agent, legal representative, guardian or custodian.
- B) In the event of Clients as the account holder who are non-natural persons,
  - a) **OTP Internet and Mobile Bank** is currently not available;
  - b) The method of disposition for the OTPdirekt Internet channel is set out in the "OTPdirekt Business Rules for Commercial Banking, Chapter 1.2 The OTPdirekt internet service";
  - c) **OTPdirekt Broker transaction channel** not available
  - d) service via the **OTPdirekt telephone transaction channel** is not available
  - e) only general information about the account can be given via the **Contact Center telephone** customer service channel.
  - f) The **OTP SingleMarket transaction channel** is not available to sole traders and corporate clients at the time of this Announcement.

Annex 1: List of documents required for the generation of the national client identifier by nationality

Nationality	Data required for generating a national client identifier and the source of such data					
	Priority 1	Priority 2	Priority 3			
Austria	CONCAT					
Belgium	Belgian national registration number (Numéro de registre national - Rijksregisternummer)	CONCAT				
	Source: Personal ID card					
Bulgaria	Bulgarian personal registration number	CONCAT				
	Source: Passport, personal ID card or driver's licence					
Cyprus	National passport number	CONCAT				
	Source: Passport (issued by the Civil Registration Department of the Cyprus Ministry of Interior)					
Czech Republic	National registration number (Rodné číslo)	Passport number	CONCAT			
	Source: Personal ID card or driver's licence	Source: Passport	CONCAT			
Germany	CONCAT					
Denmark	Personal identification code Ten-digit alphanumeric code DDMMYYXXXX	CONCAT				
	Source: Passport, driver's licence or health card	CONCAT				
Estonia	Estonian personal identification code (Isikukood)					
Lotoma	Source: Passport, personal ID card or driver's licence					
Spain	Tax number (Código de identificación fiscal)					
•	Source: Personal ID card, driver's licence or social security card					
Finland	Personal identification code CONCAT					

	Source: Personal ID card or passport					
France	CONCAT					
United Kingdom*	UK national insurance number	CONCAT				
	Source: National insurance card	CONCAT				
Greece	10-digit DSS identification number (DSS digit investor share)					
Croatia	Personal identification number (OIB - Osobni identifikacijski broj)	CONCAT				
Cioatia	Source: Personal ID card, online interfaces and other documents					
Hungary	CONCAT					
Ireland	CONCAT					
Iceland	Personal identification code (Kennitala)					
ICCIAITO	Source: Personal ID card, passport or driver's licence					
Italy		Tax number (Codice fiscale)				
,	Source: Paper-based printed card or National Health Service plastic card					
Liechtenstein	National passport number	National identification card number	CONCAT			
	Source: Passport	Source: Personal ID card				
Lithuania	Personal code (Asmens kodas)	National passport number				
	Source: Passport, personal ID card or driver's licence	Source: Passport, personal ID card	CONCAT			
Luxembourg	CONCAT					
Latvia	Personal code (Personas kods)	CONCAT				
	Source: Personal ID card and passport	CONCAT				
Malta	National identification number	National passport number				
waita	Source: Personal ID card	Source: Directorate for Civil Registry				
Netherlands	National passport number	National identification card number	CONCAT			
	Source: National passport	Source: Personal ID card	CONCAT			

Norway	11-digit personal identification number (Foedselsnummer)  Source: Passport, personal ID card, driver's licence	CONCAT		
	National identification number (PESEL)	Tax number (Numer identyfikacji podatkowej)		
Poland	Source: Birth certificate, personal ID card, driver's licence	Source: Annual tax certificate sent by the National Revenue Administration		
Portugal	Tourne de la maifice de la continue	National passport number	CONCAT	
	Tax number (Número de Identificação Fiscal)	Source: National passport	CONCAT	
Romania	National identification number (Cod Numeric Personal)	National passport number	CONCAT	
	Source: Birth certificate, personal ID card, driver's licence	Source: National passport	CONCAT	
Swadon	Personal identification number	CONCAT		
Sweden	Source: Passport, health card, driver's licence			
Slovenia	Personal identification number (EMŠO: Enotna Matična Številka Občana)	CONCAT		
	Source: Personal ID card and national passport			
Slovakia	Personal identification number (Rodné číslo)	National passport number		
	Source: Birth certificate, personal ID card, driver's licence	Source: National passport (a citizen can have two and only the first one has it included)	CONCAT	
All other countries	National passport number	CONCAT		

<sup>\*</sup>Classified under "All other countries" from 1 January 2021.

# **Explanation of terms:**

Order of priority: In the case of a Client of a certain nationality indicated in the Annex, or of representatives involved in the transaction, the national client identifier may be generated using different data, but the data required to generate it must be taken into account in the order specified in this Annex. If the natural person has not provided the Bank with the personal identification data required under the Priority 1, the rules of Priorities 2 and 3 apply.

<u>CONCAT</u>: The national client identifier, which is a combination of the first and last name and date of birth of natural persons, used to identify natural persons. The natural person has no obligations other than to provide the data required for the generation of the CONCAT or to notify any changeofname.