

NOTICE

ON THE USE OF LEI CODES

4 May 2020

Please read this document carefully. Should you have any questions, please do not hesitate to contact our staff.

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As of 3 January 2018, Hungary is subject to the direct application of Regulation (EU) No 600/2014 of the European Parliament and of the Council (**MiFIR**), which, among other provisions, imposes the following obligation to use Legal Entity Identifiers in respect of OTP Bank Plc.'s Business Partners that are legal entities:

1. Obligation to use LEI codes

Under Article 26 of the MiFIR, OTP Bank Plc. is required to report to the competent authority any transactions that are traded in financial instruments set out in specific legislation (including securities admitted to trading on a stock exchange or traded in other trading venues) and are executed by OTP Bank Plc. (**reportable transactions**). Among other details, in its reporting OTP Bank Plc. is required to specify the LEI codes of Business Partners entering into reportable transactions as legal entities. Additionally, under Article 13 of Commission Delegated Regulation (EU) 2017/590, as of 3 January 2018 OTP Bank Plc. must refuse to execute a reportable transaction until it receives the valid and appropriate LEI code of the legal entity Business Partner as required for the fulfilment of the reporting obligation.

2. Regarding the above obligations, please take note of the following:

- (i) It is the responsibility of the Business Partner to obtain its own valid and active LEI code, as well as to continuously maintain the code and ensure that its status remains active. The LEI codes that qualify as active for the fulfilment of MiFIR reporting obligation are set out in OTP Bank Plc.'s "Supplementary Announcement to the Investment Services Business Regulations on the general securities distribution information and the rules of execution of certain transactions". In the event that the Business Partner fails to properly inform OTP Bank Plc. (in writing or by electronic message) via the channel designated in the Global Markets Master Agreement about the valid and active LEI code and its term of validity, or the Business Partner fails to ensure the continuity of the LEI code or its active status, or fails to provide a statement as referred in (ii) below, then OTP Bank Plc. must, in accordance with the applicable legal provisions, refuse to execute the reportable transaction until it receives proper information in accordance with the Global Markets Master Agreement from the Business Partner on the valid and active LEI code to be applied.
- (ii) OTP Bank Plc. does not provide any services in connection with obtaining LEI codes.
- (iii) Please note that the range of financial instruments and securities underlying reportable transactions is subject to constant change. This may result in situations such as the following:
 - (A) a financial instrument or security acquired by the Business Partner may be admitted to trading on a stock exchange or other trading venue, even without the Business Partner's knowledge, or

- (B) financial instruments previously admitted to trading may also be delisted.

Accordingly, it may occur that future sales of a financing instrument or security previously purchased by the Business Partner qualify as reportable transactions when, for example, following its acquisition by the Business Partner, the financing instrument or security concerned is admitted to trading on a stock exchange or trading venue. In such cases, the Business Partner's order for the sale of the financing instrument or security, along with all subsequent reportable transactions, will require the Business Partner's valid and active LEI code, otherwise execution will be refused.

- (iv) OTP Bank Plc. does not assume any liability for any damage or consequences incurred by the Business Partner, arising from or in connection with OTP Bank Plc.'s refusal, due to the absence of a valid and active LEI code, to execute a transaction that is reportable by the Business Partner.

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This document is not comprehensive and its transfer to Business Partners does not constitute an offer, investment advice, tender notice, investment consulting, investment or financial analysis, solicitation for the purchase of any financial instrument, or any other kind of advice on legal, tax, or accounting issues, and the data provided herein are provided for informational purposes, intended solely as the provision of advance information to OTP Bank Plc.'s current and future Business Partners as required by law.

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The contents of this document are limited to general information and knowledge and as such, it disregards the unique or specific needs of individual Business Partners and their willingness and ability to take risk; therefore, in case of any questions, please contact our staff or refer to your bank consultant before making an investment decision. Should you require investment advice from OTP Bank Plc. prior to making your decision, please contact our staff with a view to concluding an investment counselling agreement and

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