

INFORMATION NOTICE

OTP Bank Plc. (hereinafter referred to as the “Bank”) operates a Whistleblowing system pursuant to Act XXV of 2023 on Complaints, Whistleblowing and the Rules for Reporting Abuses (hereinafter referred to as the “Whistleblowing Act”).

I. What someone can whistleblow about

In the Whistleblowing system, information about illegal or suspected illegal acts or omissions or other misconduct, or possible violations of the values set out in the OTP Group’s Code of Ethics, can be reported by anyone, even anonymously.

II. Reporting channels

- a) in writing** by post to the Compliance Directorate (H-1131 Budapest, Babér utca 9.)
- b) in writing** by e-mail to etika@otpbank.hu
- c) by phone** from Monday to Friday between 8.00 a.m. and 8.00 p.m. on the Bank’s whistleblowing phone number (+36 1 366 6768)
- d) in person** during working hours (by appointment) at the Compliance Directorate
- e) online** on the [website](#) by selecting the relevant subsidiary or group level notification option

The Bank uses a recorded voice messaging system requiring whistleblower consent as part of its telephone Whistleblowing system. The message will be recorded in a durable and retrievable form after the information has been provided in accordance with the provisions on the protection of personal data. If the whistleblower makes the report in person, the Bank will put the report in writing and provide the whistleblower with a copy of it, with the possibility to check, correct and accept it by signing.

III. Data protection

Within the framework of the Whistleblowing system, the personal data

- a) of the Whistleblower,
- b) of the person whose conduct or omission gave rise to the Whistleblowing, and
- c) of the person who may have material information about the facts contained in the Whistleblowing,

which is essential for the investigation of the Whistleblowing, may be processed solely for the purpose of investigating the Whistleblowing and remedying or stopping the conduct that is the subject of the Whistleblowing.

Any data processed under the Whistleblowing system other than the personal data mentioned above must be deleted without delay.

The personal data of the Whistleblower may only be disclosed to the body competent to carry out the procedure initiated on the basis of the Whistleblowing report, if that body is legally entitled to process the data or the Whistleblower has consented to the transfer of his or her data. The Whistleblower's personal data will not be disclosed without the Whistleblower's consent.

If it has become clear that the Whistleblower has, in bad faith, provided false data or information and

- there are indications that a criminal offence or administrative infringement has been committed, the Whistleblower's personal data must be disclosed to the authority or person entitled to conduct the proceedings; or
- if there are reasonable grounds for believing that the Whistleblower has caused unlawful damage or other impairment of a right to another person, the Whistleblower's personal data must be disclosed at the request of the authority or person entitled to initiate or conduct the proceedings.

Detailed information on data processing rights and remedies is available in the Privacy [Notice](#) .

IV. Investigation of a Whistleblowing report

Within seven days of receipt of a written Whistleblowing report submitted via the Whistleblowing system, the Bank **will send a confirmation of the submission of the Whistleblowing report** to the Whistleblower and provide general information on the procedural and data processing rules under the Whistleblowing Act. The Bank **will investigate** the allegations contained in the Whistleblowing report in the shortest time possible under the circumstances, but **within** a maximum of **thirty days** of receipt of the Whistleblowing report. The 30-day time limit may be extended only in particularly justified cases, with the simultaneous notification of the Whistleblower. In this case, the Whistleblower must be informed of the expected date of the investigation and the reasons for the extension of the investigation. Even in the event of an extension, the time limit for investigating the Whistleblowing report shall not exceed three months.

The investigation of a Whistleblowing report may be omitted in the following cases:

- a) a repeated Whistleblowing report is made by the same Whistleblower with the same content as the previous Whistleblowing report;
- b) the Whistleblower made the Whistleblowing report more than 6 months after the date on which he/she became aware of the act or omission;
- c) the Whistleblowing is made by an unidentified (with no contact details) Whistleblower and the Whistleblowing report is incomplete to the extent that no result can be expected from its investigation;
- d) the injury to public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the natural or legal person concerned by the Whistleblowing report as a result of the investigation of the Whistleblowing report;
- e) the Whistleblowing report is still incomplete after the receipt of the provision of missing details to the extent that no result can be expected from its investigation;
- f) the Whistleblower has withdrawn the Whistleblowing report.

During the investigation of the Whistleblowing report, the Bank will keep in contact with the Whistleblower, and may invite the Whistleblower to supplement or clarify the Whistleblowing report, to clarify the facts of the case, or to provide additional information.

The Bank will inform the Whistleblower in writing of the investigation or non-investigation of the Whistleblowing report and the reasons for the non-investigation or the outcome of the investigation of the Whistleblowing report. Written information may be dispensed with if the Bank has informed the Whistleblower orally and the Whistleblower has taken note of the information.

If the parties concerned (the Whistleblower or the Reported Party) do not agree with the outcome of the investigation (first instance procedure) of the Whistleblowing report, they may, **within 15 days of receiving the information, contact the Ethics Committee in writing through the Whistleblowing channels.**

V. Protecting the Whistleblowers

The rules on protecting the Whistleblowers are set out in the Whistleblower Protection [Notice](#).